



# IHBG-ARP

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## *Implementation Training*

April 27, 2021

# WELCOME

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**Office of Native American Programs**

# TRAINING COMPONENTS

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# Training Purpose

## **Indian Housing Block Grant (IHBG) [Formula] Funding Provided Under the American Rescue Plan Act (ARP Act)**

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### ***IHBG-ARP Grants***

#### **Training Purpose**

Develop a practical understanding of the:

- IHBG-ARP program: Eligible Purpose and Activities
- PIH Notice 2021-11 (April 13, 2021)
- Abbreviated IHP/APR
- Documentation
- Reporting

# ARP Act Background

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## **American Rescue Plan Act of 2021 (ARP) (Public Law 117-2)**

- Signed into law on March 11, 2021, by President Biden
- Additional \$450,000,000 in IHBG formula funding for eligible Indian tribes and TDHEs
- Allocated based on the 2021 Formula
- Prevent, prepare for, and/or respond to COVID-19
- Including maintaining normal operations and funding eligible NAHASDA activities during recipient's impact period
- Authority to waive or specify alternative statutory/regulatory requirements to facilitate or expedite the use of IHBG-ARP grant funds

# Applying for IHBG-ARP Grant

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- IHBG-ARP grants will be awarded as separate IHBG grants.
- On March 25, 2021, HUD published IHBG-ARP grant allocations for all Indian tribes that are eligible to receive funding.
- These allocations are available at: [https://www.hud.gov/sites/dfiles/PIH/documents/IHBG-ARP\\_for\\_Codetalk3.24.21.pdf](https://www.hud.gov/sites/dfiles/PIH/documents/IHBG-ARP_for_Codetalk3.24.21.pdf)
- HUD has streamlined the application process while ensuring IHBG-ARP grant funds will be used only to prevent, prepare for, and respond to COVID-19, as required under ARP.
- Indian tribe or TDHE must first submit an Abbreviated Indian Housing Plan/Annual Performance Report (IHP/APR) (Form: HUD-52737) to its Area Office of Native American Programs (AONAP).
- The Abbreviated IHP/APR is a streamlined fillable PDF version of the regular IHP/APR.
- Except for a single check box, it is identical in format to the Abbreviated IHP/APR used by recipients of IHBG-CARES funding.



## Applying for IHBG-ARP Grant (Continued)

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- The regular IHP/APR form contains a total of 15 sections that IHBG recipients are normally required to complete. Under the Abbreviated IHP, IHBG-ARP recipients are only required to complete 7 sections.
- The Abbreviated IHP requires the IHBG-ARP recipient to complete Sections 1 (Cover Page), 3 (Programs), 5 (Budget), 7 (IHP Certification of Compliance), 8 (IHP Tribal Certification), 9 (Tribal Wage Rate Certification), and 12 (Audits).
- IHBG-ARP recipients will not be required to use the Energy and Performance Information Center (EPIC) to submit the Abbreviated IHP.
- The Abbreviated IHP must be submitted electronically via email to the AONAP.
- Specific instructions on how to use and complete the form are included in the form.

# Applying for IHBG-ARP Grant (Continued)

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- Indian tribes or TDHEs that did not submit a FY 2021 IHP (or whose IHP was not approved) may still take advantage of this funding opportunity by preparing and submitting an Abbreviated IHP/APR.
- To help minimize unnecessary administrative burden, HUD is providing regulatory waiver relief pertaining to the Abbreviated IHP.
  - HUD will accept any Abbreviated IHP that cannot be formally adopted by an Indian tribe or TDHE in accordance with their normal policies and procedures for adopting IHPs, provided an official or principal provides a statement indicating that it is not practical or safe for the Indian tribe or TDHE to assemble a board or other governing body to conduct business to secure required approvals due to the impact of COVID-19 on operations of the Indian tribe or TDHE (or the beneficiary Indian tribe of the TDHE).
  - IHBG recipients are required to provide HUD with all required IHP certifications in their Abbreviated IHPs. If an authorized official of an Indian tribe or TDHE provides a statement to HUD indicating that it is not practical or safe for the Indian tribe or TDHE to secure new certifications due to the impact of COVID-19 on its operations HUD will accept all IHP certifications that were previously submitted and accepted by HUD for FY 2021 IHBG grants (or for FY 2020 IHBG grants for those IHBG recipients that have not yet submitted their FY 2021 IHP), in lieu of requiring new tribal certifications to be submitted.



# IHP Submission and Review

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- HUD will review all Abbreviated IHPs and will make a determination as to whether an Abbreviated IHP is in compliance with ARP and NAHASDA.
- If an IHBG-ARP recipient fails to adequately describe how the proposed activities are tied to preventing, preparing for, or responding to COVID-19, or meet other Abbreviated IHP requirements, HUD will reject the Abbreviated IHP and notify the IHBG-ARP recipient of any deficiencies in the Abbreviated IHP.
  - IHBG-ARP recipients should amend and resubmit rejected Abbreviated IHP for further consideration.
  - AONAP will provide any necessary technical assistance to help the IHBG-ARP recipient modify its Abbreviated IHP, as appropriate, to help ensure that it can be found in compliance with the ARP, NAHASDA, and any requirements specified by HUD

# Follow-up Actions

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- ONAP will email the IHBG-ARP grantee an award letter and a grant agreement package to sign and return via email once the Abbreviated IHP is found in compliance.
- Funds will be available to draw down from the Line of Credit Control System (LOCCS) when the fully executed grant agreements are returned by the recipient and processed by HUD.
- Documents such as the grant agreement can be signed, scanned, and sent back to ONAP electronically.
- The IHBG-ARP recipient should maintain all documents with wet signatures in their records.



# Eligible Purposes

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## **Prevent, Prepare for, and/or Respond to COVID-19**

- Including maintaining normal operations and funding eligible NAHASDA activities during recipient's impact period
- Grant funds may also be used **to cover or reimburse allowable costs** incurred by the recipient provided:
  - the funds to be reimbursed were used to prevent, prepare for, and/or respond to COVID-19;
  - the costs to be reimbursed were paid with **non-Federal funds**; and
  - the costs were incurred "after January 21, 2020" (i.e., from 1/22/2020)

# Eligible Activities Examples

These descriptions are designed to provide general guidance to recipients and are not intended to limit the range of eligible IHBG-ARP grant activities that can be carried out.

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## Eligible Housing Activities

- Carrying out activities eligible under IHBG provided those activities will prevent, prepare for, and respond to COVID-19;
- Payment of tenant and homebuyer utilities;
- Installing a lockbox or other method for collecting rent payments without the need for personal contact;
- Supporting laundry facilities to assist residents with eliminating the spread of COVID-19;
- Paying for IHBG operating costs due to a significant reduction in rent receipts caused by COVID-19;
- Providing essential housing services to shelter residents including childcare, education services, employment assistance, outpatient health services, legal services, mental health services, and transportation, provided such services are not duplicative of other Federally-funded services;
- Working with resident groups to help educate residents on social distancing and other practices designed to minimize the risk of community spread of COVID-19;
- Acquiring, constructing, converting, or rehabilitating structures to reduce and prevent homelessness, and reduce vulnerability to COVID-19;



# Eligible Activities Examples (Continued)

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## Emergency Response

- Carrying out activities that would prevent individuals from becoming homeless and rapidly rehousing homeless individuals;
- Acquiring, constructing, converting, or rehabilitating structures that can serve as temporary emergency shelters, or converting existing facilities for this purpose, to ensure homeless persons are provided safe shelter and to minimize the risk of community spread of COVID-19;
- Providing short-term rental assistance to homeless persons in hotel/motels to minimize infection and spread of COVID-19;
- Providing units or other space for temporary quarantine purposes as a result of COVID-19;
- Providing emergency housing for health care workers;
- Purchasing Telehealth equipment to allow assisted residents access to health care providers from home;
- Purchasing and distributing personal protective equipment (PPE) such as gloves, surgical masks and goggles, hand hygiene products, soap, paper towels, hand sanitizer, hand wipes, tissues, and thermometers;

## Eligible Activities Examples (Continued)

- Purchasing and distributing cleaning products such as disinfectants, sanitizers, waste disposal supplies, and other supplies to disinfect homes of residents, common areas, housing-related public facilities, and other public spaces like playgrounds;
- Purchasing of sanitation equipment;
- Purchasing and distribution of water, groceries, prescriptions, and other items for quarantined families, Elders, Veterans, at-risk populations, or disabled households;
- Purchasing beds or cots for isolation/quarantine centers;
- **Paying the transportation costs to get IHBG-assisted families and staff of the IHBG recipient to and from a vaccination site;**
- **Coordinating with health clinics to provide on-site vaccinations either at a Tribal or TDHE owned or operated location or at a mutually agreed upon location;**
- **Paying the costs of providing public health information to staff and residents so they can learn about the benefits of getting vaccinated and how to get vaccinated;**
- **Supporting IHBG-assisted families and staff of the IHBG recipient with online registration for vaccination appointments and keeping them informed as vaccination efforts continue**



## Eligible Activities Examples (Continued)

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### **Administrative Activities**

- Preparing housing or TDHE staff and Board of Commissioners to conduct business in a remote working environment, and providing them with necessary supplies to carry out the IHBG program;
- Setting up web-based communication options for program participants and staff;
- Implementing policies, procedures, and other measures to protect vulnerable populations;
- Revising the approval process for policies and procedures in order to limit person-to-person contact;
- Paying staff salaries including the salaries of employees who must shelter in place or are otherwise prohibited from interacting with community members due to COVID-19;
- Paying hazard pay for essential workers that are managing or maintaining units, or staffing emergency or isolation centers, provided such costs are considered necessary and reasonable under 2 C.F.R. Part 200;
- Paying transportation costs of staff to perform IHBG program functions or assist tenants in accessing food, medical care, or prescriptions.

# Duplication of Benefits

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- Before expending IHBG-ARP grant funds on any eligible activity, recipient must conduct a duplication of benefits analysis
- Ensure that no insurance proceeds or other financial assistance has been received or is available to pay costs INTENDED TO BE charged to the IHBG-ARP grant
- Recipient retains a copy of the duplication of benefits analysis for monitoring purposes



# Abbreviated IHP/APR Form

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- To receive the IHBG-ARP grant, must submit an Abbreviated IHP to the ONAP Area Office **electronically (via email)**
- **You must click “IHBG-CARES/IHBG ARP” checkbox in Section 1 in order to access the Abbreviated IHP**
- Abbreviated IHP/APR
  - Modified version of the regular IHP/APR
  - Requesting less information
  - Amended certain data fields
- Fillable PDF – open with free version of Adobe Acrobat reader
- Abbreviated Indian Housing Plan (IHP):
  - How the IHBG recipient will carry out activities or projects that meet the requirements of the ARP Act
- If no FY 2021 IHP submitted: submit Abbreviated IHP
  - May be required to submit additional information

# Abbreviated IHP/APR Form (Continued)

## Cover Page

**SECTION 1: COVER PAGE** [Instructions](#) [Help Files](#)

**ONAP Office Use Only**  
Release Date: 3/17/2021  
[Export to XML](#)  
[Import XML](#)  
apr\_id

(1) Grant Number:

(2) Recipient Program Year:

(3) Federal Fiscal Year:

☒ (4) IHBG-CARES/IHBG-ARP  
☐ (5) Initial Plan (Complete this Section then proceed to Section 2) or an Amended IHP  
☐ (6) Annual Performance Report (Complete items 27-30 and proceed to Section 3)  
☐ (7) Tribe  
☐ (8) TDHE

(9) Name of Recipient:

(10) Contact Person:

(11) Telephone Number with Area Code (999) 999-9999 :

(12) Mailing Address:

(13) City:  (14) State:  (15) Zip Code (99999 or 99999-9999):

(16) Fax Number with Area Code (if available) (999) 999-9999 :

(17) Email Address (if available):

(18) If TDHE, List Tribes Below:

(19) Tax Identification Number:

(20) DUNS Number:

(21) CCR/SAM Expiration Date (MM/DD/YYYY):

☒ (22) IHBG-CARES Amount:   
Date Started Preparing for COVID-19:

(23) Name of Authorized IHP Submitter:

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# Abbreviated IHP/APR Form (Continued)

## Program Description

**1.1. Program Name and Unique Identifier:** Unique Identifier: COVID-19 Prevention  
COVID-19 Preparation  
COVID-19 Respond  
COVID-19 Reimbursement

**1.2. Program Description:** (This should be the description of the program.)

**1.3. Eligible Activity Number:** (Select one activity from the Eligible Activity list. For any activity involving housing units as the output measure (excluding operations and maintenance), do not combine homeownership and rental housing in one activity, so that when housing units are reported in the APR they are correctly identified as homeownership or rental.)

**1.4. Outcome:** (Select one outcome from the Outcome list. For any activity involving housing units as the output measure (excluding operations and maintenance), do not combine homeownership and rental housing in one activity, so that when housing units are reported in the APR they are correctly identified as homeownership or rental.)

**1.5. Actual Outcome Number:** (In the APR identify the actual outcome from the Outcome list.)

**1.6. Who Will Be Assisted:** (Describe the types of households that will be assisted under the program.):  
☐ Low-income Indian households ☐ Non-low income Indian households ☐ Non-Indian households

**1.7. Type and Level of Assistance:** (Describe the type and level of assistance that will be provided to each household, as applicable.)

**1.8. APR:** (Describe the accomplishments for the APR in the 12-month program year. In accordance with 24 CFR § 1000.512(b)(2), provide an analysis and explanation of cost overruns or high unit costs.)

**1.9. Planned and Actual Outputs for 12-Month Program Year:**

Planned Number of Units to be Completed in Year Under this Program	Planned Number of Households to be Served in Year Under this Program	Planned Number of Acres To be Purchased in Year Under this Program

**APR: Actual Number of Units Completed in Program Year:**

APR: Actual Number of Units Completed in Program Year	APR: Actual Number of Households Served in Program Year	APR: Actual Number of Acres Purchased in Program Year

**1.10. APR:** If the program is behind schedule, explain why. (24 CFR § 1000.512(a)(2))

**1.1. Program Name and Unique Identifier:** Unique Identifier: COVID-19 Prevention  
COVID-19 Preparation  
COVID-19 Respond  
COVID-19 Reimbursement

**1.2. Program Description:** (This should be the description of the program.)

**1.3. Eligible Activity Number:** (Select one activity from the Eligible Activity list. For any activity involving housing units as the output measure (excluding operations and maintenance), do not combine homeownership and rental housing in one activity, so that when housing units are reported in the APR they are correctly identified as homeownership or rental.):

(17) Tenant Based Rental Assistance [202(3)]  
(18) Other Housing Services [202(3)]  
(19) Housing Management Services [202(4)]  
(20) Operation and Maintenance of NAHASDA-Assisted Units [202(4)]  
(21) Crime Prevention and Safety [202(5)]  
(22) Model Activities [202(6)]  
(23) Self-Determination Program [231-235]  
(24) Infrastructure to Support Housing [202(2)]  
(25) Reserve Accounts [202(9)]  
(26) Other COVID-19 Activities Authorized by Waivers or Alternate Requirements

**1.6 Who Will Be Assisted:** (Describe the types of households that will be assisted under the program.):  
☐ Low-income Indian Households ☐ Non-low income Indian Households ☐ Non-Indian Households

# Reimbursement of Costs

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- IHBG-ARP grant funds may cover or reimburse any:
  - Eligible and allowable costs;
  - To **Prevent, Prepare** for, and/or **Respond** to COVID-19;
  - Paid by the IHBG recipient with other non-Federal funds; **and**
  - Dating after January 21, 2020, and later.
- **Section 1** of the Abbreviated IHP/APR identifies the date recipient began preparing for COVID-19.
  - There should be a program in the Abbreviated IHP/APR specific to reimbursement costs.
- **Unique Identifier (Line 1 of Section 3)** must be titled COVID-19 reimbursement costs.
- Recipients should maintain start date documentation, documentation to support any costs the recipient plans to reimburse with grant funding
  - Must show what is being reimbursed (must be non-federal funds, cannot be program income).



# Abbreviated IHP/APR Form (Continued)

## Sources of Funding

### SECTION 5: BUDGETS

NAHASDA §§ 102(b)(2)(C), 404(b)

(1) Sources of Funding (NAHASDA § 102(b)(2)(C)(i), (404(b))) (Complete the non-shaded portions of the chart below to describe your estimated or anticipated sources of funding for the 12-month program year. APR Actual Sources of Funding -- Please complete the shaded portions of the chart below to describe your actual funds received. Only report on funds actually received and under a grant agreement or other binding commitment during the 12-month program year.)

SOURCE	IHP					APR					
	(A) Estimated amount on hand at beginning of program year	(B) Estimated amount to be received during 12-month program year	(C) Estimated total sources of funds (A+B)	(D) Estimated funds to be expended during 12-month program year	(E) Estimated unexpended funds remaining at end of program year (C-D)	(F) Actual amount on hand at beginning of program year	(G) Actual amount received during 12-month program year	(H) Actual total sources of funding (F+G)	(I) Actual funds expended during 12-month program year	(J) Actual unexpended funds remaining at end of 12-month program year (H - I)	(K) Actual unexpended funds obligated but not expended at end of 12-month program year
IHBG-CARES Funds			\$0		\$0			\$0		\$0	
TOTAL	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL Columns C & H, 2 through 10			\$0					\$0			

#### Notes:

- For the IHP, fill in columns A, B, C, D, and E (non-shaded columns). For the APR, fill in columns F, G, H, I, J, and K (shaded columns).
- Total of Column D should match the total of Column N from the Uses of Funding table below.
- Total of Column I should match the Total of Column Q from the Uses of Funding table below.
- For the IHP, describe any estimated leverage in Line 3 below (Estimated Sources or Uses of Funding). For the APR, describe actual leverage in Line 4 below.

# Abbreviated IHP/APR Form (Continued)

## Uses of Funding

**(2) Uses of Funding** (NAHASDA § 102(b)(2)(C)(ii)) (Note that the budget should not exceed the total funds on hand (Column C) and insert as many rows as needed to include all the programs identified in Section 3. **Actual expenditures in the APR section are for the 12-month program year**

PROGRAM NAME	IHP			APR		
	(L) Prior and current year IHBG (only) funds to be expended in 12- month program year	(M) Total all other funds to be expended in 12- month program year	(N) Total funds to be expended in 12-month program year (L+M)	(O) Total IHBG (only) funds expended in 12-month program year	(P) Total all other funds expended in 12-month program year	(Q) Total funds expended in 12- month program year (O+P)
Program Name			\$0			\$0
Planning and Administration			\$0			\$0
<b>TOTAL</b>	\$0	\$0	\$0	\$0	\$0	\$0



# Abbreviated IHP/APR Form (Continued)

## Uses of Funding

### Notes:

- a. Total of Column L cannot exceed the IHBG funds from Column C, Row 1 from the Sources of Funding table in Line 1 above.
- b. Total of Column M cannot exceed the total from Column C, Rows 2-10 from the Sources of Funding table in Line 1 above.
- c. Total of Column O cannot exceed total IHBG funds received in Column H, Row 1 from the Sources of Funding table in Line 1 above.
- d. Total of Column P cannot exceed total of Column H, Rows 2-10 of the Sources of Funding table in Line 1 above.
- e. Total of Column Q should equal total of Column I of the Sources of Funding table in Line 1 above.

(3) **Estimated Sources or Uses of Funding (NAHASDA § 102(b)(2)(C)).** (Provide any additional information about the estimated sources or uses of funding, including leverage (if any). You must provide the relevant information for any planned loan repayment listed in the Uses of Funding table on the previous page. This planned loan repayment can be associated with Title VI or with private or tribal funding that is used for an eligible activity described in an IHP that has been determined to be in compliance by HUD. The text must describe which specific loan is planned to be repaid and the NAHASDA-eligible activity and program associated with this loan):

(4) **APR (NAHASDA § 404(b))** (Enter any additional information about the actual sources or uses of funding, including leverage (if any). You must provide the relevant information for any actual loan repayment listed in the Uses of Funding table on the previous page. The text must describe which loan was repaid and the NAHASDA-eligible activity and program associated with this loan.):

# Abbreviated IHP/APR Form (Continued)

## IHP Certification

**SECTION 7: INDIAN HOUSING PLAN CERTIFICATION OF COMPLIANCE**  
NAHASDA § 102(b)(2)(D)

By signing the IHP, the recipient certifies its compliance with Title II of the Civil Rights Act of 1968 (25 USC Part 1301 et seq.), and ensures that the recipient has all appropriate policies and procedures in place to operate its planned programs. The recipient should not assert that it has the appropriate policies and procedures in place if these documents do not exist in its files, as this will be one of the items verified during any HUD monitoring review.

(1) In accordance with applicable statutes, the recipient certifies that:  
It will comply with Title II of the Civil Rights Act of 1968 in carrying out this Act, to the extent that such title is applicable, and other applicable federal statutes.  
Yes ☐ No ☐

(2) In accordance with 24 CFR 900.328, the recipient receiving less than \$200,000 under FCAS certifies that:  
There are households within its jurisdiction at or below 80 percent of median income.  
Yes ☐ No ☐ Not Applicable ☐

(3) The following certifications will only apply where applicable based on program activities.

a. It will maintain adequate insurance coverage for housing units that are owned and operated or assisted with grant amounts provided under NAHASDA, in compliance with such requirements as may be established by HUD.  
Yes ☐ No ☐ Not Applicable ☐

b. Policies are in effect and are available for review by HUD and the public governing the eligibility, admission, and occupancy of families for housing assisted with grant amounts provided under NAHASDA.  
Yes ☐ No ☐ Not Applicable ☐

c. Policies are in effect and are available for review by HUD and the public governing rents charged, including the methods by which such rents or homelender payments are determined, for housing assisted with grant amounts provided under NAHASDA, and  
Yes ☐ No ☐ Not Applicable ☐

d. Policies are in effect and are available for review by HUD and the public governing the management and maintenance of housing assisted with grant amounts provided under NAHASDA.  
Yes ☐ No ☐ Not Applicable ☐



# Abbreviated IHP/APR Form (Continued)

## Tribal Certification

### SECTION 8: IHP TRIBAL CERTIFICATION

NAHASDA § 102(c)

This certification is used when a Tribally Designated Housing Entity (TDHE) prepares the IHP or IHP amendment on behalf of a tribe.

This certification must be executed by the recognized tribal government covered under the IHP.

(1) The recognized tribal government of the grant beneficiary certifies that:

(2) ☐ It had an opportunity to review the IHP or IHP amendment and has authorized the submission of the IHP by the TDHE; or

(3) ☐ It has delegated to such TDHE the authority to submit an IHP or IHP amendment on behalf of the Tribe without prior review by the Tribe.

(4) Tribe:	
(5) Authorized Official's Name and Title:	
(6) Authorized Official's Signature:	
(7) Date (MM/DD/YYYY):	

# Abbreviated IHP/APR Form (Continued)

## Wage Rate Certification

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### SECTION 9: TRIBAL WAGE RATE CERTIFICATION

NAHASDA §§ 102(b)(2)(D)(vi), 104(b)

By signing the IHP, you certify whether you will use tribally determined wages, Davis-Bacon wages, or HUD determined wages. Check only the applicable box below.

- (1) ☐ You will use tribally determined wage rates when required for IHBG-assisted construction or maintenance activities. The Tribe has appropriate laws and regulations in place in order for it to determine and distribute prevailing wages.
- (2) ☐ You will use Davis-Bacon or HUD determined wage rates when required for IHBG-assisted construction or maintenance activities.
- (3) ☐ You will use Davis-Bacon and/or HUD determined wage rates when required for IHBG-assisted construction except for the activities described below.

(4) If you checked the box in Line 3, list the other activities that will be using tribally determined wage rates:

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# Waivers and Alternative Requirements

The following statutory and regulatory waivers are authorized in PIH Notice 2021-11

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## **Application Process for IHBG-ARP Grants and Indian Housing Plan Requirements**

- To facilitate and expedite the use of IHBG-ARP grant funding for COVID-19-related purposes, HUD is waiving the requirements in Section 101(b), Section 102, and Section 103 of NAHASDA, and regulations in Subpart C of 24 C.F.R. Part 1000, including 24 C.F.R. §§ 1000.214; 1000.218; 1000.220; 1000.224; 1000.226; 1000.228; 1000.230; and 1000.232.

# Abbreviated IHP to Receive IHBG-ARP Grant Funding

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- Given the current exigent situation, applicants for IHBG-ARP grants funding will only be required to submit an Abbreviated IHP, in accordance with guidance that will be published by HUD, in order to receive an IHBG-ARP grant. An Abbreviated IHP is a more streamlined version of the regular IHP.
- These **Abbreviated IHPs must specify how the IHBG recipient will carry out activities** or projects that meet the requirements of the ARP (to prevent, prepare for, and respond to COVID-19), will allow the IHBG recipient to rely on certain information included in its previously submitted FY 2021 IHP, and provide HUD with specific information that will be requested in further guidance.
- To the extent feasible, HUD will expedite its review and approve all Abbreviated IHPs quickly to expedite awarding grant funding under the ARP. **Abbreviated IHPs that HUD fails to act on in a timely manner will not be deemed to be approved by operation of law.**



## Abbreviated IHP to Receive IHBG-ARP Grant Funding, Cont'd

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- **HUD will also accept any Abbreviated IHPs that cannot be formally adopted by an Indian Tribe or TDHE** in accordance with their normal policies and procedures for adopting IHPs, provided an official or principal of the Indian tribe or TDHE who is authorized to act on behalf of the Indian tribe or TDHE provides a statement to HUD indicating that it is not practical or safe for the Indian tribe or TDHE to assemble a board or other governing body to conduct business to secure required approvals, at the time, due to the impact of COVID-19 on operations of the Indian tribe or TDHE (or the beneficiary Indian tribe of the TDHE). The Indian tribe or TDHE should take the necessary action, at a later date, when it is feasible and safe to do so, to either ratify the Abbreviated IHP previously submitted by the official or principal, if required under its policies and procedures, or submit an amendment to the Abbreviated IHP.

## Recipients that did Not Submit an IHP in FY 2021

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- **Any Tribe or TDHE that received a FY 2021 IHBG formula allocation** but either did not submit an IHP, or whose IHP was not approved in FY 2021, and accordingly did not receive an IHBG grant in FY 2021 may still apply for IHBG-ARP to receive an IHBG-ARP grant, provided it submits an Abbreviated IHP to HUD, in accordance with further guidance that will be published by HUD.
- HUD may require additional information from these recipients but will seek to streamline the application process to ensure that funding can be awarded as expeditiously as possible, while also ensuring compliance with the ARP and NAHASDA.
- This waiver is necessary to provide an opportunity to all potential IHBG applicants that received an FY 2021 IHBG formula allocation to access this new funding to help address the ongoing crisis, regardless of whether they failed to submit an IHP in FY 2021.



# IHP Certifications

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- IHBG recipients are required to provide HUD with all required IHP certifications in their Abbreviated IHPs.
- However, if an authorized official of an Indian tribe or TDHE provides a statement to HUD indicating that it is not practical or safe for the Indian tribe or TDHE to secure **new certifications due to the impact of COVID-19 on its operations, or the operations of a beneficiary Indian tribe, HUD will, consistent with Section 103(d) of NAHASDA, accept all IHP certifications that were previously submitted and accepted by HUD for FY 2021 IHBG grants (or for FY 2020 IHBG grants for those IHBG recipients that have not yet submitted their FY 2021 IHP)**, in lieu of requiring new tribal certifications to be submitted. IHBG recipients that choose to use this alternative requirement will be deemed to have submitted such past certifications for the IHBG-ARP grant and will be bound by such certifications, accordingly.
- Under this alternative requirement, TDHEs may submit Abbreviated IHPs on behalf of their beneficiary Indian tribes without having to provide any required new IHP Tribal certifications when applying for IHBG ARP funds or amending their FY 2021 IHBG IHPs for COVID-19 related purposes.
- However, these **TDHEs are required to consult with their beneficiary Indian tribes that they serve**, in a manner that is feasible and when it is safe and practical to do so and submit any appropriate amendments or certifications to their Abbreviated IHPs if they are directed to do so by the beneficiary Indian tribe.

# Waivers and Alternative Requirements (Continued)

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## **Income Verification**

- Regulatory Authority: 24 C.F.R. § 1000.128
- Alternative requirement established that allows recipients to deviate from written admission and occupancy policies to verify income less frequently.
- Can carry out intake and other tasks remotely.



# Waivers and Alternative Requirements (Continued)

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## **Public Health Services**

- Statutory Authority: Section 202(3) of NAHASDA
- Alternative requirement established to allow for funds to be used to carry out a wide range of public health services under this category of eligible activities
- Eligible uses include:
  - **Paying the transportation costs to get IHBG-assisted families and staff of the recipient to and from a vaccination site;**
  - **Coordinating with health clinics to provide on-site vaccinations either at a Tribal or TDHE owned or operated location or at a mutually agreed upon location;**
  - **Paying the costs of providing public health information to staff and residents so they can learn about the benefits of getting vaccinated and how to get vaccinated;**
  - **Supporting IHBG-assisted families and staff with online registration for vaccination appointments and keeping them informed as vaccination efforts continue.**

# Waivers and Alternative Requirements (Continued)

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## **COVID-19-related Assistance to Non-Low Income and Non-Native Families**

- Statutory Authority: Section 201(b) of NAHASDA
- Regulatory Authority: 24 C.F.R. §§ 1000.104, 1000.106, 1000.108, 1000.110, 1000.312, 1000.314, and 1000.318
- Alternative requirements are established under the understanding that otherwise ineligible families are being assisted in order prevent the spread of COVID-19.
- **Recipients can temporarily house any individuals, regardless of Indian status or income level in tribally owned units or privately owned units.**
- Other eligible activities include providing masks, medical testing kits, food preparation, and cleaning/decontamination.



# Waivers and Alternative Requirements (Continued)

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## Useful Life

- Statutory Authority: Section 205 of NAHASDA
- Regulatory Authority: 24 C.F.R. §§ 1000.141, 1000.142, 1000.143, 1000.144, 1000.146, 1000.147
- Affordability and useful determination not required at this time for specific items
- This waiver only applies during the period that a unit is being temporarily used to prevent, prepare for, or respond to COVID-19. Useful life restrictions are required for other housing activities conducted with IHBG-ARP funding.

# Waivers and Alternative Requirements (Continued)

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## **Total Development Cost (TDC) Limits**

- Regulatory Authority: 24 C.F.R. §§ 1000.156, 1000.158, 1000.160, 1000.162
- HUD is waiving the requirements relating to limitations on cost or design standards and TDC with respect to dwelling and non-dwelling units.
- Recipient may exceed the current TDC maximum by 20 percent without HUD review or approval, and exceed 20 percent with HUD approval.
- Must be for purpose of to prevent, prepare for, and respond to COVID-19.



# Waivers and Alternative Requirements (Continued)

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## **Prohibition Against Investment of ARP Act Grant Funds**

- Statutory Authority: Section 204(b) of NAHASDA
- Regulatory Authority: 24 C.F.R. § 1000.58
- HUD is prohibiting the investment of any IHBG funding provided under the ARP Act.

# Waivers and Alternative Requirements (Continued)

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## **IHBG-ARP Funds Not Counted in Undisbursed Funds Factor**

- Regulatory Authority: 24 C.F.R. § 1000.342
- HUD will exclude IHBG-ARP funds from counting towards an Indian tribe's undisbursed IHBG funds from prior years under the Undisbursed Funds Factor (UDFF).



# Waivers and Alternative Requirements (Continued)

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## Period of Availability:

- The relief provided by the waivers and alternative requirements will apply retroactively to the date that an Indian tribe or TDHE began preparing for COVID-19, but **after January 21, 2020.**

## Continued Operations During the Covid-19 Pandemic

- The waivers implemented through this Notice provide administrative relief and allow for alternative approaches to various aspects of Tribal and TDHE operations that are necessary to expedite or facilitate the use of the IHBG-ARP funds.

# Reporting Requirements

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- **Quarterly Federal Financial Reports (SF-425)**
  - Due 30 days after the end of each quarter, including the program year's last quarter
  - Account for the receipt and disbursement of grant funding.
  - IHBG-ARP will be reported cumulatively for the life of the grant.
- **Abbreviated Annual Performance Report (APR) (Form: HUD-52735)**
  - Information regarding recipient expenditure of grant funding.
  - Separate from IHBG Formula APR.
  - Covers the recipient's typical reporting period.
  - Due to Area ONAP within 90 days of the end of the recipient's program year unless otherwise specified.
- **Additional ARP Act Reporting:** If additional reporting is necessary, further guidance will be released by the Department.



# Reporting Requirements (Continued)

## Abbreviated APR

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1. Total amount of IHBG-ARP grant funding received from HUD
2. Total amount of IHBG-ARP grant funding that was expended or obligated during the tribal program year to:
  - Prevent COVID-19;
  - Prepare for COVID-19; or
  - Respond to COVID-19
3. List of all activities for which IHBG-ARP grant funds were expended or obligated under each of the above eligible purpose categories, including:
  - The type of the activity;
  - A description of the activity, including whether the activity is:
    - Eligible under the IHBG program; or
    - An eligible activity pursuant to a waivers and alternative requirement

## Reporting Requirements (Continued)

### Abbreviated APR (Continued)

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#### 3. List of all activities for which IHBG-ARP grant funds were expended or obligated under each of the above eligible purpose categories, including (Cont.):

- An explanation of how the activity addresses one or more of the eligible purposes identified in (2), above;
- An evaluation of the completion status of the activity;
- An estimate of the number of eligible families that were assisted by this activity, including the number of low-income Indian families, non-low-income Indian families, and non-Indian families that were assisted by the activity;
- The name of the person to contact at the Tribe or TDHE if there are concerns with; or Questions about the activity.



# ALASKA ONAP

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- Hire staff person to coordinate with local tribes to maximize the use of various streams of CARES Act funding.
- Rehabbing on vacant units for quarantine housing
- Upgrade IT structure to allow TDHE/Tribal employees to work remotely
- Payment assistance for mortgage payments
- Payment assistance for renters
- Utility assistance for renters and homeowners

# ALASKA ONAP

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- Temporary rental assistance so people can stay in hotels for the 14-day quarantine period
- Rehab of privately owned homes for ventilation and improved water and sewer access
- Purchase of PPE for communities
- Purchase of cleaning and disinfectant for communities
- Food service to help families in quarantine



# NORTHWEST ONAP

- Lummi Nation

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- Increasing broadband and Wi-Fi access on reservation so residents are able to access school, telemedicine, and continue working virtually.
- Making mental health counseling available to residents who are experiencing additional stress and anxiety due to loss of employment, childcare issues,

- Spokane Tribe

- Providing microwave internet (due to remoteness of reservation) to housing areas that do not have access to the internet so residents are able to access school, telemedicine, and continue working virtually.
- Construction of a bathroom facility at the Tribe's powwow grounds which have been designated as a quarantine site.

- Muckleshoot Housing Authority

- Upgrading housing office systems to “the cloud” to facilitate staff's ability to telework.

# NORTHWEST ONAP

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- Confederated Tribes Coos, Lower Umpqua, and Siuslaw Indians- The tribe will convert 2 vacant 2 bedroom rental units for use as emergency/quarantine units. The units will be used to shelter homeless Tribal members during COVID-19 pandemic. The units may also be used as a quarantine location for tribal members diagnosed with the COVID-19.
- Fort Hall Housing Authority- Purchase manufactured homes to be used as quarantine units.
- Kootenai Tribe- The Housing Department will install sanitation stations in common areas of housing-related public facilities and other public spaces such as playgrounds, administration office, and gymnasium.

# SOUTHWEST ONAP

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- Purchasing laptops and other communication devices to help staff and residents stay in touch with what's going on in their community's
- Providing tenant-based rental assistance for tribal members where needed throughout the country.
- Rehabilitation of facilities and homes to help protect tribal members from COVID 19
- Conversion of housing units to provide locations for isolation/quarantine purposes



# SOUTHWEST ONAP

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- Purchase Modular rental units to alleviate over crowdedness
- Maintenance /sanitization of managed housing Units.
- Assist tribal members with housing mortgages through their lenders.
- Relocation assistance and/or temporary housing for families due to homelessness and over crowdedness.
- Provide/deliver food boxes to tribal members

# NORTHERN PLAINS ONAP

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- Set-aside of assisted housing units for quarantine purposes (both for individuals exposed to the virus or actually diagnosed with the virus);
- Small scale development of units for temporary quarantine purposes (tiny homes);
- Rehabilitation of existing units to reduce overcrowding;
- Infrastructure projects to prevent homelessness (projects that were negatively impacted by rent reductions due to COVID-19);
- Increase in tenant-based rental assistance for social distancing/quarantine purposes or to provide rent relief to impacted families.

# SOUTHERN PLAINS ONAP

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- Kickapoo Tribe of Oklahoma Housing Authority: Obtain the services of a consultant to write emergency policies to deal with a pandemic. This will include training for staff.
- Seminole Nation Housing Authority: Provide internet services to rural families that do not currently have access. This will allow families to have virtual doctor's appointments and access to school activities.
- United Keetoowah Band of Cherokees: Emergency housing via hotel/motel for those needing to quarantine and for emergency personnel to isolate such as first responders and medical personnel.



# SOUTHERN PLAINS ONAP

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- Chickasaw Nation: Construct six single family units for homeless and/or veterans impacted by COVID-19.
  - Provide rental subsidies for Chickasaw citizens that are eligible tribal families throughout the United States renting from third parties.
  - Provide a one-time utility subsidy of \$500 to Chickasaw citizens throughout the United States impacted by COVID-19.
- Muscogee Creek Nation: Construction of an office at the Elder's rental property to provide for social distancing.

# EASTERN WOODLANDS ONAP

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- Telework equipment so staff can work from home, Computers, MyFi, Fiber optic cable, other technical equipment to allow telework
- Preparation of quarantine units
- Payment of rent for tenants in private rentals,
- Mortgage relief programs, (ltd amounts)

# EASTERN WOODLANDS ONAP

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- Utility payments for tenants who are laid off or lost income.
- Vehicle purchases for food delivery to tenants and elders, maintenance due to one per vehicle (social distancing) & delivery of PPE to tenants/homeowners
- Cell towers, for Tribal communities for telecommunication
- Renovation or expansion of Food Distribution Centers



# General Resources

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ONAP COVID-19 Recovery Programs website:

[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/ih/Covid\\_Recovery\](https://www.hud.gov/program_offices/public_indian_housing/ih/Covid_Recovery)

IHBG-ARP Waivers and Alternative Requirements, PIH Notice 2021-11

[https://www.hud.gov/sites/dfiles/OCHCO/documents/2021-11pihn.pdf?utm\\_medium=email&utm\\_source=govdelivery](https://www.hud.gov/sites/dfiles/OCHCO/documents/2021-11pihn.pdf?utm_medium=email&utm_source=govdelivery)

ONAP website, including updated COVID-19 related Frequently Asked Questions:

<https://www.hud.gov/codetalk>

HUD COVID Resources and Fact Sheets: <https://www.hud.gov/coronavirus>

# Technical Assistance

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Please contact your ONAP Area Office for technical assistance.

# IHBG-ARP Implementation Training

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Conclusion and Wrap Up

Questions?

Comments?