

**IHBG COMPETITIVE NOFO**  
**FREQUENTLY ASKED QUESTIONS**  
**Indian Housing Block Grant (IHBG) Competitive Program**  
**FAQs**

Updated: 12/15/2022

For any questions, please contact: [IHBGCompetitiveProgram@hud.gov](mailto:IHBGCompetitiveProgram@hud.gov)

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**Section I.A. Program Definitions**

**Q1: Can the applicant determine the definition of low-income family, or do we need to follow NAHASDA definition of low-income family?**

An applicant may not determine their own definition of low-income family. As stated in Section I.A, the definitions in NAHASDA and in the IHBG program regulations at 24 CFR 1000.10 apply. Therefore, the definition of “low-income family” in NAHASDA Sec. 4(14) remains applicable to the IHBG Competitive program. The term ‘low-income family’ means a family whose income does not exceed 80 percent of the median income for the area.

**Section III. Eligibility Information**

**Q1: Is it possible to apply for this grant as an individual?**

No, individuals may not apply for this grant. Only Tribes and Tribally Designated Housing Entities (TDHEs) are eligible to apply for IHBG competitive funds.

**Q2: If the Tribe has never received formula funding, but the TDHE has, is the Tribe eligible to apply directly?**

Yes. Since the TDHE has previously been allocated formula funding on behalf of the Tribe, both the Tribe and the TDHE are eligible to apply; however, a tribe that authorizes a TDHE to apply on its behalf may not also submit its own application for funding

**Q3: If the Tribe is the applicant, can it enter into a subaward agreement with the TDHE to implement grants management duties?**

Yes, language was added to this year’s NOFO clarifying that eligible applicants may subaward to other entities and there is nothing in NAHASDA, or 24 CFR part 1000 that prohibits a Tribe from issuing a subaward to the TDHE. In this instance and in accordance with the NOFO, HUD will review, and award points based on the Tribe as “the applicant” for this competition. Additionally, if the Tribe proposes to subaward grants management duties to the TDHE, it may explain this arrangement as part of its “assessment and plan for addressing identified gaps in capacity for managing and implementing the proposed project” in Subfactor 1.1 “Managerial and Technical Staff” (pages 32-33).

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**Q4: Can you share what is meant by "model activities," which are referenced as ineligible under this NOFO?**

Model activities are housing activities under model programs that are designed to carry out the purposes of NAHASDA, but do not clearly fall into the eligible activities categories in NAHASDA Sec. 202(1) through (5). Model activities are ineligible under this NOFO (See Section IV.F., Funding Restrictions, #1 "Eligible Activities").

**Q5: Can Tribes apply for IHBG Competitive on their own if they have a TDHE, or must Tribes apply through their TDHE?**

Generally, Tribes do not need a TDHE to apply for the IHBG Competitive program. However, in Alaska, there are certain Tribes that are required to apply through their assigned HA/TDHE. For reference regarding Alaska Tribes, please review page 13 of the NOFO.

**Q6: Is there a requirement that tribal members apply for housing through their TDHE in order for the TDHE to be able to apply for IHBG Competitive?**

No. There is no requirement in the NOFO that a tribal member must apply for housing through their TDHE for the TDHE to apply for IHBG Competitive.

### [Section III.D. Threshold Eligibility Requirements](#)

**Q1: If multiple projects are being proposed in an application does each project require a separate narrative?**

No. Each eligible applicant may only submit one application under this NOFO. The application may propose one project or multiple projects. If the applicant proposes multiple projects, HUD will evaluate all projects covered in the application together and will not separately score each project proposed (see NOFO, III.D.4, pages 15-16). The NOFO limits the application's Workplan Narrative to 30 pages (see NOFO, Section III.D.7, p. 16), which does not include supporting attachments.

**Q2: Can a TDHE submit a separate application for each Tribe that it serves?**

No. When a TDHE serves as an umbrella organization for multiple Tribes the TDHE may only submit one application under this NOFO. See NOFO, Section III.D.4. The applicant may propose one project or multiple projects. So, a TDHE could submit an application that proposes projects for more than one Tribe.

**Q3: What is the Workplan Narrative?**

The Workplan Narrative is the response to all five rating factors listed in Section V of this NOFO and encompasses the proposed IHBG Competitive project(s). HUD will not review applications with Workplan Narratives that do not comply with the following requirements of the NOFO:

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1. Maximum 30 pages (excluding supporting attachments and required forms);
2. Double-spaced.
3. Letter-sized paper, 8-1/2 x 11 inches;
4. Times New Roman 12-point font; and
5. At least 1-inch margins on all sides.
6. Footnotes may follow the standard footnote format of 10-point font and single-spaced.
7. Tables may be single-spaced (in Times New Roman 12-point font).

**Q4: Is some sort of acknowledgement of threshold items required in the narrative?**

No.

**Q5: Are tables subject to the same font requirements as the Workplan Narrative?**

Yes. Tables should be used sparingly. Do not use tables to respond to all of the rating factors. HUD will not accept a workplan narrative submitted entirely in table format in the grant application. Please go to page 16, at Section III.D.7. of the NOFO for full details.

**Q6: How do we address the civil rights matters on pages 14-15 of the NOFO? Do the assurances address it, or do we need to make a separate statement that we do not have any violations?**

Civil rights matters will be reviewed and evaluated by HUD. No separate statement will be necessary to address civil rights matters.

### Section IV. Application and Submission Information

**Q1: How do you download the application package from the [grants.gov](https://www.grants.gov) website?**

the IHBG Competitive grant opportunity is available here:

<https://www.grants.gov/web/grants/search-grants.html?keywords=FR-6600-N-48>. Once you have opened the IHBG Competitive grant opportunity page:

1. Click on the “Package” tab.



2. Click on “Preview” (under “Action” column) (right-hand side of the page).

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CFDA	Competition ID	Competition Title	Opportunity Package ID	Opening Date	Closing Date	Actions
14.857	FR-6500-N-48	Indian Housing Block Grant (IHBG) - Competitive Grant Program	PKO00268714	08/24/2021	12/01/2021	<a href="#">Preview</a>   <a href="#">Apply</a>

3. Click on Download Instructions. “Open” when message appears on the bottom of page.

Mandatory Forms (Click to Preview)	Optional Forms (Click to Preview)
<ul style="list-style-type: none"> <li>» <a href="#">Application for Federal Assistance (SF-424) [V2.1]</a></li> <li>» <a href="#">Disclosure of Lobbying Activities (SF-LLL) [V1.2]</a></li> <li>» <a href="#">HUD Applicant-Recipient Disclosure Report [V1.1]</a></li> </ul>	<ul style="list-style-type: none"> <li>» <a href="#">Attachments [V1.2]</a></li> <li>» <a href="#">Grants.gov Lobbying Form [V1.1]</a></li> </ul>

Please make sure that you are using the required forms that are provided on grants.gov as you prepare and complete your grant application.

### Q2: Who should sign the SF-424?

For an application under this NOFO to be complete, the applicant must sign the SF-424. The SF-424 must be signed by the applicant’s Authorized Representative (e.g., Tribal Chief, TDHE Executive Director, etc.) and should not be the same person listed as the Key Contact in Block 8f of the SF-424. For further SF-424 instructions, see NOFO, Section IV.B.2.a., p. 21.

### Q3: Is the applicant required to post the application for a public comment period?

No.

### Q4. I intend to use a few maps and a few photographs to illustrate our project in context. Will these be counted toward the 30-page limitation?

No. Supporting attachments do not count towards the Workplan narrative 30-page maximum. See NOFO, Section III.D.7, page 16 which states that the 30-page maximum excludes supporting attachments.

However, Section IV.B.2.g., page 22 establishes that Workplan Narrative Supporting Attachments must not exceed 150 pages. Supporting attachments submitted beyond the first 150 pages will not be reviewed. Therefore, any maps and photographs submitted as Workplan Narrative Supporting Attachments will be counted towards this 150-page limit.

### Q5: Is the “Certification of Compliance” (NOFO Section IV.B.2.j., page 23) submitted as a separate document?

Yes, applicants must submit the Certification of Compliance form as a separate document, signed by their authorized official. HUD recommends that the applicant submit this certification on its own letterhead as well. This threshold submission is a non-curable deficiency.

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**Q6: If an applicant is applying for multiple projects, does it have to submit an Implementation Schedule (HUD-53247), Cost Summary (HUD-53246), Workplan Narrative, and Budget Narrative for each project?**

No, an applicant is not required to submit these application materials separately for each project. However, an applicant may choose to submit this information separately based on its preference and in accordance with the requirements of each submission item. Applicants are reminded that only one Workplan Narrative can be submitted, and that the Workplan Narrative is limited to 30 pages.

Regardless of the submission format, HUD will evaluate all projects covered in the application together and will not separately score each project proposed, as stated under Threshold Factor #4, "Number of Applications and Eligible Activity Project(s)." (NOFO Section III.D.4., pgs. 15-16.)

**Q7: Is the "Environmental Review – Expression of Intent" (NOFO Section IV.B.2.I., p., page 24) submitted as a separate document or is this described in the Workplan Narrative?**

The "Environmental Review – Expression of Intent" is a separate standalone document, which must be included in the application.

**Q8: If you have an approved indirect cost rate, do you have to use it, or can you opt to use the de minimis indirect cost rate?**

If you have an approved indirect cost rate, you must use it. See 2 CFR 200.414(f) and (g). Any non-Federal entity that has never received a negotiated indirect cost rate may elect to charge a de minimis rate of 10% of modified total direct costs, which may be used indefinitely. If chosen, this methodology must be used consistently for all awards until such time as a non-Federal entity chooses to negotiate for a rate.

**Q9: If the applicant has a Federally negotiated indirect cost rate, but the approved rate itself exceeds 20%, can it still charge these costs as part of the administrative and planning expenses?**

Yes, as long as a copy of the rate is submitted with the application. In accordance with 2 CFR 200.414(c) located in the Cost Principles, HUD must accept a Federally negotiated indirect cost rate. The NOFO does not establish a cap on the indirect cost rate. The NOFO does cap administrative and planning expenses, in accordance with IHBG regulations and as discussed in Funding Restriction-Indirect Cost Rate-Section IV.F. page 29. Any requested indirect costs charged in accordance with a Federally negotiated rate that are also administrative and planning costs will count as a line item towards the overall administrative and planning cap.

**Q10: Can an applicant with a Federally negotiated indirect cost rate agreement change the amount of indirect costs it would charge as part of administrative and planning expenses? Can it choose not to charge any indirect costs at all?**

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Yes, but only if it does not exceed the maximum amount allowed under its indirect cost rate agreement.

It is up to an applicant whether to budget up to the maximum indirect cost rate amount allowable under its Federally negotiated indirect cost rate or less than the full amount. Additionally, an applicant can choose not to charge any indirect costs at all, even if it has an approved rate.

An applicant cannot request an amount that exceeds that the maximum amount allowed under its rate, but it can choose to request less or none at all. If the applicant is budgeting less than the maximum amount it is allowed under its indirect cost rate agreement, then it may indicate that it is choosing to do so in its budget narrative.

**Q11: Program Guidance No. 2002-06 states that TDHEs are not required to submit their indirect cost rate plan for approval, so there is often no documentation from HUD showing the approved rate. TDHEs are required only to retain their plan and have it available for HUD review upon request. What are you expecting to see as an approval of the indirect rate?**

If requesting funds which include indirect costs, the applicant will be required to submit documentation to show an approved federally negotiated rate. As stated in the NOFO, the applicant must include a letter stating the approved rate and distribution base or other documentation from the cognizant agency showing the approved rate (pg. 29). If the applicant does not have an approved federally negotiated rate, submit a statement which indicates the applicant will use the de minimis rate of 10 percent of Modified Total Direct Costs (MTDC), in accordance with 2 CFR 200.403.

**Q12: Are applicants allowed to submit an expired indirect cost rate while negotiating for a new rate?**

Yes. Also, if needed, applicants can use a provisional rate or de minimis rate, in accordance with 2 CFR 200.414.

**Q13: Would you prefer that the Workplan Narrative Supporting Attachments be put in one file? Then just reference the page number? Or, as separate attachments with referenced page numbers?**

Except for the 150-page limit, there are no restrictions to the format of the Workplan Narrative Supporting Attachments which can be submitted as one or multiple files. Please label each page of each attachment with a page number and reference the applicable Rating Factors and Subfactors in the NOFO.

**Q14: Does the Budget Narrative count against the 150-page attachments limit? And what is the page limit for the Budget Narrative? Can it be conveyed in an excel spreadsheet?**

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No. The Budget Narrative is submitted separately from the Workplan Narrative in response to Subfactor 3.4 (Budget) and does not count against the 150-page attachment limit. There is no page limit on the Budget Narrative.

Yes, an excel spreadsheet may be used. There are no formatting restrictions on the Budget Narrative. See NOFO under the Budget Narrative submission requirement (h) Budget Narrative, p.23 and Subfactor 3.4, pgs. 53-54.

**Q15: Since the Workplan Narrative is limited to 30 pages, can the applicant provide a summary project implementation schedule in the narrative and include a more detailed schedule as an attachment or is it advisable to include the detailed implementation schedule in the narrative?**

Attachments within the 150-page limit are acceptable. However, please be advised that the criteria listed in the NOFO on pgs. 51-52 regarding the Implementation Schedule must be clearly addressed in the Workplan Narrative in response to Subfactor 3.3 (Project Implementation Schedule and Project Readiness).

**Q16: If the applicant is using a contractor/consultant grant writer to help prepare the application, can the contractor/consultant be listed as the Key Contact (Block 8f) and Authorized Representative (Block 21) on the SF-424?**

No. The NOFO specifies not to list a non-employee such as a contractor/consultant, grant writer as the Key Contact (Block 8f). For Block 21 on the SF-424, the applicant's Authorized Representative should be listed, not the contractor/consultant, or grant writer.

**Q17: Will HUD accept the forms from the Indian Community Development Block Grant (ICDBG) NOFO (Cost Summary-HUD-4123 and Implementation Schedule-4125)? Would these forms be a curable deficiency?**

No, HUD will not accept the ICDBG forms. Under "Submission for All Projects" on pgs. 20-21, it specifies that "Submitted incorrectly, includes documents or forms that are blank, or forms for other competitive grant programs (e.g., Indian Community Development Block Grant), or that have file extensions that are incompatible with Grants.gov." Since these forms are not a curable deficiency, submitting the ICDBG forms would result in the disqualification of the application and will not be evaluated.

Please note that the correct Implementation Schedule – 53274 will clearly state that it is intended for the IHBG competitive funds as will the Cost Summary – 53246.

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<p><b>Implementation Schedule</b> Indian Housing Block Grant <small>NOTE: This form is intended for use only by awardees of competitive IHBG funds.</small></p> <p><b>Cost Summary</b> Indian Housing Block Grant <small>NOTE: This form is intended for use only by awardees of competitive IHBG funds.</small></p>	<p>U. ar Of</p>
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The current IHBG forms are included with the [grants.gov](https://www.grants.gov) application package and are also uploaded to IHBG Competitive CodeTalk site:

[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/ih/grants/ihbg\\_cgp](https://www.hud.gov/program_offices/public_indian_housing/ih/grants/ihbg_cgp)

**Q18: For the “Certification of Compliance,” can all seven components be included in one document or are seven documents required?**

Yes, all seven components should be addressed in a standalone document signed by an authorized official.

**Q19: On the SF-424 should leveraged IHBG formula funds be in the line for "Applicant" or "Other"?**

Please see Section IV.B.2.a., page 21 of the NOFO, which states that lines 18b-18f must list any proposed leveraged funds. Any federal funds proposed as leverage (e.g., IHBG formula) should be listed in line 18e, “Other.”

**Q20: The Implementation Schedule (HUD-53247) and Cost Summary (HUD-53246) have an expiration date of November 30, 2022. Can these forms still be used for the grant submission?**

Yes. Both forms can be used for the FY 2022 IHBG Competitive grant submission while they are awaiting OMB approval.

**Q21: We are having issues updating our System of Award Management (SAM's) registration, which is no longer active. SAM's indicated the issue is their fault and are working on getting it fixed. If our registration is not fixed by the deadline, can we still submit the application?**

Yes. Grants.gov will accept an application submission if an expired SAM’s registration is not fixed by the submission deadline.

**Q22: Are we required to submit attachments of the signed SF-424B and SF-424D?**

Yes. According to the NOFO, applicants are required to submit both the SF-424B and SF-424D.



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### Section IV.D.4. Corrections to Deficient Applications (Technical Deficiencies)

#### **Q1: Who is the applicant's point of contact to resolve any technical deficiencies?**

The NOFO specifies that HUD will notify the Authorized Representative by email when HUD identifies a curable deficiency (see "Corrections to Deficient Applications," NOFO Section IV.D.4, pgs. 27-28). HUD will also notify the Key Contact that the applicant has named in their application (Form SF 424, item 8.f). Therefore, it is important that your points of contacts monitor their emails and provide correct and accurate contact information.

#### **Q2: Where will notification come from and go to for technical deficiencies? Will the AONAP be copied on these requests?**

HUD will notify the Authorized Representative as provided by the applicant in Form SF-424, as well as the Key Contact listed in Section 8.f of Form SF-424 via email. The Area ONAP will not be copied on technical deficiency notifications.

#### **Q3: How will HUD send out deficiency notifications to applicants?**

HUD will notify applicants of each curable deficiency by email only. Notification emails will be sent to the Authorized Representative identified on the Form SF-424 (Section 21) and the Key Contact identified on the Form SF-424 (Section 8.f).

### Section IV.D. Application Submission Dates and Times

#### **Q1: Was the due date of this opportunity revised?**

Yes. The application deadline was extended from November 17, 2022 to 11:59:59 p.m. Eastern Standard time on January 24, 2023.

### Section IV.F. Funding Restrictions

#### **Q1: Is the cap on administrative and planning costs determined by considering the grant award amount, or the total project cost (including leverage)?**

The cap on administrative and planning expenses is based on the amount of the grant award, not the total project cost (NOFO Section IV.F.2., p. 28). Applicants that are awarded a grant under this NOFO in excess of \$500,000 may use up to 20 percent of the grant award for IHBG-eligible administrative and planning expenses. Recipients awarded a grant in the amount of \$500,000 or less may use up to 30 percent of the grant award for these costs.

#### **Q2: Can you pay off a loan for land with IHBG competitive funds, if you purchased the land with a loan before you submitted the application to ensure you have the land tied up?**

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No. As stated in the “Pre-award costs” of the NOFO (Section IV.F.3., p. 28), “with the exception of proposal costs incurred to prepare an application for submission under this NOFO and the value of land acquisition used towards an applicant’s leveraging contribution as discussed in Rating Factor 4, all costs, including leveraging resources, must be incurred within the period of performance dates established in the IHBG competitive grant agreement.” For further information regarding acceptable land valuation methods, see pgs. 56-57 of the “Firm Commitment Documentation Needed” chart in Rating Factor 4.

### **Q3: Can you please clarify administrative and planning expenses?**

Administrative and planning expenses include, but are not limited to, costs of overall program and/or administrative management, coordination of monitoring and evaluation, and preparation of reports. For more information, please see 24 CFR 1000.236-238 and NOFO Section III.F., Funding Restrictions, p. 28.

### **Q4: Can HUD funds be used for environmental reviews?**

Yes, Administrative and Planning funds can be used for expenses for environmental reviews.

## **[Section V.A.1. Rating Criteria: Rating Factor 1-Capacity of the Applicant](#)**

### **Q1: Is there a limit on the number of staff to include for Subfactor 1.1?**

The NOFO requires a description of the knowledge and experience of the key staff that will plan, manage, and implement the projects. There is no limit on the number of staff, but the description should be limited to key team members. The NOFO specifies not to list tribal organizations, contractors, or consultants when describing the recent, relevant, and successful experience requirements for this Subfactor. Also, keep in mind that the Workplan Narrative is limited to 30 pages. See NOFO Section III.D.7., p. 16.

### **Q2: Subfactor 1.1 of the NOFO states that “the applicant must also provide a detailed assessment and plan for addressing identified gaps in capacity for managing and implementing the requested” funds (page 32). Can you elaborate on what all this entails?**

To address this NOFO requirement, the applicant should assess the staffing needs of the proposed project, and the capacity of current staff. If there are staffing needs that cannot be met by current staff, that is considered a gap, and the applicant should discuss how that gap will be addressed (e.g., hiring more staff, working with a contractor/consultant to address any staff capacity gaps, etc.). The applicant should discuss timelines and methods for identifying and bringing on qualified staff.

Finally, if there are no gaps, the applicant must confirm that there are no gaps in capacity in its response to this Subfactor.

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### **Q3: What information is HUD looking for to address Subfactor 1.2 Procurement and Contract Management?**

To address this Subfactor, the applicant should discuss in detail *how it is implementing* its policies and procedures in accordance with *each* of the regulatory requirement named in the NOFO:

General procurement standards in 2 CFR 200.318 - 327 (excluding 200.322), as modified under 24 CFR 1000.26; Indian and Tribal preference at 24 CFR 1000.48-1000.54; and Conflict of interest at 24 CFR 1000.30.

The applicant should not simply provide a copy of its procurement policies and procedures, but rather should describe how its implementation policies and procedures are consistent with the applicable procurement requirements.

### **Q4: What is an example of outdated references?**

The citations in 2 CFR 200 changed when those regulations were updated on August 13, 2020, November 12, 2020, and February 22, 2021. Outdated references refer to number citations for requirements that were accurate before 2 CFR 200 was updated but have been renumbered as a result of the 2 CFR 200 update. An example would be under the previous version of 2 CFR 200, the Bonding requirements appeared at 2 CFR 200.325. Since part 200 was updated, however, the Bonding requirements provision has been renumbered and is now at 2 CFR 200.326.

### **Q5: If the Tribe is the applicant for this NOFO but under the IHBG formula program it designates a TDHE to receive and administer its IHBG grants on the Tribe's behalf, how will points be assessed under Subfactor 1.3 IHBG Expenditures and Subfactor 1.4 Findings?**

Because the TDHE administers the IHBG formula program on behalf of the Tribe, and the Tribe oversees the performance of its TDHE to ensure that it is serving the Tribe's needs, HUD will assess points for Subfactors 1.3 and 1.4 based on the performance of the TDHE under the IHBG formula program.

### **Q6: If an applicant is approved to invest its IHBG formula funds, but only invests a small portion of its total formula grant funds, is the applicant still required to use Category 2 in Subfactor 1.3 IHBG Expenditures?**

Yes. The NOFO states that applicants approved for and investing IHBG formula funds will be rated under Category 2. See NOFO, Subfactor 1.3, Category 2, page 36.

### **Q7: Should applicants respond to Subfactor 1.3. IHBG Expenditures, Category 1, and 1.4. Findings in the narrative? Or will HUD rely on its own records only?**

For Subfactor 1.3, Category 1, the applicant may need to respond. HUD will rely on its own records to evaluate the expenditure of IHBG formula funding received in the last three Federal fiscal years (2019-2021) in comparison with the amount of undisbursed IHBG funds remaining in LOCCS on the date the NOFO was published. If the applicant has an undisbursed balance that is

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more than 25% of the IHBG formula cumulative amounts that it received for the last three Federal fiscal years, the applicant must include a justification demonstrating well-developed plans to accumulate IHBG funds to carry out a specific activity in the future to qualify for full points under this Subfactor. See NOFO Subfactor 1.3 IHBG Expenditures, page 35. For Subfactor 1.4, HUD will rely on its own records.

### **Q8: How will Single Audit findings impact an applicant's score?**

The NOFO requires that applicants must not have any Single Audit findings pertaining to financial management, accounting, and internal controls for HUD-ONAP programs during the rating period of October 1, 2018, up to and including the NOFO publication date of July 26, 2022. If there are any Single Audit findings in these areas, the application will receive zero points under "Subfactor 1.4. Findings" (see NOFO, Section V.A.1, pages 36-37).

### **Q9: If an applicant has an established relationship with an organization that would be handling some aspect of the project, can the applicant list the experience of the organization?**

No. The NOFO specifies not to list tribal organizations in this Subfactor. Review of capacity will be limited to the knowledge and experience of the key staff of those who will be working directly on the IHBG Competitive grant award and addressing whether there are any potential gaps in capacity.

### **Q10: If an applicant does not have internal staff capacity but plans to work with a contractor/consultant or subaward to help plan, manage, and implement the project, can the contractor/consultant or subrecipient be included in Subfactor 1.1. Managerial and Technical Staff? Does the applicant then need to address recent, relevant, and successful?**

Subfactor 1.1 states that "The applicant must also identify whether there are any potential gaps in capacity for managing and implementing the proposed project. If there are identified gaps, the applicant must provide a detailed assessment and plan for addressing the identified gaps."

If an applicant has identified gaps in capacity based on its current staff, it may address its plans to work with contractors, consultants, subrecipients, etc. as part of its "detailed assessment and plan for addressing the identified gaps."

The NOFO does not require applicants to address recent, relevant, and successful as part of this gap in capacity analysis. This criterion is only applicable to the applicant's own key staff that will plan, manage, and implement the IHBG Competitive Grant.

### **Q11: Does having a finding exclude a Tribe/TDHE from applying?**

No. A Tribe/TDHE may still apply if it has findings. If the applicant has findings, HUD will review and assign points according to the criteria in Subfactor 1.4 (Findings). Applicants that have had outstanding HUD-ONAP monitoring, HUD-OIG, and GAO findings during the rating period (between October 1, 2018, to July 26, 2022) or have Single Audit findings pertaining to financial

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management, accounting, and internal controls for HUD-ONAP programs during the rating period, will have points deducted, in accordance with the NOFO.

**Q12: How will the applicant determine what the amount of undisbursed funds were remaining in LOCCS for the last three Federal Fiscal Years (FY19, FY20, and FY21)?**

IHBG formula recipients may contact their Area Office Grants Management Specialist if they have questions regarding any undisbursed formula amounts remaining in LOCCS for FY 19-21.

**Q13: Should an applicant include information in the Workplan Narrative on timely reporting, in response to Subfactor 1.5?**

No. Applicants should neither submit supporting attachments nor address this Subfactor in their Workplan Narrative as HUD will utilize its records to verify.

**Q14: Please clarify the rating periods of the FY 2021 IHBG Competitive grant review for Subfactor 1.4 (Findings), Subfactor 1.5 (Timely Reporting), and Subfactor 1.6 (Single Audit Submission).**

Rating periods for the required Subfactors are:

Subfactor 1.4 (Findings) – October 1, 2018, to July 26, 2022.

Subfactor 1.5 (Timely Reports) – July 27, 2020, to July 26, 2022.

Subfactor 1.6 (Single Audit Submissions) – July 27, 2020, to July 26, 2022.

**Q15: Regarding Subfactor 1.4 Findings, if an applicant lost points for findings in a previous competition and those findings are still within this NOFO's rating period, will the applicant lose points again?**

Yes.

**Q16: Is a SF-425 (Federal Financial report) considered late by ONAP if it is not completed totally and accurately (e.g., missing a signature) upon submission?**

No. If the SF-425 was initially submitted on time, the corresponding ONAP Area Office will contact the applicant to confirm and correct the noted deficiencies on the report.

**Q17: Do we use the original publication date of July 26, 2022 or the revised publication date of September 30, 2022 for Subfactor 1.4 Findings and Subfactor 1.5 Timely Reporting?**

Although the application deadline was extended, the NOFO publication date was not revised. Please use the original publication date of July 26, 2022.

**Q18: Is it considered a capacity gap if the applicant has identified Architectural/Engineering (A/E) as key staff, and needs to hire an A/E firm to advertise and select construction contractors to build new housing?**

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Yes. As stated in the NOFO at Section V.A.1., pages 32-33, applicants are required to identify key staff, and to address any gap in capacity regarding key staff missing for the project.

**Q19: If the applicant is purchasing land, is the real estate agent considered as a key staff person?**

Although the applicant identifies key staff, a real estate agent should not be considered key staff. Key staff are those that will contribute directly to the proposed project described in the application.

**[Section V.A.1. Rating Criteria: Rating Factor 2-Need](#)**

**Q1: Is Subfactor 2.3, “Past Efforts to Address Identified Need” designed to award more points to an applicant that has recently pursued a project?**

No. The purpose of Subfactor 2.3 is for the applicant to describe why it is an opportune time to actively pursue the proposed project. Also, HUD is looking for a discussion on any past efforts or potential barriers towards implementing the proposed project.

Points will be awarded based on the detail provided in answering the Subfactor criteria, not on the timeframe elapsed since an applicant has pursued the project or similar activity.

**Q2: Do each of the need factors under Subfactor 2.1.a Identified Needs have to be addressed to get the full points?**

No. Applicants will receive the full points if all of the components of the identified needs statement are addressed. The NOFO states that the applicant is not required to address all the factors listed (#1-7 in the NOFO) but instead must identify only the factors that are relevant to its proposed project or activities. The first component of the needs statement that an applicant should address is identifying which of the listed need factors apply to the proposed project. The applicant should only address the factors that are relevant to the proposed project. The second component of the needs statement that an applicant should address is explaining how the project will address the identified need factors See NOFO, Subfactor 2.1.a, pages 39-40.

**Q3: Can you explain how Subfactor 2.1.a and Subfactor 2.1.b are different?**

Subfactor 2.1.a involves identifying the needs and explaining how the project will address the identified needs. Subfactor 2.1.b involves backing up the identified needs from Subfactor 2.1.a. with supporting data. Applicants must ensure that they are using the data sources identified in Subfactor 2.1.b, pages 40-41, to support the needs identified in Subfactor 2.1.a.

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**Q4: Why is HUD using factors from the IHBG Formula for Subfactor 2.1.a? Why tie comprehensive plans to the project, which will depend on much different data than the formula needs?**

Rating Factor 2: Need/Extent of the Problem is designed to get applicants to identify their needs, and to describe how the proposed project(s) will address those needs. Some or all of the factors listed in Rating Factor 2.1.a should be addressed by the applicant. While applicants are not required to discuss their needs as they relate to long-term comprehensive plans for housing, infrastructure development, economic development, and related issues, HUD strongly encourages applicants to do so.

**Q5: For Subfactor 2.2, what should the applicant use as supporting documentation to demonstrate eligible families will benefit?**

If eligible families that will benefit from the proposed project have been identified, the applicant must provide supporting documentation. See NOFO Subfactor 2.2, page 41-42. Applicants can provide documentation demonstrating that they have identified low-income families eligible to receive IHBG assistance, such as a waitlist with PII removed, but income included.

**Q6: If the applicant meets the minimum needs funding criteria, how is it supposed to address Subfactor 2.1.a based on the certification in its Indian Housing Plan (IHP)?**

In accordance with 24 CFR 1000.328, any Tribes that are designated “minimum needs” (receiving less than \$200,000 under the Formula Current Assisted Stock (FCAS) of the IHBG Formula for the fiscal year) must certify the presence of any households at or below 80 percent of median income in the formula area in its IHP.

If the applicant meets this formula criteria, then for Subfactor 2.1.a., it must describe how the proposed project or activities will address the needs of the low-income households (at or below 80 percent of median income in the formula area) that are covered under its IHP. This description is in lieu of addressing factors #1-7 listed in Subfactor 2.1.a.

**Q7: Is the data on American Indian Alaska Native (AIAN) households, Housing Shortage, etc. posted on HUD’s website? Can applicants provide HUD’s own data for FY 2022 allocations?**

Data pertaining the need factor categories identified in Subfactor 2.1.a. (Identified Needs) can be located on HUD ONAP’s main website CodeTalk under Indian Housing Block Grant (IHBG) Program/IHBG Formula link:

[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/ih/codetalk/onap/ihbgformula](https://www.hud.gov/program_offices/public_indian_housing/ih/codetalk/onap/ihbgformula)

Applicants must use the data used by HUD to calculate the **FY 2022** final IHBG formula allocations for Subfactor 2.1.b. (Other Supporting Data) in the workplan narrative.

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If needed, applicants can use data from the final published U.S. Decennial Census and American Community Survey (ACS) to support need factors identified in response to Subfactor 2.1.a. Applicants can view the data [www.census.gov](http://www.census.gov).

**Q8: On pages 40-41 under 2.1.b. to meet the requirement – “A copy of all supporting data...must be included in the application.” Does HUD want to see a screenshot or a copy of the Excel spreadsheet that shows the supporting data? Or can the applicant insert the data into the narrative?**

The supporting data documentation may be included in the Workplan Narrative to address the need factors identified in Subfactor 2.1.a. Supporting data may also be identified in the Workplan Narrative and included as a Workplan Narrative Supporting Attachment.

**Q9: Can other sources of data be used for Subfactor 2.1.b if it is referenced correctly in the narrative and submitted as supplemental attachments?**

The only acceptable sources of data for Subfactor 2.1.b are final published U.S. Decennial Census, American Community Survey (ACS) data, any other data used by HUD to calculate the **FY 2022** final IHBG formula allocations, and data included in a successful IHBG Census challenge previously approved by HUD before July 26, 2022.

Any other sources of data (e.g., internally developed data) may be submitted as supporting documentation for other NOFO Subfactors but will not count for points towards Subfactor 2.1.b.

**Q10: Regarding Subfactor 2.3. Past Efforts to Address Identified Need, is the response limited to projects that were funded by HUD grants only?**

No. Applicants may describe projects that were funded by HUD grants or other funding sources to address Subfactor 2.3.

**Q11: What is the Period of Performance for this grant?**

The NOFO gives an estimated period of performance project start and end date of July 13, 2023 to July 12, 2028, on page 13. The actual period of performance will vary based on the project.

**Q12: If a Tribe/TDHE applied for funding last year, will it be eligible to receive 5 points under Subfactor 2.5. New and Previously Unfunded Applicants?**

If the applicant, including its corresponding Tribe or TDHE, applied under the FY18/19,20, or NOFOs but was not selected for funding, then the applicant will receive 5 points for the FY 2022 IHBG Competitive grant review.

However, if the FY22 applicant, including its corresponding Tribe or TDHE, received an award under the FY18/19, FY20, or FY21 NOFOs, then it will receive 0 points. Therefore, the maximum



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points an FY18/19, FY20, or FY21 grantee (including its corresponding Tribe or TDHE) may receive if it submits an FY22 application is 95 points (without the addition of Preference Points).

### **Q13: For Subfactor 2.1.b., can the applicant use the IHBG Formula data to support the needs identified in Subfactor 2.1.a?**

Yes. Please submit data used by HUD to calculate FY 2022 final IHBG formula allocations. Please refer to pages 40-41 of the NOFO.

### **[Section V.A.1 Rating Criteria: Rating Factor 3-Soundness of Approach](#)**

### **Q1: What is the scoring methodology for Subfactor 3.1, “IHBG Competitive Priorities?”**

ONAP will award a maximum of 10 points under this Subfactor as follows:

HUD will calculate percentage of funding proposed towards the eligible activity, excluding administration and planning costs.

For Applications with Multiple Activities: HUD will take the percentage of funding from Step #1 and will determine which Subfactor category (3.1a-3.1e) to apply. HUD will use the category that would provide the applicant with the highest points.

For Applications with Acquisition Projects: HUD will use the appropriate Subfactor category (3.1a-3.1e) depending on the nature of the project proposed. For instance, if an applicant is acquiring units to remodel, then HUD will apply the rehab category for this Subfactor. Projects for the acquisition of manufactured housing will be rated under 3.1.a, New Housing Construction, since such housing is constructed before acquisition.

Rounding: HUD will apply standard rounding rules. Therefore, 74.5% would be rounded to 75%, while 74.4% would be rounded to 74%.

For detailed examples, please review the Rating Factor 3 training module posted on Codetalk.

### **Q2: Can you define the difference between administrative costs and indirect costs?**

Administrative costs and Indirect costs are defined in the NOFO, IHBG regulations and 2 CFR part 200. Per the NOFO and IHBG regulations, applicants that are awarded a grant under this NOFO in excess of \$500,000 may use up to 20 percent of the grant award, and in the amount of \$500,000 or less may use up to 30 percent of the grant award, plus program income received for program administration activities described in 24 CFR 1000.238. Both the indirect cost allocation for the applicant and any other administrative expenses would fall under the applicable cap. Whether proposal costs are considered direct costs or indirect costs would depend on the applicant’s indirect cost allocation plan. In the case of grant proposals, it is unlikely that grant writing expenses are included in the indirect cost allocation plan, so that

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leaves it as an administrative cost, per 24 CFR 1000.236. Please ensure you are familiar with your indirect cost allocation plan, so that your application aligns with it and the applicable requirements in the NOFO.

### **Q3: New Housing Construction Projects.**

Applications that propose infrastructure for new housing units, but the funding for the actual new housing is coming from another source, will be counted as new housing construction if the new housing units will be constructed within the proposed Period of Performance.

Applications that propose to use IHBG Competitive grant funds to carry out infrastructure activities that either support existing affordable housing units or will support the development of affordable housing that will be developed in the future (beyond the proposed Period of Performance date) will be rated under Subfactor 3.1.b., Affordable Housing-Related Infrastructure Projects.

### **Q4: Does reconstruction count as new construction?**

Yes. See Subfactor 3.1.a.

### **Q5: For purposes of calculating points under Subfactor 3.1, will HUD consider only the proposed grant amount, or will HUD consider the total project cost?**

In calculating the number of points that an applicant will receive under the various categories of activities in Subfactor 3.1 categories (3.1.a—3.1.e.), the NOFO states that HUD will calculate the percentage of funds “awarded under this NOFO” that will be spent on such activities. Therefore, HUD will only consider the proposed grant amount when calculating points under Subfactor 3.1 and will not base any percentages on the total project costs of a particular project.

For example, if an applicant applies for \$1 million and plans on spending 100% of this amount for the cost of constructing new affordable housing units (Subfactor 3.1.a), and plans on using tribal funds to cover related on-site infrastructure for the planned housing units, HUD will only assess the percentage of the \$1 million that the applicant plans to use on new construction. In this case, under Subfactor 3.1.a, HUD will award the applicant 10 points because it plans on spending 100% of the funds awarded under the NOFO to carry out new housing construction projects.

### **Q6: If multiple projects are proposed, how will Subfactor 3.3 (Implementation and Readiness) be scored if each project is at a different level of readiness?**

Applications will be scored in accordance with the point breakdown at Subfactor 3.3. If the applicant has already completed major steps to facilitate the implementation of each proposed project, even if the projects are at different levels of readiness, they may qualify for full points for that Subfactor.

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**Q7: How will HUD determine costs are reasonable, and necessary for a proposed project? For example, a rehabilitation project that requires compliance with the National Historic Preservation Act may cost more than rehabilitation of non-historically significant homes. Do the HUD Total Development Cost limits account for this?**

Applicants must document and explain the budget for the proposed project in Form HUD-53246 (Cost Summary) and a detailed Budget Narrative. The Budget Narrative must show a breakdown for each budget line, which HUD will review and evaluate whether costs are reasonable and necessary. See NOFO Subfactor 3.4, pgs. 53-54 and the Budget Narrative submission requirement (h) Budget Narrative, p. 23.

**Q8: What Total Development Cost (TDC) amounts apply to this NOFO?**

A recipient must either use the TDC limits published by HUD or adopt written standards for its affordable housing programs that reflect the requirement specified in 24 CFR §1000.156. Notice PIH 2022-16 provides the updated schedule for the maximum amount of funds that may be used for affordable housing, effective June 9, 2022. Notice PIH 2022-16 is available at [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/ih/regs/notices](https://www.hud.gov/program_offices/public_indian_housing/ih/regs/notices).

HUD will evaluate whether the costs are reasonable by using the current TDC Notice as a reference, where applicable. Applicants are reminded that projects must meet all IHBG regulatory requirements, including TDC requirements. HUD will ensure that successful applications meet TDC requirements prior to funding under Section B.3.k - Pre-Award Requirements.

**Q9: Would construction of a new office complex be counted as new housing construction for purposes of Subfactor 3.1 even though it is not itself actual housing?**

No. Subfactor 3.1.a addresses new housing construction. Projects involving the construction of non-residential buildings are not considered new housing construction projects and will be rated under 3.1.e, "Other NAHASDA-eligible activities."

**Q10: How long is the required affordability period under Subfactor 3.2 Project Implementation Plan?**

All applicants must establish a minimum affordability period to ensure units assisted with IHBG Competitive funds will remain available to IHBG-eligible families for the remaining useful life in accordance with Section 205 of NAHASDA. Applicants that propose an affordability period of at least 20 years may qualify for the maximum 10 points. Applicants that propose an affordability period less than 20 years may qualify for a maximum of 7 points if it addresses all the other components.

**Q11: Please define the term "near future" as it is used in the NOFO.**

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The term “near future” is used in both Subfactor 3.1.d (Affordable Housing-Related Infrastructure Projects) and Subfactor 3.2 (Project Implementation Plan), specifically for infrastructure projects. “Near future” will be considered to be soon after the period of performance end date.

**Q12: For purposes of calculating percentage of “funds awarded under this NOFO” in Subfactor 3.1, is the percentage based only on the IHBG competitive funds requested?**

Yes. The percentage of funds used will be calculated only from the IHBG funds requested. It will not include leveraged funds.

**Q13: Can the IHBG competitive funds be used to rehabilitate 1937 Act units still under management?**

Yes. IHBG competitive funds can be used towards any IHBG-eligible activity, including the rehabilitation of units developed under the United States Housing Act of 1937.

**Q14: Should units to be acquired be identified in advance or would a budget and the number of units proposed to be acquired be sufficient?**

Subfactor 3.2-Implementation Plan requires all applicants to identify the rationale of the project design and the location of the project. Additionally, Subfactor 2.1.a.-Identified Needs requires an applicant to identify the total number of units it proposes to acquire while Subfactor 3.4-Budget includes components HUD will use when reviewing the Budget Narrative and Cost Summary.

Therefore, an applicant does not have to identify the specific units it proposes to acquire but should review the NOFO carefully to ensure it is addressing the requirements, including total number of units, location, and budget, to qualify for points under these Subfactors.

**Q15: As most know, the costs of building materials have risen substantially, in part due to the COVID-19 National Emergency. Will HUD take this into consideration when determining the reasonableness of the cost?**

Yes. An applicant may address and explain the increase in costs in the budget narrative. This may also be discussed further in the narrative responses related to the project implementation plan, implementation schedule, etc. Applications will be evaluated on whether the proposed project’s budget is thoroughly prepared and documented. Also, HUD will determine if budget costs are allowable, allocable, reasonable, and necessary for implementing the project.

**Q16: Is the applicant still required to address Section 3 implementation and how it will address conflicts between Section 3 and the Indian Preference requirements?**

No. HUD’s Section 3 Rule has changed, and the IHBG program is no longer subject to Section 3 requirements.

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For Subfactor 3.2., applicants must continue to address how the applicant will comply with Indian Preference requirements as part of its narrative response.

**Q17: If an applicant will need a TDC determination for a project based on Notice PIH-2022-16 because the development includes buildings with more than 4 units, does this determination need to be in hand for the application?**

No, the determination is **not** required at the time of submission. HUD will evaluate whether the costs are reasonable by using the current Total Development Cost (TDC) Notice as a reference, where applicable. Applicants are reminded that projects must meet all IHBG regulatory requirements, including TDC requirements. HUD will ensure that successful applications meet TDC requirements prior to funding under Section B.3.k - Pre-Award Requirements.

**Q18: Is Grant Writer Compensation to prepare the IHBG grant an allowable expense in this grant?**

Yes. Grant writer expenses will be considered pre-award costs, must be identified by the amount in the Cost Summary and as activity in the Budget narrative, and will in most cases be counted towards the planning and administrative cap of the grant request.

**Q19: Explain "no choice limiting actions"**

Choice limiting actions refer to any action that could limit the choices available to resolve an issue identified during the environmental review process. Choice limiting actions include activities such as acquisition, demolition, rehabilitation, repair, new construction, site preparation or clearance, ground disturbance, and leasing. Choice limiting actions may not occur prior to the completion of an environmental review.

**Q20: When budgeting for a new housing construction project, do we reference Notice PIH-2019-19 or Notice PIH-2022-16 for the current Total Development Cost?**

Please reference Notice PIH-2022-16 for current Total Development Costs.

**Q21: If 100 percent of proposed costs are dedicated to New Housing Construction, then the full ten (10) points will be awarded, correct?**

Yes.

**Q22: In the past, the affordability period was based on the TDHE policy. In cases where the required affordability period is lower, would not the policy prevail without reduction in points?**

No. The required affordability period is at least 20 years. If the affordability period proposed in the application is less than 20 years, zero (0) points will be awarded.

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**Q23: Milestones are difficult to show on HUD form 53247 due to lack of space. Can the specific tasks and timelines and milestones be shown in separate document attachment for points?**

Yes. Multiple HUD-53247s can be submitted. Also, applicants can submit separate document attachments to show specific tasks and timelines and milestones. As a reminder, these separate attachments must be submitted with the required HUD-53247 in the grant submission.

**Q24: What information do we include for infrastructure components of a new housing construction project to show they are reasonable if they are not part of the Total Development Costs (TDCs)?**

As stated in the NOFO, HUD will use the current Total Development Cost (TDC) Notice, PIH-2022-16, as a reference for whether costs are reasonable. Notice PIH-2022-16 clarifies that the cost of infrastructure outside the boundaries of a housing site, and off-site costs such as water, sewer, roads, etc., are excluded from TDC limits. As such, the applicant should rely on the cost estimate from a qualified A&E which should be included in the Budget Narrative and Cost Summary to respond to Subfactor 3.4, Budget. Reasonable costs for infrastructure are determined in the procurement review process.

**Q25: How do environmental review requirements apply when an applicant is acquiring or has acquired land prior to award?**

Per HUD environmental review requirements, an environmental review for a project must be completed before funds are released, and before any choice limiting actions are taken. This is addressed at several points in the NOFO, including Subfactor 3.3 (Implementation Schedule and Project Readiness), which notes that projects cannot start before environmental review and release of funds.

However, as stated in the NOFO, applicants are allowed to spend pre-award leveraging on land acquisition. See Rating Factor 4, page 54.

As such, if a successful applicant acquires land prior to award, the acquired land must be included in the environmental review before the funds will be released.

### [Section V.A.1 Rating Criteria: Rating Factor 4-Leveraging Resources](#)

**Q1: Can prior expended funds be used as leverage?**

Generally, no. Funds that have been expended on the project prior to the Period of Performance start date will not be counted as leverage. The only acceptable pre-award costs that can count as leverage are proposal costs incurred to prepare an application for submission under this NOFO and the value of land acquisition used towards leveraging contribution as discussed in Rating Factor 4.

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See NOFO, Funding Restriction #3 “Pre-award costs”, p. 28 , and Rating Factor 4 Leveraging Resources, pages 55-56.

**Q2: Can land that was acquired by the applicant or donated to the applicant in the past be used as leverage?**

Yes. The value of land that was acquired by the applicant or donated to the applicant in the past can be counted as leverage if the applicant proposes to use the land for a funded activity under the NOFO. The land would need to have a current valuation, as discussed in “methods for land valuation” on the pages 56-57 chart in the NOFO.

**Q3: Can land that was improved with site infrastructure prior to application under the NOFO be counted as leverage? Can the applicant include the cost of the site infrastructure in the leverage amount?**

Yes, land that was improved with site infrastructure prior to application can be counted as leverage. The improved land would need to have a current valuation, as discussed on pages 56-57 chart in the NOFO. The cost of the site infrastructure would not be counted as leverage, but rather the assessment of land value would include the value of the improvements, in keeping with the NOFO requirement that prior expended funds cannot be used as leverage. See NOFO, Rating Factor 4 Leveraging Resources, pages 55-57.

**Q4: For purposes of Rating Factor 4 Leveraging Resources, how will the leverage percentage be calculated?**

Under Rating Factor 4, HUD will calculate leverage percentage relative to the total IHBG Competitive Grant Project costs provided on line 18g of Form SF-424 and the grand total on line 7 of Form HUD-53246. We have included an example of the leverage percentage calculation.

Percentage of leverage = (equals)

Total leverage resource amount/ (divided by)

Total project cost (grant amount requested + total leverage resource amount)

Total project cost should match line 18g on Form SF-424, as well as the grand total on line 7 of Form HUD-53246 (sum of columns b, c, and d).

Example: \$1,666,667 / \$6,666,667 (\$1,666,667 + \$5,000,000) = 25%

**Q5: What does “no longer fundable” mean under Rating Factor 4 Leveraging Resources?**

If an applicant does not provide HUD with evidence of a firm commitment from the original leverage source or an alternative source within six months of the date of grant award, or if anticipated leverage is not provided at all, HUD will re-rate and re-rank an application. See NOFO, Rating Factor 4 Leveraging Resources, page 57. If the total points awarded to the applicant after HUD has re-rated and re-ranked the application falls below 75 (without the addition of Preference Points), the combined score from Rating Factor 1 and Rating Factor 2

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points fall below 35, and/or Rating Factor 3 points fall below 20, HUD will not fund the application. Threshold Eligibility Requirements #5, "Rating Factor Thresholds" on p. 16 of the NOFO requires all fundable applications to meet these thresholds in order to be considered for funding. If the total points awarded to the applicant after HUD has re-rated and re-ranked the application do not fall below these thresholds but fall below the scores of other applications that were not awarded funding, HUD may use the de-obligated or recaptured funds in accordance with the "Additional IHBG Competitive Funds" provisions (bullet j) on page 65 of the NOFO.

**Q6: We plan to pay for a portion of indirect costs through tribal funds. Can that be counted as leveraged resources?**

Yes. Contributions that could be considered as leveraged resources for point award include tribal government funds. See NOFO, Rating Factor 4 Leveraging Resources, pages 54-56.

**Q7: What is the expected notice of award date to assess whether the sources of leverage funding will be able to "make funding decisions" 4-6 months post that date?**

HUD estimates that awards will be announced in July 2023.

**Q8: Can we still submit an application that does not have confirmed leverage in place?**

Yes. See NOFO Rating Factor 4, pg. 57. In cases where an applicant cannot receive a firm commitment of nontribal funds by the application deadline, the applicant must include a statement from the contributing entity that describes why the firm commitment cannot be made at the current time. The statement must say that the Tribe/TDHE and proposed project meets the eligibility criteria for receiving the leveraged funds. It must also include a date by which the funding decisions will be made. This date cannot be over six months from the anticipated date of grant approval by HUD.

If an applicant does not provide HUD with evidence of a firm commitment from the original leverage source or an alternative source within six months of the date of grant award, or if anticipated leverage is not provided at all, HUD will re-rate and re-rank an application. If the application is no longer fundable after re-rating and re-ranking the application, HUD will rescind the grant and recapture grant funds. See NOFO, Rating Factor 4 Leveraging Resources, page 57.

**Q9: We have land that was previously leveraged for a grant opportunity that we would like to leverage for this NOFO application. Is that permissible under this NOFO?**

No. Land that has previously been used as leverage towards other ONAP competitions may not be proposed as leveraging for this NOFO. An applicant may use land for leverage if the land was not previously leveraged in an awarded grant. For example, if an applicant applied to ICDBG and used parcel A for leverage in the application but was not awarded a grant, the applicant may use parcel A for leverage as part of their IHBG Competitive Grant application. However, if an applicant was awarded an ICDBG grant and used parcel B for leverage in their grant application,



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the applicant may not use parcel B for leverage again when applying for the IHBG Competitive Grant. See Rating Factor 4 Leveraging Resources Chart, pages 56-57.

### **Q10: If awarded, are applicants allowed to spend leveraged dollars before the approval of the Request for Release of Funds? Also, can the cost for grant writing can be used as a leverage?**

No, applicants are not allowed to spend leveraged dollars before the approval of the Request for Release of funds, with a few exceptions. As stated in Section IV.F.-Funding Restrictions #3- "Pre-award costs" (p. 28), the only allowable pre-award costs are proposal costs (e.g., grant writer) incurred to prepare an application for submission under this NOFO and the value of land acquisition used towards an applicant's leveraging contribution. Therefore, if an applicant is using leveraged funds toward proposal costs, that can be spent. Also, if an applicant is using the value of land towards leveraging, that land value can count towards leveraging even if it was acquired prior to award.

For all other leveraged costs, applicants may not spend leveraged dollars until the completion of the environmental review process and the release of funds is approved. Applicants are reminded that as stated in Funding Restrictions #3- "Pre-award costs" (p. 28), "all costs, including leveraging resources, must be incurred within the period of performance dates established in the IHBG Competitive grant agreement."

### **Q11: What are some examples of in-kind resources?**

In-kind resources are contributions (e.g., property or services) that are non-cash provided by a third party and will benefit the grant project (see 2 CFR 200.1, "Third party in-kind contributions"). Examples of in-kind resources may include tangible items such as computers, software, furniture, equipment, and supplies. Services may include transportation, administrative support, space, mail, and internet. Please go to page 54 of NOFO to view several examples of in-kind service.

### **Q12: If an applicant is leveraging land, does the applicant value the entire land contribution or just the parcels that will be used for the project, as identified in the narrative?**

The value of the land used towards leveraging must be tied directly and allocable to the proposed project(s). Therefore, if the IHBG competitive funds will be used for activities on certain parcels, then the land valuation for leveraging should reflect only those parcels. Likewise, if the IHBG competitive funds will be used for activities on the whole land, then the land valuation for leveraging would be the total value of the land.

### **Q13: The NOFO indicates that current program year IHBG funds may be leveraged. Would that be 2021?**

No. For leveraging resources, an applicant may leverage with program year FY22 IHBG funds. This should not be confused with the criteria in Subfactor 1.3.-IHBG Expenditures, where HUD will exclude the review of FY22 IHBG funds when awarding points under this Subfactor.

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**Q14: If the Tribe is 'donating' tribally owned housing as leverage, do they need an appraisal on the current value of the property to count as leverage?**

No. The NOFO states that for Tribal Resources, a Tribal Resolution or equivalent will be sufficient and must identify the exact value of the donation.

**Q15: If the leverage is land, and an appraisal is included with the application, will the applicant also need to provide a letter of commitment?**

No. The land appraisal is sufficient.

**Q16: If a Tribe/TDHE qualifies for the 3 points because it is in an economically distressed area, can it receive the 3 points and an additional 5 points, if it can leverage 25% or more?**

No. The maximum points an applicant may receive for Rating Factor 4 (Leveraging Resources) is 5 points.

If the Tribe/TDHE is in the bottom 25 percentile of Indian Tribes that have the lowest AIAN per capita income in formula area nationally according to the 2011-2015 ACS data, HUD will automatically award 3 points "if the applicant does not otherwise score points . . . for leveraging funds."

However, if the Tribe/TDHE decides to propose leveraging even if it qualifies for the automatic 3 points, then the applicant will receive a number of points based on leverage percentage calculated and verified by HUD and could possibly qualify for the full 5 points.

**Q17: If an applicant is not located in an economically distressed area, but is applying for a project located in one of the economically distressed areas, would the 3 points still be awarded?**

No, three (3) points may be awarded to applicants that meet the AIAN income requirements defined on page 58 of the NOFO. Points will not be awarded based on the location of the project.

**Q18: Please explain Columns D and E of Tribal Area Per Capita Income (PCI) Rating Factor (RF) 4 Resource excel spreadsheet. What do the numbers "1" and "0" mean?**

The Tribal Area Per Capita Income (PCI) RF 4 Resource excel spreadsheet provides a listing of all Tribes/TDHEs that provides the Per Capital Income (PCI) levels in the IHBG Formula areas and indicates whether the Tribe/TDHE will (automatically) qualify for three (3) points allocated for Rating Factor 4 (Leveraging Resources). Please go the IHBG Competitive Block Grant Program website

[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/ih/grants/ihbg\\_cgp](https://www.hud.gov/program_offices/public_indian_housing/ih/grants/ihbg_cgp) and click on Tribal Area PCI 4 Resource Only

## IHBG COMPETITIVE NOFO

# FREQUENTLY ASKED QUESTIONS

[https://www.hud.gov/sites/dfiles/PIH/documents/Tribal\\_Area\\_PCI-RF4\\_Resource\\_Only.xlsx](https://www.hud.gov/sites/dfiles/PIH/documents/Tribal_Area_PCI-RF4_Resource_Only.xlsx) to view the excel spreadsheet.

Column D represents the PCI level (with a designated threshold of \$11,227) and Column E determines whether applicant will qualify for 3 points. For Column E, "0" means that the Tribe is not eligible for the 3 points under RF4. The designation "1" means that the Tribe is eligible for 3 points.

**Q19: What is the best or recommended way to have a monetary assessment or appraisal on fee land on a reservation? It's not always as simple as it would be off reservation. If a Tribe just purchased the land and is donating some or all of it to the TDHE, can that purchase price be apportioned for that donated parcel based on purchase price?**

If the land is in trust the BIA may be able to offer a valuation to the realty office of the Tribe. This is done usually on an annual basis if the Tribe requests it for insurance purposes. It should be a recent appraisal. If using a comparison based on recent sales of similar properties, should have a licensed realtor prepare it. Applicants should not use an aggregate website such as Zillow since that data may not be accurate.

If it is fee simple land sitting next to trust land the valuation would be similar to that in trust. In some instances, the land values may be submitted with a roads inventory that is sent out with the BIA. That road inventory provides a measure for cost of easements.

An applicant may also get a county assessors tax appraisal at the county clerk's office for land that is fee simple.

The purchased price of the land apportioned for use would be the amount that can be donated as a leverage resource.

**Q20: Are applicants required to submit a statement from HUD approving IHBG funds to be committed for leveraging?**

No. To leverage current IHBG funds, applicants must provide documentation of the most recently approved Indian Housing Plan (IHP) which indicates the dollar amount and commits IHBG resources to the project. If not currently approved in the most recent IHP, applicant must state an amendment to the IHP will be processed if awarded IHBG Competitive funding. To leverage future IHBG funds, applicants must provide documentation which identifies the program year and dollar amount of IHBG funds used. See Rating Factor 4, Leveraging Resources, Federal Resources, pgs. 55-56.

**Q21: Does HUD have a preferred method, formula, and/or example of determining valuation of in-kind resources?**

No. There is no preferred way to determine valuation of in-kind resources. Please make sure to specify the method of valuation of in-kind resources. Also, please consider a fair and reasonable value of the in-kind resource.

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**Q22: If our match is going to be used evenly across all cost categories, can we give a total per cost category, as opposed to breaking each line item down by the percentage we plan to expend from match?**

Yes. Applicants can provide a total cost dollar amount for each cost category.

**Q23: If cost sharing is not required, why are there points awarded for leverage?**

The IHBG Competitive program NOFO prioritizes leveraging to encourage additional funding to be incorporated into the proposed grant projects. Applicants will be awarded points for leveraging if they meet the requirements of Rating Factor 4, including providing firm commitments for leveraging, such as cash or in-kind services.

**Q24: Can you provide a list and/or examples of proposal costs?**

Please view 2 CFR 200.460 for description and examples of proposal costs. Proposal costs are the costs of preparing bids, proposals, or applications on potential Federal and nonfederal awards or projects, including the development of data necessary to support the non-Federal entity's bid or proposal. Proposal costs may include fees for a grant writer, for an example.

**Q25: Can ICDBG-ARP and IHBG-ARP funds be leveraged?**

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

### [Section V.A.2 Other Factors – Preference Points:](#)

**Q1: Should the discussion of Climate Change be included in the Workplan Narrative or as a separate document?**

Climate change can be addressed either in a separate document or within the Workplan Narrative.

**Q2: Will applicants need to provide an "established baseline" for Climate Mitigation? to be installed in the near future. Would roof supports be sufficient to earn preference points? If so, which category?**

No. Roof supports are not sufficient to support the climate change preference points. The NOFO states that applicants must show how their proposed grant activities, not subsequent activities, will increase energy efficiency.

**Q3: Can installation of solar panels to a building count as both leverage and climate change preference points?**

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Yes. Renewable energy infrastructure can be addressed under Climate Mitigation. It can also be counted as leverage if the items are donated and the required documentation is included in the application.

**Q4: If an architect provides statements that designs would meet certain standards, can the design elements be provided by a project architect if the project is only in the grant phase? Is this requirement implying that project design takes place prior to NOFO preparation?**

Yes. Climate Change can be addressed with the project design proposed in the IHBG Competitive grant submission. Also, please view example climate change resources at <https://www.fema.gov/emergency-managers/risk-management/hazard-mitigation-planning>.

**Q5: Energy efficiency and green standards often increase the "first cost" of a project, even though the life cycle cost is lower. How does that work with the Total Development Costs?**

[The published TDC's do not take into consideration the up-front costs of energy efficiency measures and green standards. However, as stated in the NOFO, HUD will use the current Total Development Cost \(TDC\) Notice, PIH-2022-16, as a reference for whether costs are reasonable – not the final word. The applicant should rely on the cost estimate from a qualified A&E which should be included in the Budget Narrative and Cost Summary to respond to Subfactor 3.4, Budget, to demonstrate that the costs, including the energy efficiency and green standard costs, are reasonable. If the project is approved, \[a variance to TDCs can be requested through PIH Notice 2022-16 if needed to account for the up-front costs of energy efficiency measures and green standards.\]\(#\)](#)

### [Section V.B. Review and Selection Process](#)

**Q1: What if the application score for Tribes/TDHEs ends up in a tie? How is a tie breaker determined?**

HUD's tiebreaker process is explained in Section V.B.3.h., pages 64-65 of the FY 2022 NOFO.

**Q2: Can Treasury Emergency Rental Assistance (ERA) funds able to be leveraged with IHBG Competitive funds?**

Yes. Treasury has confirmed that ERA funds can be used for leverage, via a published FAQ. To satisfy the IHBG Competitive NOFO requirement to submit a statement from the federal agency approving the amount of funds to be committed for leveraging, the applicant needs to submit their last submitted ARPA-SLFRF report to demonstrate their spending plan.

### [Section VI.C Reporting](#)

**Q1: Are SF-425s due annually now according to Notice PIH 2022-15?**

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Yes. Per Notice PIH 2022-15, ONAP programs, including IHBG Competitive, will require SF-425s to be submitted annually and not quarterly.

### General IHBG Competitive Questions

#### **Q1: In order to submit an application, do I have to attend an ONAP training?**

Participating in NOFO training is optional and is not a requirement for submitting an application under this competition. The trainings provide an opportunity for interested applicants to learn more about the NOFO requirements.

#### **Q2: What labor standards apply to funds under this program?**

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

#### **Q3: Will there be Implementation Training after award?**

Yes.

#### **Q4: Is training for [Grants.gov](https://www.grants.gov) available?**

Yes. Please see the training resources page on [grants.gov](https://www.grants.gov), available at: <https://www.grants.gov/applicants/applicant-training.html>.

#### **Q5: What Income Limits apply to this NOFO?**

[ONAP Program Guidance 2022-01](#) "Income Limits under the Native American Housing Assistance and Self-Determination Act of 1996 (NAHASDA)," provides the latest published HUD Income Limits applicable to the Indian Housing Block Grant program, effective April 18, 2022. It replaces Program Guidance 2021-01. The estimated median family incomes (MFIs and income limits) for FY2022 can be accessed here:

[https://www.hud.gov/sites/dfiles/PIH/documents/2022-01\\_Income\\_Limits.pdf](https://www.hud.gov/sites/dfiles/PIH/documents/2022-01_Income_Limits.pdf) .

#### **Q6: If an applicant is awarded a grant to carry out a specific project under the NOFO, can another selected applicant fund the same project with grant funds under the NOFO?**

No. Section VI.A., "Adjustments to Funding" (pgs. 66-67) of the IHBG NOFO states: "HUD will fund no portion of an application that: ... (3) Duplicates other funded programs or activities

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from prior year awards or other selected applicants.” This prohibits HUD from funding the same project or activity for two applicants.

**Q7: Will HUD consider any extension deadlines afforded as a result of the COVID-19 National Emergency when reviewing applications?**

Yes. HUD will use the new deadlines that were established as a result of the COVID-19 National Emergency when reviewing Subfactor “1.4-Findings,” and Subfactor “1.5-Timely Reporting” and Subfactor 1.6-Single Audit Submission.” More information on extensions can be found on the ONAP Codetalk website.

**Q8: Where can applicants view the IHBG Competitive NOFO training slide shows?**

The FY 2022 IHBG Competitive training slides and recordings are posted here:  
[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/ih/grants/ihbg\\_cgp](https://www.hud.gov/program_offices/public_indian_housing/ih/grants/ihbg_cgp) .

**Q9: Can an applicant propose an IHBG competitive project that also addresses the impact of COVID-19?**

Yes. Applicants must ensure that the proposed project is for activities that are eligible for IHBG competitive funding.

Applicants must also ensure that the project proposed does not request duplicative funding for activities, programs, or projects already paid for with IHBG-CARES or ICDBG-CARES funds or paid for under any other federal programs. Applicants that receive and use multiple sources of funds to address COVID-19 must ensure that work and funding remain allocable to each grant program’s requirements.