Tribal HUD VASH Expansion
NOFA (FR-6400-N-73) Training
AGENDA

I. Funding Opportunity Description
II. Award Information
III. Eligibility Information
IV. Application and Submission Information
Funding Opportunity-Purpose

- Consolidated Appropriations Act of 2017, Congress provided a total of $7 million for renewal grants to the original grantees. After awarding renewal grants, authorized remaining amounts to expand the Tribal HUD-VASH program.

- Expansion amount: **$3,234,432** for grants to Indian Tribes and Tribally Designated Housing Entities eligible to receive block grants.

- This Notice of Funding Availability (NOFA) FR-6400-N-73 announces the availability of the Tribal HUD VASH Expansion grant.
The Tribal-VASH demonstration program is authorized under Consolidated and Further Continuing Appropriations Act, 2015 (P.L. 113-325, approved December 16, 2014)

Under the program, eligible Indian Tribes and Tribally-Designated Housing Entities (TDHEs) receive grants funds for rental assistance Native American Veterans who are homeless or at risk of homelessness, living on or near a reservation or other Indian areas.

Tribes and TDHEs must partner with the Dept. of Veterans Affairs (VA) to provide case management and supportive services.
Funding Opportunity-Purpose

- **Competition vs. Invitation**
  HUD obtained feedback via the Dear Tribal Leader issued June 3, 2019. Majority of respondents favored competitive methodology for expansion.

- **Coordination with VA**
  HUD coordinated closely with the VA in developing the NOFA. Examples include threshold criteria development and Subfactor 3.4—Coordination with VA.

- **Competition priority**
  Priority given to applicants that leverage other funding sources to increase units available for eligible Veterans under the program
I. Getting Started
Program Definitions

The definitions in the Tribal HUD VASH Consolidation Notice and regulations at 24 CFR 1000.10 apply to this program.

**Firm Commitment:** This term refers to a letter of commitment, memorandum of understanding or agreement to participate from an applicant’s partner specifying that it agrees to perform and/or support an activity specified in the application. The firm commitment must demonstrate that the partner has the financial capacity to deliver the resources or skills necessary to implement the proposed activity, either in cash or through in-kind contributions, if HUD awards Tribal HUD VASH funds. Partners that may provide a firm commitment may be the tribal government, a public agency, foundation, or other private party resource provider.
Authorities

- Consolidated and Further Continuing Appropriations Act, 2015 (P.L. 113-325, approved December 16, 2014)—original demonstration program authorization

- Consolidated Appropriations Act, 2017 (P.L. 115-31, approved May 5, 2017)—expansion authorization
AVAILABLE FUNDS

Estimated Total Funding
$3,234,432

New Applicants
$2,234,432

Existing THV grantees
$1,000,000

Number of Awards

HUD expects to make approximately 25 awards from the funds available under this NOFA.

The number of awards will be based on the number of proposals HUD reviews, approves, and funds.
Additional Award Info

Minimum Number of Units: 15 per award
There is no maximum number of units!

Administrative Fees

New Recipients: $92/month per unit, for a 12-month period
Existing Recipients: $92/month per unit, for a 12-month period minus cumulative FY15 + FY17 unexpended admin fee balance in LOCCS on the application deadline date (4/15/21).
HUD reserves the right to adjust the total amounts that will be awarded to new applicants and existing Tribal HUD-VASH recipients depending on demand and the results of its review of applications.

This is a competitive grant. All applications received through this NOFA and pass application screening and threshold review will be rated.

Funds will be awarded in rank order based on the score received on the application.
The **Period of Performance** and planned draw-downs for any grant awarded under this NOFA must be included on the SF-424 (Blocks 17a-17b) and approved by HUD. Costs must be incurred during the period of performance identified on the grant award.

**PERIOD OF PERFORMANCE**

<table>
<thead>
<tr>
<th>Estimated Project Start Date:</th>
<th>08/01/2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Estimated Project End Date:</td>
<td>*07/31/2024</td>
</tr>
</tbody>
</table>

The period of performance will vary, depending on the nature of the Tribal HUD-VASH program activities proposed by the applicant.
III. Eligibility Information
Indian tribes (as defined under section 4(13) of NAHASDA)

AND

Tribally Designated Housing Entity (TDHE) (as defined under 4(13 and 22) of NAHASDA)

who have ever been allocated formula funding.

▶ An applicant does not have to be a current formula recipient to apply!
Subawards

- An eligible applicant may choose to enter into agreements with other eligible Indian tribes or TDHEs or directly serve eligible Tribal HUD-VASH recipients from the other tribe.

- Case management: Case manager assigned to the applicant must be able to provide case management services to eligible Veterans within the IHBG service area of the subaward tribe.

- References: Section IV, “Allocation of Assistance” of the Consolidation Notice and 2 CFR 200.331
TDHEs: Applications submitted by a TDHE on behalf of an Indian tribe(s) must include a tribal resolution(s) or tribal certification on official letterhead authorizing the TDHE to apply on behalf of the tribe(s). The resolution(s) must be submitted with the application. (See NOFA p. 19 for more info.)

Note: IHP certifications will not be accepted to satisfy the tribal resolution requirement!

An Indian tribe that authorizes a TDHE to apply on its behalf may not also submit its own application for funding. Such application will not be evaluated.
COST SHARING AND MATCHING

Cost sharing or matching is **not required** under this grant, but applicants are **encouraged to leverage** other Federal (including IHBG formula funds) and non-Federal sources. (See Subfactor 3.2 of this NOFA.)

Reminder: Competition priority
Priority given to applicants that leverage other funding sources to increase units available for eligible Veterans under the program!
Applicants who fail to meet any of the following threshold eligibility requirements will be deemed ineligible.

Applications from **ineligible** applicants will not be evaluated.
THRESHOLD REQUIREMENTS

1. Resolution of Civil Rights Matters
2. Timely Submission of Applications
3. Number of Applications
4. Verification of Partnership with local VA
5. Utilization Rate Criteria (existing Tribal HUD VASH grantees only)
6. Threshold Rating Factors
Threshold Requirements

1. Resolution of Civil Rights Matters If there are any outstanding civil rights matters, they must be resolved to HUD's satisfaction prior to grant award, provided that all applicable legal processes have been satisfied.

2. Timely Submission of Applications - Applications submitted after the deadline (11:59:59 pm EST-4/15/21), that do not meet the requirements of the grace period policy will be marked late. Late applications are ineligible and will not be considered for funding.
Threshold Requirements

3. Number of Applications

Each eligible applicant **may only submit one application** under this NOFA.

If an applicant submits more than one application, HUD will only accept the last application submitted by the application deadline.

Also, an Indian tribe that authorizes a TDHE to apply on its behalf may not also submit an application under this NOFA.
Threshold Requirements

4. Verification of Partnership with Local VA Office

The applicant must include an official letter of support from its local VA Medical Center (VAMC) or VA Healthcare System’s Director with its application.

The letter must affirm that the tribe or TDHE has consulted with its local VA facility about its interest in establishing or expanding its own Tribal HUD-VASH program and that the VA commits to providing case management.

*Reference: Sample VAMC Support Letter
5. Utilization Rate Criteria (existing Tribal HUD VASH grantees only)

Applicants that currently administer the Tribal HUD-VASH program must have at least a 70% Tribal HUD-VASH unit utilization rate as of the application submission deadline date indicated in this NOFA.

If an applicant is uncertain about whether they meet this threshold criteria, contact TribalHUDVASH@hud.gov.
Threshold Requirements

6. Rating Factors Thresholds

Applicants must receive:

- Minimum **combined** score of:
  - 20 points for Rating Factor 1 - Capacity of the Applicant.
  - 35 points for Rating Factor 3 - Capacity to Administer the Program.
- Overall score of 75 points

Applicants who do not meet the minimum score for each of these rating factors and an overall score of 75 points will be ineligible to receive a grant under this competition.
Statutory and Regulatory Requirements Affecting Eligibility

- Outstanding Delinquent Federal Debt
- Debarments and/or Suspension
- Pre-Selection Review of Performance
- Sufficiency of Financial Management System
- False Statements
- Mandatory Disclosure
- Prohibition Against Lobbying Activities
- Equal Participation of Faith Based Organizations
Programmatic-Specific Requirements Affecting Eligibility

- General Program Requirements and Exceptions:
  - Tribal HUD-VASH Consolidation Notice (83 FR 23710, May 22, 2018)
  - PIH Notices and ONAP Program Guidances that pertain to Tribal HUD-VASH
  - Indian Housing Block Grant (IHBG) statutory and regulatory requirements applicable to rental assistance apply, as modified by the Consolidation Notice.
Tribal HUD-VASH Consolidation Notice

Exceptions

1. Section IV, “Allocation of Assistance” will not apply, except for the provisions related to the tribe/TDHE's use of a subaward agreement to administer Tribal HUD-VASH award, which remains applicable;

2. Section V, “Application for Tribal HUD-VASH Program” will not apply;
Tribal HUD-VASH Consolidation Notice

Exceptions

3. Section VI, “Tribal HUD-VASH Program requirements, Waivers, and Alternative Requirements: O-Reporting Requirements” will not apply, except HUD Form 50058 reporting, which remains applicable; and

4. Section VI.T, “Reduction and Termination of HUD-VASH Grant Funds, Appeal of HUD Determinations, and Reallocation of Grant Funds” will apply, except that instead of the reallocation process specified in the Consolidation Notice, HUD will follow the process described in Section VII.B.4.b, of this NOFA.
Programmatic-Specific Requirements Affecting Eligibility

- **Use of Formula Current Assisted Stock**
  - Established in ONAP Program Guidance, "IHBG in the Tribal HUD-VASH Program" (No. 2018-01, published February 21, 2018)
  - FCAS units can be used to house eligible Veterans, but these units will not be counted in the IHBG recipient’s FCAS formula count during the period Veterans are housed in these units.

- Compliance with Fair Housing and Civil Rights Laws
Criteria for Beneficiaries

The beneficiaries of funds awarded under the Tribal HUD-VASH program are:

- Native American Veterans that are Homeless or At Risk of Homelessness

- Veterans that meet the Consolidation Notice requirements established in Section VI.B.-“Native American Veteran Eligibility.”
IV. Application and Submission Information
OBTAINING AN APPLICATION PACKAGE

Download Application Instruction and Application Package

- Verify:
  - CFDA Number: 14.899
  - Opportunity Title: Tribal HUD-VASH- Expansion
  - Funding Opportunity Number: FR-6400-N-73

The Application package contains the portable document forms (PDFs) available on grants.gov, such as the SF-424 and the Sample VAMC Support Letter. The Instruction Download contains official copies of the NOFA and forms necessary for a complete application.
OBTAINING AN APPLICATION PACKAGE

- Please download most recent application instructions and application package from Grants.gov.

- Verify the CFDA number and CFDA description

- Application packages contain PDFs such as the SF-424
WAIVER

Waiver requests for paper application

- An applicant demonstrating good cause may request a waiver from the requirement for electronic submission.
- Must be received by HUD at least 7 days prior to application deadline date

Please send the requests via email to: Tribal HUDVASH@hud.gov and Area ONAP Offices or a written request directly to HUD Headquarters ONAP Office
You must verify that boxes 11, 12, and 13 on the SF-424 match the NOFA for which you are applying. If they do not match, you have downloaded the wrong Application Instruction and Application Package.

Additionally, your complete application must include the following narratives and non-form attachments.

Narratives and other attachments to your application must follow the following format guidelines.
Submissions for All Projects: All required forms and information must be submitted by applicants.

Unless otherwise noted as a curable deficiency if information under this section is not submitted with the application or is submitted incorrectly, then the application will be disqualified and not evaluated.
Content and Form of Application Submission

Submitted incorrectly includes documents or forms that are blank, forms for other competitive grant programs, or that have file extensions that are incompatible with Grants.gov.

✓ Reminder: Make sure to check that forms are compatible and have been uploaded properly to Grants.gov prior to submission!

Do not submit third party documents, such as audits, general letters of support, or policies, unless specifically asked to do so. Unsolicited information will not be used when rating the applications.
Content and Form of Application Submission

- Application for Assistance (SF-424) – (Non-Curable)
- Disclosure Update (HUD-2880) – (Curable)
- One-Page Proposal Summary – (Curable)
- Implementation Schedule (Non-Curable)
- Workplan Narrative (Not Curable)
- Detailed Budget – (Not Curable)
Content and Form of Application (cont...)

- Tribal Resolution – (Curable)
- Disclosure of Lobbying Activities – (Curable) – Only for state-recognized tribes
- Code of Conduct – (Curable)
- Indirect Cost Rate – (Curable) – only if applicable
The SF-424 must include all the information listed in the NOFA.

Key Contact (Block 8f): List the contact information of the applicant’s proposed Tribal HUD-VASH program manager. Do not list a non-employee of the applicant, such as a contractor/consultant grant writer.

Catalog of Federal Domestic Assistance Number (Block 11): 14.899
Proposed Project Dates (Blocks 17a-b): The estimated period of performance start and end dates for projects awarded under this NOFA is 8/1/2021-7/31/2024.
- Reminder: The period of performance will vary, depending on the nature of the Tribal HUD-VASH activities proposed.

Line 18a (Federal) must list the amount requested under this Tribal HUD-VASH Expansion NOFA only. Other federal funding should not be listed.

Lines 18b-18f must list any proposed leveraged funds

Authorized Representative (Block 21): Include the applicant’s authorized representative contact information (e.g., Tribal Chief, TDHE Executive Director, etc.). This should not be the same person listed as the Key Contact in Block 8f.
One-Page Proposal Summary (Curable)

- Total number of rental housing units
- Type of units: Tenant-Based and/or Project-Based Rental Assistance
- Key outputs/outcomes (e.g., # of eligible Veterans assisted, increase in affordable housing stock for eligible Veterans, etc.)
- If the applicant is a TDHE applying on behalf of multiple tribes, then the TDHE must identify those tribes in its summary.
- **HUD will not consider any information in the summary when rating applications** and may require successful applicants to update the summary based on the pre-award requirement process outlined in this NOFA.
The applicant must address all three rating factors listed in Section V. of the NOFA: RF1-Capacity of the Applicant, RF2-Need, and RF3-Capacity to Administer the Program

HUD strongly recommends the following formatting requirements. However, applications that do not follow the formatting recommendations will not be penalized:

- Letter-sized paper, 8.5” x 11”, with 1” margins;
- Double-Spaced text in the workplan narrative and single-spaced titles, headings, footnotes, quotations, references, and captions;
- 12-point font; and
- Easily readable font such as Times New Roman, Courier, Courier New, or Arial.
Implementation Schedule (Curable)

- Identify each significant activity and milestone required for completing the planning process
- Include planned start and completion dates for all tasks
- Identify key milestones including:
  1. Timeline for establishing required policies for the THV program (new applicants only)
  2. Coordination and collaboration with the VA
  3. Amending the applicant’s Indian Housing Plan to include the THV program
Implementation Schedule (Curable) (cont.)

- Implementation Schedule **must align** with the plans discussed in the workplan narrative and with the SF424 project dates.
- Format: Applicant may choose to submit this **in the format of its own choosing!** (e.g., Word attachment, Excel spreadsheet, etc.). There is no required form!
- HUD may require successful applicants to update the summary based on the pre-award requirement process outlined in this NOFA.
Components of the Detailed Budget submission:

1. Unit of Assistance Table(s) with a written justification for the rent structure
2. Estimated Administrative Fee Usage
3. Project costs for new unit development (Project-Based Only), if applicable
4. Rental Market Supporting Documentation (Tenant-Based Only), if applicable
5. Firm Commitment Documentation (Project-Based Only), if applicable
Detailed Budget (Non-Curable) (cont.)

- Detailed budget must show a breakdown for the new Tribal HUD-VASH award, including all sources and uses of funding.
- Must match SF-424 (Blocks 18a-g) and submitted separately from the workplan narrative.
- Format: Applicant may choose to submit this in the format of its own choosing! (e.g., Word attachment, Excel spreadsheet, etc.). There is no required form!
- HUD may require successful applicants to update the summary based on the pre-award requirement process outlined in this NOFA.
Detailed Budget-Unit of Assistance Table(s)

Provide a table(s) detailing:

1. The number of units requested by the number of bedrooms and the corresponding rent,

2. Include a written justification for the rent structure (see Consolidation Notice, Section VI.H, Rent).

3. If seeking both Tenant-Based and Project-Based Assistance, provide separate tables.

4. If applicant is choosing to calculate rent based on the local Fair Market Rents, info can be found online:

   https://www.huduser.gov/portal/datasets/fmr.html
## Sample Unit of Assistance Table

<table>
<thead>
<tr>
<th>Rental Assistance Requested by Number of Bedrooms: (insert total number)</th>
<th>Type of Assistance: (insert Tenant-Based or Project-Based Rental Assistance)</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-BR</td>
<td>1-BR</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Estimated Rent for Area by Number of Bedrooms</td>
<td></td>
</tr>
<tr>
<td>0-BR</td>
<td>1-BR</td>
</tr>
</tbody>
</table>
Detailed Budget-Administrative Fee Usage

- Estimate how the applicant will budget the use of administrative fees for the program, based on $92/month per unit for a 12-month period.

- Eligible administration and planning expenses are established in Consolidation Notice, Section VI, “Tribal HUD-VASH Program Requirements, Waivers, and Alternative Requirements: M-Administrative Fee and Reserve Account.”
Eligible administrative fee uses include, but are not limited to:

a. Eligibility determinations
b. Intake and briefings
c. Owner outreach efforts
d. Unit inspections
e. Rent negotiations
f. Annual and interim reexaminations
g. Tenant fraud investigations and hearings
h. Processing subsequent moves
i. Costs associated with making rental assistance payment to owners; and
j. Complying with reporting requirements
Detailed Budget-Project costs for new development

- Submit if applicant is proposing to use leveraged funds to construct, rehabilitate, or acquire new units for Project-Based Rental Assistance
- Provide breakdown of project costs associated with the new unit development
- Must match the leveraging amount proposed on the SF-424 and firm commitment documentation submitted with the application

Reminder: HUD will give priority to applicants that leverage other sources of funding towards new units for eligible Veterans!
Detailed Budget-Rental Market Supporting Documentation

- Submit if applicant is proposing to provide Tenant-Based Rental Assistance

- Submit supporting documentation demonstrating rental unit availability where eligible Veterans may be housed. May include:
  
  a) Agreements or letters of partnerships with local landlords
  
  b) A rental market survey identifying the rental market available for Veterans
  
  c) Other documentation demonstrating to HUD’s satisfaction that housing units will likely be available to house eligible Veterans
Detailed Budget-Firm Commitment Documentation

- Submit if applicant is proposing to provide Project-Based Rental Assistance
- Submit if applicant propose to increase its housing stock for eligible Veterans must:
  - Identify the amount of leveraged funding sources that it used or plans to use; and
  - Provide firm commitment documentation supporting this amount (See Subfactor 3.2. Availability of Housing Stock)
Successful Applicants - Errors

HUD may require **successful** applicants to update errors on the SF-424, One-Page Proposal Summary, the Implementation Schedule, and the Detailed Budget based on the **pre-award requirement process** outlined in this NOFA.
Tribal Resolution (Non-Curable):

New Applicants: If an application is submitted by a TDHE on behalf of a tribe, then a tribal resolution or certification on official letterhead must be submitted authorizing the TDHE to submit the application.

Existing Tribal HUD-VASH Grantees:

a) Provide a statement whether the original tribal resolution for participation in the THV program is in effect and applicable

b) If original tribal resolution is no longer in effect and applicable, then submit a new resolution or tribal certification.
Content and Form of Application (cont...)

- **Disclosure of Lobbying Activities** – *(Curable)* – Only applicable for state-recognized tribes and TDHEs

- **Code of Conduct** – *(Curable)* – Submit a copy of the Code of Conduct with the application if it is not listed on HUD’s website or if the information on the website has changed:

  https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/conductgrants
Indirect Cost Rate (Curable deficiency):

The applicant must submit the following information if it is including indirect costs as part of the budget.

Submit either:

1. Copy of federally negotiated IDC rate agreement:
   a) Application must clearly state the approved rate and distribution base in the Budget Narrative and amount budgeted in the Detailed Budget
   b) Must also include a letter stating the approved rate and distribution base or other documentation from the cognizant agency showing the approved rate;

2. De Minimus: If the applicant has NEVER had an indirect cost rate and wishes to use the de minimus rate, then the application must clearly state the intent to use the de minimis 10 percent of Modified Total Direct Costs (MTDC) in accordance with 2 CFR 200.414(f).
SAMS and DUNS

1. SAM Registration Requirement

2. DUNS Number Requirement

3. Requirement to Register with Grants.gov
Application Deadline Date
Thursday, April 15, 2021
11:59:59 pm EST
“Received by Grants.gov" - applicant received a confirmation of receipt and confirmation number

"Validated by Grants.gov" - application has been accepted and was not rejected with errors

HUD strongly recommends applications be submitted 48 hours before the deadline date

Verify the contents of your submitted application to confirm grants.gov received everything you intended to submit. Tip:

Triple check that everything's been uploaded properly, that files are compatible w/ grants.gov (not corrupt), triple check the application submission requirements, etc.
Paper Submission

If a request for a waiver has been submitted and approved, the date stamp would be based on when the Area ONAP receives the application.

**Remember**, it must be received by the deadline date. It is important that applicants coordinate with their particular Area Office to ensure a timely submission.
Funding Restrictions

1. Eligible Activities
2. Pre-award costs
3. Consultant Cap
4. Indirect Cost Rate
Funding Restrictions

1. Eligible Activities

Tribal HUD-VASH activities funded under this NOFA are limited to the eligible activities laid out in the Tribal HUD-VASH Consolidation Notice (83 FR 23710, May 22, 2018).
2. Pre-Award Costs

- With the exception of proposal costs incurred to prepare an application for submission and the value of land acquisition and/or the value of existing housing stock specifically for the use of eligible Veterans used towards and applicant’s leveraging contribution, all costs, including leveraging resources, must be incurred within the period of performance dates established in the Tribal HUD-VASH Agreement.

- Applicants requesting reimbursement of proposal costs associated with the preparation of the Tribal HUD-VASH application must clearly identify this amount and activity in the narrative.

*PROPOSAL COST = GRANT WRITER*
Funding Restrictions

3. Consultant Cap

Tribal HUD-VASH funds may not be used, directly or indirectly, to pay or provide reimbursement for payment of the salary of a consultant in an employer-employee type of relationship at more than the daily equivalent of the rate paid for the Level IV of the Executive Schedule. For more information on the Executive Schedule, please see the Office of Personnel Management (OPM) website.
4. Indirect Cost Rate

If you have a Federally negotiated indirect cost rate, your application must clearly state the approved rate and distribution base and must include a letter or other documentation from the cognizant agency showing the approved rate.

If you have never received a negotiated indirect cost rate and elect to use the de minimis rate, your application must clearly state you intend to use the de minimis rate of 10% of Modified Total Direct Costs (MTDC).

As described in 2 CFR 200.403, costs must be consistently charged as either indirect or direct costs but may not be double charged or inconsistently charged as both.
Other Submission Requirements

Application Certifications and Assurances

Lead Based Paint Requirements
End of the NOFA Overview