

Instructions on Reprogramming and Utilizing FY 2020 Indian Housing Block Grant funding to Prevent, Prepare for, and Respond to COVID-19 Under the CARES Act.

The alternative requirements (approved waivers) in Notice PIH 2020-05 only apply to FY2020 IHBG formula funds. Other years of IHBG formula funds can be used for COVID-19 purposes, as long as those purposes are also eligible activities under NAHASDA - the alternative requirements do not apply.

A. Procedures If the Grantee Wishes to Use FY 2020 IHBG Funding for COVID-19-related Activities

If the grantee wishes to use all or a portion of its 2020 Indian Housing Block Grant (IHBG) for COVID-19-related activities that are only permissible under the waivers in PIH Notice 2020-05, the grantee must draw such funding only from Budget Line Item (BLI) 1620 labelled "COVID-19."

To do so, the following steps must be completed prior to the grantee making an eLOCCS draw:

- 1) The grantee must contact its Grants Management (GM) or Grants Evaluation (GE) Specialist in its local Area ONAP Office by email and advise the GM or GE Specialist of the following:
 - What CARES Act eligible activity(ies) it intends to carryout utilizing the 2020 funding,
 - The amount of 2020 IHBG funding it needs to carry out the activity, and
 - Request that amount be established in the grantee's LOCCS account under BLI "1620 COVID-19."
- 2) The grantee's GM or GE Specialist will then contact the Office of Grants Management (OGM) Specialist in Denver via email, who will enter into eLOCCS and manually indicate the amount requested by the grantee in the grantee's LOCCS account under BLI 1620 COVID-19, adjust the balance of the grantee's 1602 BLI by the amount BLI 1620 COVID-19, and advise the grantee's GM or GE Specialist via email that the requested funds are in place and ready to be drawn.
- 3) The GM or GE Specialist will then respond to the grantee's initial email and confirm that the amount of 2020 funding requested by the grantee has been made available under BLI 1620 COVID-19 and is ready to be drawn by the grantee for the activity.
- 4) Only after receipt of the conformation email from the grantee's GM or GE Specialist, the grantee may draw the amount requested only from BLI 1620 COVID-19.
- 5) After all these steps are taken, eLOCCS will generate a payment invoice, HUD 50080-IHBG, <https://www.hud.gov/sites/documents/50080IHB.PDF>.
- 6) If the grantee has not already done so, the grantee will also need to amend its FY 2020 IHP as soon as possible to provide the appropriate information.

B. Reporting FY IHBG Funds Already Used for Activities Requiring the Waivers or Alternative Requirements

If, before BLI 1620 COVID-19 and the above procedures are in place, a grantee has already used IHBG funding for activities that require a waiver or alternative requirement under PIH Notice 2020-05, HUD needs to capture that information in LOCCS. Accordingly, grantees that have already used IHBG funding for COVID-19-related activities without utilizing BLI 1620 “COVID-19 must immediately inform its local Area ONAP Office via email of the following:

- 1) The activity for which FY 2020 funding was used;
- 2) The dates the FY 2020 funding was (a) drawn from LOCCS and (b) used; and
- 3) The amount of FY 2020 IHBG funding already used.

If a grantee has informed the area ONAP Office that it has already used FY 2020 IHBG funding for COVID-19-related activities, the area ONAP Office must contact the OGM Specialist in Denver via email and advise her of the information above to assure that the funding was drawn from the FY 2020 IHBG.

If the grantee has not already done so, the grantee will also need to amend its FY 2020 IHP as soon as possible to provide the appropriate information.

C. Use of FY 2020 Invested IHBG Funds

If the grantee is an investment-approved grantee and has already drawn its FY 2020 IHBG funding and placed it in an approved investment account, the investment-approved grantee may use their FY 2020 IHBG invested funds, and only FY 2020 IHBG invested funds, for COVID-19 activities under the waivers and alternative requirements granted in PIH Notice 2020-05. If an investment-approved grantee chooses to use invested FY 2020 IHBG funding for COVID-19-related activities, the grantee must retain documentation detailing:

- 1) the amount it withdraws from its investment account for COVID-19 activities;
- 2) what COVID-19 activities it carries out under the waivers and alternative requirement set forth in PIH Notice 2020-05; and
- 3) the contracts, subgrant agreements, jobs created, invoices, and any other information supporting how and where the funds were expended.

In accordance with PIH Notice-2020-06, the investment-approved grantee must amend its FY 2020 IHP as soon as possible and detail the COVID-19-related activities undertaken with FY 2020 invested funds. Likewise, the grantee must report the use of the FY 2020 IHBG funds for COVID-19-related activities on its Annual Performance Report and on its quarterly Financial Reports (SF-425) in Line 12 or on an attached page.

If grantees have any questions regarding use of IHBG Funding on COVID-19 activities that require a waiver or alternative requirement under PIH Notice 2020-05, they should call their GM or GE Specialist at their local area ONAP Office.