



What's New on Codetalk

March 10, 2025

New Postings to the Section 184 OLG INFO Page

OLG INFO Announcement 2025-01 – Extension of the Automatic 90-day Foreclosure Moratorium for Certain Presidentially Declared Major Disaster Area

[Dear Lender Letter 2025-01](#) extends the foreclosure moratorium period for Section 184 loans in Presidentially Declared Major Disaster Areas (PMDAs) within the States of Florida, Georgia, North Carolina, South Carolina, Tennessee and Virginia due to Hurricanes Helene and Milton until April 11, 2025.

For additional information on Section 184 and Section 184 A loans in a PDMA please see [Public and Indian Housing \(PIH\) Notice 2015-15](#)

OLG INFO Announcement 2025-02 – Extension of the Section 184 Indian Housing Loan Guarantee Program Final Rule Compliance Date

[Dear Lender Letter \(DLL\) 2025-02](#) establishes a transition period between the Section 184 Final Rule effective date (December 31, 2024) and the compliance date (December 31, 2025). The DLL provides guidance for Tribes, Lenders, Servicers and other stakeholders on participating in the Section 184 program during the transition period, including a Questions and Answers supplemental document.

Attachment: [Section 184 Transition Period Q&A Supplemental](#)

OLG INFO Announcement 2025-03 – Updated Maximum Loan Limits for the Section 184 and Section 184A Loan Guarantee Programs for 2025

- [Dear Lender Letter 2025-03](#) updates the maximum loan limits for the Section 184 and Section 184A Loan Guarantee Programs. Additionally, the DLL includes Section 184 loan limits for four recently added counties in Arkansas: Craighead, Crittenden, Greene, and Lonoke counties.
- Attachment: [2025 Section 184](#) and [Section 184A Loan Limits](#)

OLG INFO Announcement 2025-04 – Extension of the Section 184 and Section 184A Loss Mitigation Options

[Dear Lender Letter 2025-04](#) extends the loss mitigation options currently in place for the Section 184 and Section 184A programs, which expired on March 1, 2025. The DLL extends these options to December 31, 2025, to align with the compliance date of the Section 184 Final Rule entitled “Strengthening the Section 184 Indian Housing Loan Guarantee Program.” The extension retains a full suite of loss mitigation options for American Indian, Alaska

Natives, and Native Hawaiian borrowers established under DLL 2023-04 and related technical correction under DLL 2023-09.

Tribal Homelessness Network Series – Webinar on March 12, 2025 at 1:00 p.m. ET

Quarterly Meeting - Panel Discussion- Data Sovereignty and Homelessness Issues Attend this discussion to hear from the Susanville Rancheria on their experience with data sovereignty and the Homeless Management Information System (HMIS) as well as other homelessness issues they have addressed.

March 12, 2025 at 1:00 p.m. ET

[Register here](#)

HUD Announces \$150 Million Investment Toward Affordable Housing in Tribal Communities

The U.S. Department of Housing and Urban Development (HUD) announced \$150 million in funding for new affordable and innovative housing in Tribal communities through the Indian Housing Block Grant (IHBG) Competitive Grant program. This funding will be awarded to thirty-two grantees across 16 states and will result in the construction or acquisition of approximately 412 housing units and the rehabilitation of 123 housing units. A total of 535 units will be assisted to benefit Native families.

“Working with our Tribal partners and investing financial resources for the construction of new, affordable housing is a priority for this Administration,” said HUD Agency Head, The Honorable Adrienne Todman. “This funding is critical to the future of housing across Indian Country, especially for Tribal families who need them most.”

“There continues to be a substantial housing need in Native Communities where Tribes face complex issues and unique challenges to constructing new affordable housing, said Principal Deputy Secretary for Public and Indian Housing Richard Monocchio. “Indian Housing Block Grant funding is an important resource to help Tribes provide housing solutions that best serve their communities. “This additional IHBG Competitive funding provides a rare opportunity to fund strong and viable affordable housing projects in Indian Country.”

The IHBG program is the primary means by which the Federal Government fulfills its trust responsibilities to provide adequate housing to Native Americans and is the single largest source of Indian housing assistance. IHBG Competitive funds play a crucial role in bolstering vibrant American Indian and Alaska Native communities. These funds are designated for various purposes, such as new construction, rehabilitation, and infrastructure to support affordable housing within Indian reservations and similar areas.

View the list of awardees [here](#).

HUD Awards \$225 Million To Preserve and Revitalize Housing

The U.S. Department of Housing and Urban Development (HUD) announced the [award of \\$225 million](#) in competitive grant funding for 17 awardees with proposed projects across 26 states through the Preservation and Reinvestment Initiative for Community Enhancement (PRICE) program. PRICE is an innovative grant program – providing funding to preserve and revitalize manufactured housing and manufactured housing communities (MHCs) across the country, including rural, suburban, urban, tribal, and disaster impacted areas.

“This is an historic investment – as the first federal grant program specifically for residents of manufactured homes,” said **HUD Agency Head, The Honorable Adrienne Todman**. “Manufactured housing provides an affordable path to homeownership for many families. This funding builds upon HUD’s commitment to advancing housing innovation and reduce housing costs.”

More information on the PRICE competition, including a fact sheet with additional information on the winning proposals can be found [here](#).

HUD Publishes Multi-Agency Tribal Public Interest BABA Waiver

HUD’s proposed [Multi-Agency Tribal Public Interest BABA Waiver](#) will be posted to the Federal Register today. Public comments will be received for 15 calendar days, with the comment period closing at 5:00pm EST on December 28, 2024. Please send all public comments to the Department of the Interior, the coordinating agency for this multi-agency waiver, and reference “Indian Tribes” in the subject line of the email: DOI_Grants_BuyAmerica_Waiver@ios.doi.gov.

The proposed waiver would apply as follows.

- **5-Year Exemption for Awards of \$2.5 Million or Less.** For 5 years from the effective date of the final Waiver, awards and subawards to Tribes, TDHEs, or DHHL of \$2.5 million or less would be exempt from BABA requirements so long as (1) the total prime Federal award or subaward does not exceed \$2.5 million and (2) the Federal award or subaward amount does not exceed \$2.5 million for the life of the award.
- **Manufactured Products.** In addition to the 5-year \$2.5 million exemption, for Federal financial assistance obligated to Tribes, TDHEs, and DHHL between the effective date of the final Waiver and September 30, 2026, manufactured products would be exempt from BABA requirements, regardless of the Federal financial assistance amount. For Federal financial assistance issued prior to the effective date of the final waiver, the waiver would apply to funds not yet expended.

HUD Extends the Date by which Tribes, TDHEs, and DHHL will be Required to Adopt the New HOTMA definition of “Annual Income” in the IHBG and NHHBG Programs

- HUD issued [PIH Notice 2024-37](#). The Notice extends the compliance date for HUD’s final rule entitled “Housing Opportunity Through Modernization Act of 2016: Implementation of Sections 102, 103, and 104” for Indian Tribes, Tribally Designated Housing Entities (TDHEs), and the Department of Hawaiian Home Lands (DHHL). Indian Tribes and TDHEs that apply the income requirements in the 24 CFR part 5 definition of “annual income” under the Indian Housing Block Grant (IHBG) program, along with DHHL will not be required to comply with the changes to these parts in the HOTMA final rule until January 1, 2026.
- In the meantime, Indian Tribes, TDHEs, and DHHL are free to adopt the new HOTMA definition if they choose to do so but are not required to. During the transition and implementation period, Tribes, TDHEs, and DHHL may continue to rely on the definition of annual income contained at 24 CFR 5.609 prior to the HOTMA changes, when determining annual income for families.

New Guidance on Applicability of Build America Buy America Act (BABA) Requirements to Housing Projects

Consistent with Implementation Guidance on Application of Buy America Preference in Federal Financial Assistance Programs for Infrastructure (M-24-02), single family housing projects (buildings consisting of 1-4 dwelling units) are considered “private.” Accordingly, BABA requirements will not apply to HUD Federal Financial Assistance used to fund the construction, maintenance, alteration, or repair of such housing, as such projects are not properly classified as public infrastructure projects for purposes of BABA. However, BABA requirements will apply to projects involving the construction, maintenance, alteration, or repair of housing with 5 or more units (multifamily housing projects). ONAP will issue additional guidance and update existing guidance for Tribal Recipients relating to BABA and housing projects soon. For now, ONAP encourages all Tribal Recipients to review PIH Notice 2024-35 closely and hold clarifying questions to ONAP staff. We are working on FAQs and will be updating BABA guidance soon to incorporate this new guidance from OMB.

[OLG INFO 2024-22](#)– ONAP Provides Clarification on Accessory Dwelling Units for the Section 184 Indian Housing Loan Guarantee Program and Section 184A Native Hawaiian Housing Loan Guarantee Program

On October 18, 2024, the Office of Native American Programs (ONAP) issued [Dear Lender Letter 2024-09](#) (DLL) titled “Accessory Dwelling Units”.

PIH Publishes BABA Implementation Guidance for Tribal Recipients

On Friday, October 11th, 2024, PIH published [Notice PIH 2024-35](#): Implementation Guidance for Tribal Recipients on the Build America, Buy America Act (BABA). The Notice will remain in effect until amended, superseded, or rescinded. The Notice provides guidance to Tribes, Tribally Designated Housing Entities (TDHEs), Tribal entities, and the Department of Hawaiian Home Lands (DHHL) (collectively called “Tribal Recipients” in this Notice) on how to implement the “Buy America Preference” (BAP) imposed by BABA. It is intended to outline BABA requirements for all U.S. Department of Housing and Urban Development (HUD) Tribal Recipients when applying the BAP to covered programs and projects. It also clarifies which Office of Native American Programs (ONAP) grants are subject to BABA, how to determine if the BAP is applicable to a project, which HUD general waivers may apply to a project, how to document BAP compliance, and how to submit a specific waiver request for approval. BABA established BAP requirements for certain infrastructure projects funded with Federal awards, and HUD issued a waiver of these requirements for Tribal Recipients that expired after September 30, 2024. This Notice is effective upon publication and applies to any Federal Financial Assistance (FFA) obligated by HUD to Tribal Recipients on or after October 1, 2024. The notice can be found at this link:

https://www.hud.gov/sites/dfiles/PIH/documents/PIH_2024-35.pdf

BABA Public Interest Waiver Expiring

HUD issued a [waiver](#) of the Build America Buy America requirements for **Tribal Recipients** that expires after **September 30, 2024**.

Starting October 1, 2024, any **NEW** obligations made by HUD (grant agreements signed by HUD) will be subject to the Buy America Preference (BAP) requirements for infrastructure projects.

We anticipate that BABA requirements will not begin to impact Tribes and TDHEs until later this year when ONAP anticipates obligating new funding given that we are currently under a Continuing Resolution.

ONAP will provide more specific guidance in a forthcoming implementation notice that is intended to outline BABA requirements for all HUD Tribal Recipients when applying the BAP to covered programs and projects. It will also clarify which how to determine if the BAP is applicable to a project, which HUD general waivers may apply to a project, how to document BAP compliance, and how to submit a specific waiver request for approval.

The most current information can currently be found at HUD's website [Build America, Buy America \(BABA\) | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](https://www.hud.gov/).

General Applicability Waivers from BABA Requirements

HUD has approved several general applicability waivers for specific public interest circumstances:

- Small Grants/Projects: Where a grant or project's total cost is equal to or less than the current Simplified Acquisition Threshold of \$250,000.
- De Minimis Portion of a Project: Where the cumulative total of product purchases is no more than 5 percent of the total cost of the iron, steel, manufactured products, and construction materials, up to a maximum of \$1 million.
- Exigent Circumstances: Where there is an urgent need to immediately complete a project because of "exigent circumstances," or a threat to life, safety, or property of residents and the community.

If your situation falls within any of the categories above, BABA waived. Tribes and TDHES do not have to submit anything to HUD to take advantage of these existing waivers. Tribes and TDHES simply must keep documentation demonstrating that the waiver applies.

ONAP appreciates all Tribal feedback that has been received from Tribal grantees to date on this topic and will be issuing additional guidance shortly. Thank you for your patience. More to come shortly.

Dear Tribal Leader Letter– Tribal Directory Assessment Tool (TDAT) Enhancement Project

HUD will host listening sessions on **November 14th**, and **December 5th, 2024**. The sessions will include an overview of TDAT's recent enhancements and an opportunity for Tribal comments and questions. Through these listening sessions, HUD hopes to advance its understanding of Tribal perspectives on the challenges, benefits, needs, and opportunities for using TDAT. HUD recognizes that Tribal input and continued collaboration throughout the project is vital for its success. Attached is a list of questions for you to consider in advance of these listening sessions. HUD looks forward to hearing your thoughts on TDAT and the ways it can be improved to support your Tribe.

Dear Lender Letter 2024-07– Extension of the COVID-19 Loss Mitigation Options

PIH Notice 2024-28– Total Development Cost (TDC) for Affordable Housing Under the Native American Housing Assistance and Self-Determination Act of 1996 (NAHASDA)

This Notice transmits the updated schedule for the maximum amount of funds that may be used for affordable housing under NAHASDA based on Marshall Valuation Service, Marshall & Swift/Boeckh, LLC (M&S/B) and RSMeans Residential Cost Data (RSMeans) for 2024.

Dear Tribal Leader Letter– Simplified Environmental Review Process

ONAP is excited to share new processes that the U.S. Department of Housing and Urban Development (HUD) developed to simplify and streamline environmental reviews for certain activities funded by the Indian Housing Block Grant, Indian Community Development Block Grant, Title VI Loan Guarantee, Native Hawaiian Housing Block Grant, and Tribal HUD-Veterans Affairs Supportive Housing program.

Dear Tribal Leader Letter– 2026 Census Challenge

The purpose of this **Dear Tribal Leader letter** is to inform Tribes and TDHEs that HUD is extending the deadline for FY 2026 Indian Housing Block Grant (IHBG) Formula Census Challenges from March 30, 2025, to May 29, 2025. Additionally, this letter announces that Tribes and TDHEs are now able to access their FY 2026 IHBG Formula Needs Data online here: <https://ihbgformula.com/2026-needs-data/>.

The regulatory waiver that provides for the Census Challenge deadline extension is linked here:
https://www.hud.gov/sites/dfiles/PIH/documents/2026_Census_Challenge_Regulatory_Deadline.pdf