

FY 2023 IHBG COMPETITIVE NOFO FREQUENTLY ASKED QUESTIONS

Updated: 02/16/2024

For any questions, please contact: IHBGCompetitiveProgram@hud.gov

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 or the median income for the United States, whichever is greater.

Section II. Award Information

Q1: Since grant ceiling amounts are based on the Tribe’s population, what data will be used to determine the 2023 formula data population of a Tribe?

Applicants should review their [2023 IHBG formula data](#). For purposes of the FY23 IHBG Competitive NOFO, HUD will use the AIAN or Tribal enrollment data, whichever is highest. For TDHE applicants, HUD will combine the highest FY 2023 formula data population numbers for each Tribe served by the TDHE to determine the ceiling for the grant award.

HUD understands that this is a new change made in FY23 and is accordingly giving Tribes the benefit of the higher data figure for purposes of setting grant ceilings. HUD is implementing this new requirement in FY23 to ensure that more Tribes and TDHEs with high scoring fundable projects can receive funding before all appropriated funding is fully awarded given how competitive this program has been in prior years. HUD will reassess whether to retain these grant ceilings in future competitions.

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,

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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. In the event that a tribe submits an application when their authorized TDHE has also applied, the tribe's application will not be evaluated.

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

Yes, this NOFO clarifies that eligible applicants may sub-award to other entities. There is nothing in NAHASDA, or 24 CFR part 1000 that prohibits a Tribe from issuing a sub-award 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 sub-award 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" (Section V.A.1, pages 36-37).

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 Section III.A., page 17 of the NOFO. As stated in Q2, a Tribe that authorizes a TDHE to apply on its behalf may not also submit its own application for funding.

[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 Workplan Narrative 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, Section III.D.6, page 20).

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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.3. 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 four rating factors listed in Section V of this NOFO and encompasses the proposed IHBG Competitive project(s). Please do not submit password protected or encrypted files with your submission.

Q4: Are there formatting requirements for the Workplan Narrative?

No. The page limits and font requirements are not included in this NOFO.

Q5: How do we address the civil rights matters on pages 18-19 of the NOFO? Do the assurances address it, or do we need to make a separate statement that we do not have any violations?

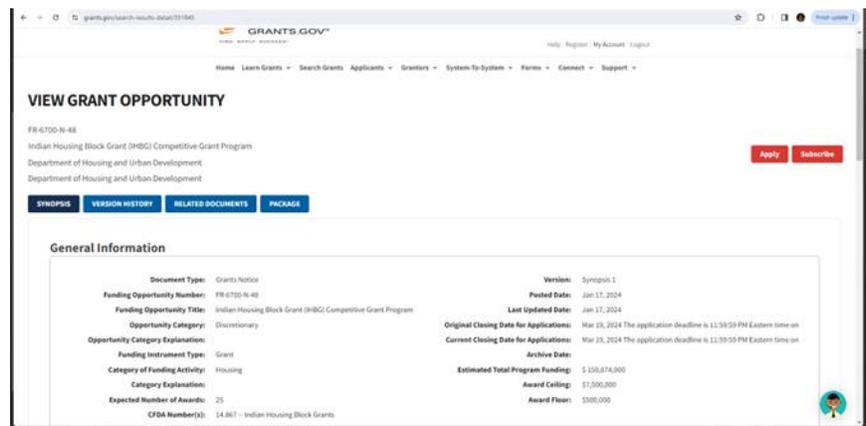
Civil rights matters will be reviewed and evaluated by HUD. No separate statement will be necessary to address civil rights matters.

Section IV. Application and Submission Information

Q1: How can the application package be downloaded from the [grants.gov](https://www.grants.gov) website?

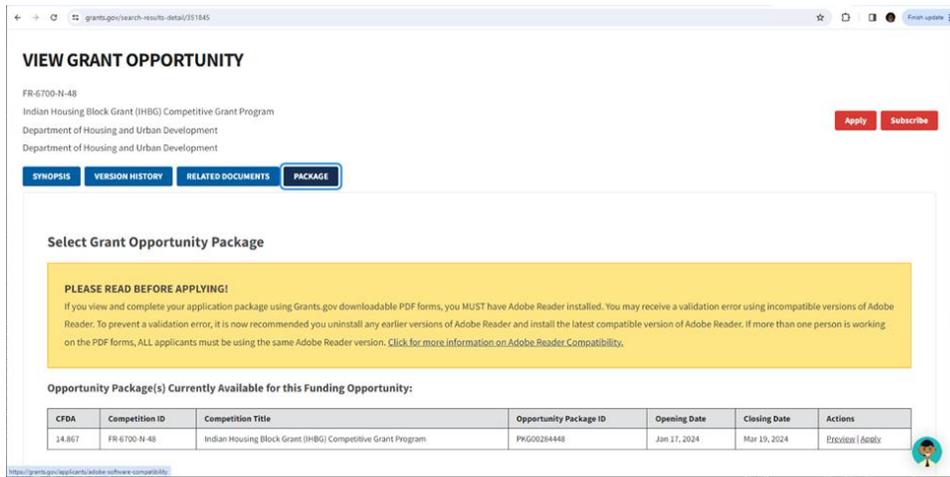
The IHBG Competitive grant opportunity is available here: [grants.gov/search-results-detail/351845](https://www.grants.gov/search-results-detail/351845) Once you have opened the IHBG Competitive grant opportunity page:

1. Click on the “Package” tab.



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



VIEW GRANT OPPORTUNITY

FR-6700-N-48
Indian Housing Block Grant (IHBG) Competitive Grant Program
Department of Housing and Urban Development
Department of Housing and Urban Development

Apply Subscribe

SYNOPSIS VERSION HISTORY RELATED DOCUMENTS PACKAGE

Select Grant Opportunity Package

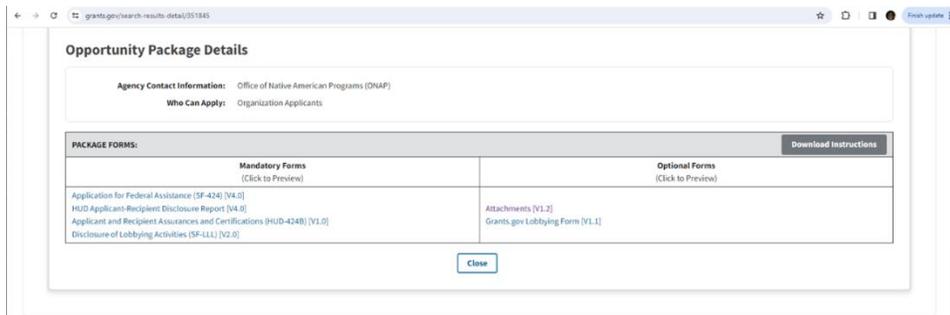
PLEASE READ BEFORE APPLYING!
If you view and complete your application package using Grants.gov downloadable PDF forms, you MUST have Adobe Reader installed. You may receive a validation error using incompatible versions of Adobe Reader. To prevent a validation error, it is now recommended you uninstall any earlier versions of Adobe Reader and install the latest compatible version of Adobe Reader. If more than one person is working on the PDF forms, ALL applicants must be using the same Adobe Reader version. [Click for more information on Adobe Reader Compatibility.](#)

Opportunity Package(s) Currently Available for this Funding Opportunity:

CFDA	Competition ID	Competition Title	Opportunity Package ID	Opening Date	Closing Date	Actions
14.857	FR-6700-N-48	Indian Housing Block Grant (IHBG) Competitive Grant Program	PK600284448	Jan 17, 2024	Mar 19, 2024	Preview Apply

<https://grants.gov/applicants/able-software-compatibility>

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



Opportunity Package Details

Agency Contact Information: Office of Native American Programs (ONAP)
Who Can Apply: Organization Applicants

PACKAGE FORMS: Download Instructions

Mandatory Forms (Click to Preview)	Optional Forms (Click to Preview)
<ul style="list-style-type: none"> Application for Federal Assistance (SF-424) [V4.0] HUD Applicant-Recipient Disclosure Report [V4.0] Applicants and Recipient Assurances and Certifications (HUD-424B) [V1.0] Disclosure of Lobbying Activities (SF-L11) [V2.0] 	<ul style="list-style-type: none"> Attachments [V1.2] Grants.gov Lobbying Form [V1.1]

Close

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. 33.

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

No.

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Q4: Is the “Certification of Compliance” (NOFO Section IV.B.2.i., page 26) 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 curable deficiency.

Q5: 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.

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 #3, “Number of Applications and Eligible Activity Project(s).” (NOFO Section III.D.3., page 19.)

Q6: Is the “Environmental Review – Expression of Intent” (NOFO Section IV.B.2.i., p., page 27) 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.

Q7: 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.

Q8: 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 32. Any requested indirect costs

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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.

Q9: 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?

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

It is up to the 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 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.

Q10: 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. 32). 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 200.1.

Q11: 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.

Q12: Would you prefer that the Workplan Narrative Supporting Attachments be put in one file, then just reference the page number, or should they be submitted as separate attachments with referenced page numbers?

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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.

Q13: Can the Budget Narrative be conveyed in an Excel spreadsheet?

The Budget Narrative is submitted separately from the Workplan Narrative in response to Subfactor 3.4 (Budget). 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.26 and Subfactor 3.4, Section V.A.1, pages 55-56.

Q14: If the applicant is using a contractor/consultant grant writer to help prepare the application, can they 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 (e.g., Tribal Chief, TDHE Executive Director, etc.), not the same person listed in Block 8f.

Q15: 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?

Yes, HUD will accept the ICDBG forms and your application will be reviewed. HUD will send a curable deficiency notification to submit the correct forms. See section IV.B.2.(c & d) page 25 of NOFO for information.

Please note that the correct Implementation Schedule – 53247 will clearly state that it is intended for the IHBG competitive funds as will the Cost Summary – 53246.

Implementation Schedule	
Indian Housing Block Grant	
NOTE: This form is intended for use only by awardees of <u>competitive</u> IHBG funds.	
Cost Summary	U.
	ar
	Of
Indian Housing Block Grant	
NOTE: This form is intended for use only by awardees of <u>competitive</u> IHBG funds.	

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

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Q16: For the “Certification of Compliance,” can all seven components be included in one document or are seven documents required?

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

[Section IV.D.7. 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, pages 30-31). 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 contact 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.F. Funding Restrictions](#)

Q1: Is the cap on administrative and planning costs determined by considering the grant award amount, or the total project cost?

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 and 4., p. 32). All applicants that are awarded a grant under this NOFO may use up to 20 percent of the grant award for IHBG-eligible administrative and planning expenses.

Q2: 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

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preparation of reports. For more information, please see 24 CFR 1000.236-238 and NOFO Section IV.F., Funding Restrictions, p. 32.

Q3: 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?

No. As stated in the “Pre-award costs” of the NOFO (Section IV.F.3., p. 32), “with the exception of proposal costs incurred to prepare an application for submission under this NOFO, all costs must be incurred within the period of performance dates established in the IHBG competitive grant agreement.”

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 who 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. See NOFO Section V.A.1., p.36.

Q2: Subfactor 1.1 of the NOFO states that if there are gaps in capacity for managing and implementing the proposed project, the applicant “must provide a detailed assessment and plan for addressing identified gaps” (page 36). 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.

Q3: 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 1.2 Progress of IHBG Formula Grant and Subfactor 1.5 Findings?

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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 1.2-1.5 based on the performance of the TDHE under the IHBG formula program.

Q4: 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 1.2 Progress of IHBG Formula Grant?

Yes. The NOFO states that applicants approved for and investing IHBG formula funds will be rated under Category 2. See NOFO, Subfactor 1.2, Category 2, Section V.A.1 page 39.

Q5: Should applicants respond to Subfactor 1.2. Progress of IHBG Formula Grant, Category 1, and 1.5. findings in the narrative? Or will HUD rely on its own records only?

For Subfactor 1.2, 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 (2020-2022) 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 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 1.2 Progress of IHBG Formula Grant, Section V.A.1, page 37. For Subfactor 1.5, HUD will rely on its own records.

Q6: 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 one year before the publication date of the NOFO (January 17, 2024). If there are any Single Audit findings in these areas, the application will receive zero points under "Subfactor 1.5. Findings" (see NOFO, Section V.A.1, pages 41-42).

Q7: 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 who will be working directly on the IHBG Competitive grant award and addressing whether there are any potential gaps in capacity.

Q8: If an applicant does not have internal staff capacity but plans to work with a contractor/consultant or subrecipient 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?

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Subfactor 1.1 states that “You must also provide a capacity gap assessment that identifies whether there are any gaps in capacity for managing and implementing the proposed project. This could include key staffing needs for the project or the capacity of current staff to manage and implement the proposed project. If there are identified gaps, you 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.

Q9: 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 1.5 (Findings). Applicants that have had outstanding HUD-ONAP monitoring, HUD-OIG, and GAO findings during the rating period (between January 18, 2023 to January 17, 2024) or have Single Audit findings pertaining to financial management, accounting, and internal controls for HUD-ONAP programs during the rating period, will have points deducted, in accordance with the NOFO.

Q10: How will the applicant determine the amount of undisbursed funds remaining in LOCCS as of the application deadline date?

IHBG formula recipients may contact their Area Office Grants Management Specialist if they have questions regarding undisbursed formula amounts remaining in LOCCS.

Q11: Should an applicant include information in the Workplan Narrative on timely reporting, in response to Subfactor 1.6?

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

Q12: Please clarify the rating periods of the FY 2023 IHBG Competitive grant review for Subfactor 1.5 (Findings), Subfactor 1.6 (Timely Reporting), and Subfactor 1.7 (Single Audit Submission).

The rating periods for Subfactors 1.5, 1.6 and 1.7 are:

- Subfactor 1.5 (Findings) – January 18, 2023 – January 17, 2024 (1 Year prior to NOFO publication date)
- Subfactor 1.6 (Timely Reports) – January 18, 2022 – January 17, 2024 (2 years prior to NOFO publication date)
- Subfactor 1.7 (Single Audit Submissions) – Last 2 audit periods

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Q13: Regarding Subfactor 1.5 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.

Q14: 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.

Q15: Is the NOFO publication date January 17, 2024?

Yes.

Q16: 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?

Yes. As stated in the NOFO at Section V.A.1., pages 36-37, applicants are required to identify key staff, and to address any gap in capacity regarding key staff missing for the project.

Q17: If the applicant is purchasing land, is the real estate agent considered as a key staff person?

No. 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: 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, Section V.A.1, pages 45-46. 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.

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Q2: What is the Period of Performance for this grant?

The NOFO gives an estimated period of performance project start and end date of August 22, 2024 to August 21, 2029. , in Section II.D., page 16. The actual period of performance will vary based on the project but cannot exceed 5 years.

Q3: If a Tribe/TDHE applied for funding last year, will it be eligible to receive 5 points under Subfactor 2.4. New and Previously Unfunded Applicants?

If the applicant, including its corresponding Tribe or TDHE, applied under the FY18/19, 20, 21, and 22 NOFOs but was not selected for funding, then the applicant will receive 5 points for the FY 2023 IHBG Competitive grant review.

If the applicant, including its corresponding Tribe or TDHE, received an award under the FY21 or FY 22 NOFOs, then it will receive 0 points. If the applicant, including its corresponding Tribe or TDHE, received an award under the FY 18/19 or FY20 NOFOs, it will receive 3 points.

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-3.1d) 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-3.1d) 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.

For Applications with Rehabilitation Projects: HUD will score those applications in accordance with 3.1.b. If you are demonstrating income below the low-income 25th percentile threshold level according to Tribal Area Per Capita Income (PCI), HUD will score the application as New Housing Construction under Subfactor 3.1.a.

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.

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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 may use up to 20 percent of the grant award 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 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: When does an application that proposes to carry out infrastructure activities get rated under Subfactor 3.1.a 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.d. - Affordable Housing-Related Infrastructure or Land Acquisition 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.d), 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

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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.

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, Section V.A.1, pgs. 55-56 and the Budget Narrative submission requirement (h) Budget Narrative, Section IV.2.h p. 26.

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 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.2.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.

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Q10: 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 any leveraged funds.

Q11: 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, except model activities, and including the rehabilitation of units developed under the United States Housing Act of 1937.

Q12: 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. 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.

Q13: As most know, the costs of building materials have risen substantially. 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.

Q14: 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.

Q15: 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?

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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.2.k - Pre-Award Requirements.

Q16: 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 and must be identified by the amount in the Cost Summary and as an activity in the Budget narrative and will in most cases be counted towards the planning and administrative cap of the grant request.

Q17: 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. As defined in 24 CFR part 58, 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. See Section I.4.b, page 14 of the NOFO.

Q18: 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.

Q19: If 100 percent of proposed costs are dedicated to New Housing Construction, then the full ten (10) points will be awarded, correct?

Yes.

Q20: 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.

Q21: 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)?

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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.

Q22: 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 (Project Implementation Schedule and Project Readiness), which notes that projects cannot start before the environmental review and release of funds.

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.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 climate change preference points?

Yes. Renewable energy infrastructure can be addressed under Climate Mitigation.

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?

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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.2.h., page 63 of the FY 2023 NOFO.

[Section VI.C Reporting](#)

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

Yes. Per Notice PIH 2022-15, ONAP programs, including IHBG Competitive, will require SF-425s to be submitted annually and not quarterly. The requirement for investment tribes to submit quarterly SF-425s applies to IHBG formula funding and does not apply to IHBG Competitive grants.

[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 training provides an opportunity for interested applicants to learn more about the NOFO requirements.

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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 awards are made?

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: [grants.gov/learn-grants/](https://www.grants.gov/learn-grants/)

Q5: What Income Limits apply to this NOFO?

ONAP Program Guidance 2023-01 “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 July 6, 2023. It replaces Program Guidance 2022-01. The estimated median family incomes (MFIs and income limits) for FY2023 can be accessed here:

https://www.hud.gov/sites/dfiles/PIH/documents/2023-01_FY_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. 65-66) of the IHBG NOFO states: “HUD will fund no portion of an application that: ... (3) Duplicates other funded programs or activities from prior year awards or other selected applicants.” This prohibits HUD from funding the same project or activity for two applicants.

Q7: Where can applicants view the IHBG Competitive NOFO training slide shows?

The FY 2023 IHBG Competitive training slides and recordings are posted here: https://www.hud.gov/program_offices/public_indian_housing/ih/grants/ihbg_cgp .

Q8: 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.

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Applicants must also ensure that the project proposed does not request duplicative funding for activities, programs, or projects already paid for with IHBG-CARES/ARP or ICDBG-CARES/ARP 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.