



Indian Housing Plan (IHP) Annual Performance Report (APR)

August 18-19, 2022
Virtual Training

1

"This material is based upon work supported by funding under an award with the U.S. Department of Housing and Urban Development. The substance and findings of the work are dedicated to the public. Neither the United States Government, nor any of its employees, makes any warranty, express or implied, or assumes any legal liability or responsibility for the accuracy, completeness, or usefulness of any information, apparatus, product, or process disclosed, or represents that its use would not infringe privately-owned rights. Reference herein to any specific commercial product, process, or service by trade name, trademark, manufacturer, or otherwise does not necessarily constitute or imply its endorsement, recommendation, or favoring by the U.S. Government or any agency thereof. Opinions expressed in this document are those of the authors and do not necessarily reflect the official position of, or a position that is endorsed by, HUD or by any HUD program."

2



Presenter

Bill Nibbelink

- Flandreau, SD



Introductions

- Your name and position
- Who do you work for?
- How long have you been involved in your housing program?



Course Objectives

- Gain understanding of the purpose of the IHP/APR
- View IHP & APR process together – Simplify your life!
- Enable you to write an effective and meaningful IHP and an accurate APR.






Key Concepts

Section One

NAHASDA: Guiding Principle

The federal government shall work to provide housing assistance and to assist development of private financing mechanisms, and that federal assistance shall be provided in a manner that recognizes Indian self-determination and self-governance.



Statutory and Regulatory Requirements

- Sections 102-103 and 403-404 of NAHASDA (the statute), & 24 CFR 1000, the implementing regulations
- To receive Indian Housing Block Grant (IHBG) funds:
 - IHP (Form 52737) must be submitted to HUD annually
 - HUD must determine IHP portion to be in compliance with NAHASDA (HUD does not “approve” your IHP)
- For each fiscal year, each recipient shall--
 - (1) review the progress it has made during such fiscal year in carrying out the Indian housing plan (or plans) for the Indian tribes for which it administers grant amounts; and
 - (2) submit a report to the Secretary (in a form acceptable to the Secretary) describing the conclusions of the review.

10

Statutory Sections

- Title I: Block Grants and Grant Requirements
- Title II: Affordable Housing Activities
- Title III: Allocation of Grant Amounts
- Title IV: Compliance Audits and Reports
- Title V: Termination of Assistance
- Title VI: Federal Guarantees for Financing
- Title VII: Other Housing Assistance



11

Regulatory Sections

- Subpart A: General Objectives
- Subpart B: Implementation of Affordable Housing
- Subpart C: IHP
- Subpart D: Formula
- Subpart E: Federal Guarantees
- Subpart F: Monitoring Compliance



12

What are the IHP and APR?

- **Indian Housing Plan (IHP)**
 - Describes housing and housing-related activities for which funds will be expended in the upcoming program year, and the amounts anticipated to be expended for each activity.
- **Annual Performance Report (APR)**
 - Describes the actual amounts expended and the progress made on each of the activities included in the IHP.

13

Easy Quiz 1

- What year was NAHASDA signed into law?
 - 1937
 - 1988
 - 1996
 - 2008
 - None of the above
- What Section of NAHASDA requires the Tribe/TDHE to submit an Indian Housing Plan?
 - 101
 - 102
 - 203
 - I have no idea what these terms even mean

14

IHBG FORMULA

Section Two

15

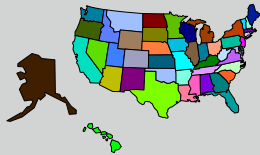
Formula Purpose and Background

- Allocates IHBG funds
- Developed as part of Negotiated Rulemaking
- Intent: Make equitable distribution of annual appropriation
- Allocation is basis of your annual budget



Formula Area

- Geographic area providing substantial housing services
- Formula area and Indian area are different!



Formula Areas Are:

- Reservations
- Trust Lands
- Department of Interior Near-Reservation Service Areas
- Oklahoma Tribal Statistics Areas (OTSA)
- Congressionally Mandated Service Areas
- State Designated American Indian Statistical Areas (SDAISA)
- Tribal Designated Statistical Areas (TDSA)
- California Tribal Jurisdictional Areas per Federal Court Judgment
- Detailed Alaska Provisions

Adding Formula Area

- 1) Request to add other geographies based on Formula Area Definition (List of 9)
- 2) Substantial Housing Services
 - Option 1: Affordable Housing Activities.
 - Funded by Any Source.
 - Provided to AIAN Households =< 80% of Median Income.
 - Valued at least 100% of Increase in IHBG Funding.
 - Option 2: Affordable Housing Activities.
 - Funded by IHBG.
 - Provided to AIAN Households =< 80% of Median Income.
 - Valued at least 51% of Current IHBG Allocation and
 - At least 51% of Enrollment Residing in Area.
 - Or, at least 51% of AIAN in Area is Enrolled by Tribe.
 - Annual Verification Required.

19

Population Cap

- Control to maintain fairness
- Only if AIAN persons > 2x enrollment
- Challenge process available



Formula Response Form

- Sent each year around June 1
- Includes data to be used in formula and the estimated allocation amount for the coming FY
- Provides procedures and forms for Corrections and Challenges
- Final Allocations: Completed after the budget is appropriated
- Your Formula Response Form is available at ihbgformula.com/fy2023

FY 2022 Formula Response Form
Indian Housing Block Grant Formula Data

U.S. Department of Housing
and Urban Development
Office of Native American Programs

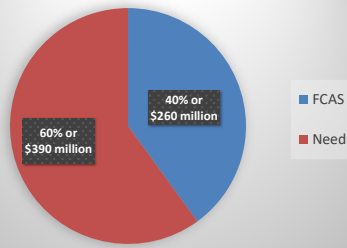
OMB Approval No. 2577-0218
(exp. 11/30/2022)

Four Formula Components

1. Formula Current Assisted Stock (FCAS)
2. Need
3. 1996 Minimum
4. Undisbursed IHBG Funds Factor (UDFF)



IHBG = \$650 million (example)



23

Component 1: Formula Current Assisted Stock (FCAS)

- FCAS is Housing developed under the 1937 Act (before NAHASDA)
- Must continue to be administered and maintained under NAHASDA
- Units included in inventory (FCAS) until conveyed or otherwise no longer in program
- NAHASDA funds are provided for this purpose



FCAS

- Two elements of FCAS in formula
 - Operating subsidy
 - Modernization allocation
- FCAS adjusted by
 - FY96 national averages for Operating subsidy and Modernization allocation
 - Local costs and inflation adjustments

FCAS Change Highlights

(PIH 2017-15)

- Removed reducing Section 8 units based on FCAS reductions
- Codified conversions policies & required reporting on formula response form (FRF)
- Clarified homeownership unit FCAS eligibility after becoming eligible for conveyance
- Clarified demolished & rebuilt unit eligibility

26

Demolished Units : 1000.318(e)

- A unit that is demolished pursuant to a planned demolition may be considered eligible as a FCAS unit if the unit is rebuilt within one year.
- If the unit cannot be rebuilt within one year because of relative administrative capacities and other challenges faced by the recipient, a one-time, one-year extension may be requested.
- Requests must be submitted in writing and include a justification for the request.

27

Units Not Eligible as FCAS

- Units built over the number specified in the original ACC for Projects with DOFA after October 1, 1997.
- Units not used as low-income housing dwelling units include:
 - Units used for non-dwelling purposes
 - Vacant units, unless being made available for occupancy
 - Units being used for VASH program
- Conveyance eligible, conveyed, or demolished units not rebuilt within one year.
- Units constructed with NAHASDA funds

Reviewing FCAS Data

- Review the Formula Response Form.
- Report any corrections to unit counts, unit types, and actual/expected DOFA.
- Submitted corrections will be reviewed and HUD will inform the tribe of the corrected unit counts.

Component 2: Need

- Seven Weighted variables
- Based on Decennial Census and American Community Survey (ACS) 5-year data
- Adjusted for local development costs



Need Component Weights - Need Factors	Weight
Housing Cost - AIAN Households with housing cost burden greater than 50 percent of formula annual income	22%
AIAN Households which are overcrowded or without kitchen or plumbing	25%
Housing Shortage - AIAN households with an annual income less than or equal to 80 percent of formula median income reduced by the combination of CAS and NAHASDA units	15%
AIAN households with income less than or equal to 30% of median income	13%
AIAN households with income 30% - 50% of median income	7%
AIAN households with income 50% - 80% of median income	7%
Total AIAN persons	11%

31

Component 3: 1996 Hold Harmless

- A tribe's IHBG funding is never reduced below its FY 1996 funding level.
- This is the amount the tribe's IHA received in FY 1996 for operating and modernization subsidy.
- IHBG funding is adjusted to the amount received in FY 1996.
- This is a statutory requirement.

32

Component 4: Undisbursed IHBG Funds Factor

- New formula factor
- Provides adjustments for tribes with
 - Initial allocation of \$5 million or more
 - Have undisbursed IHBG funds greater than the sum of their prior 3 years' initial allocation
- Initial allocation will be reduced and any amounts recovered will be redistributed

33

IHBG Formula and the IHP



- NO relationship between formula components used to determine allocation and activities you propose in your IHP
- For example, if you are allocated \$250,000 based on FCAS, you do not have to budget \$250,000 to operate and maintain your FCAS – you can budget more or less than the allocated amount.

34

IHBG Formula Customer Service Center

- Calculates formula allocations
- Provides TA to recipients on formula
- Receives and process corrections and challenges
- 1-800-410-8808
- IHBGformula@firstpic.org



Easy Quiz 2

- The NAHASDA funds Tribes/TDHEs receives are:
 - Loans
 - Grants
 - Subsidies
 - Gifts
 - All of the above.
- Tribes/TDHEs competes with other Federally recognized tribes for funding under NAHASDA.
 - True
 - False
 - It depends upon what HUD office you're under.
 - None of the above.
 - I'm not sure.

36

ALLOWABLE ACTIVITIES

Section Three

37

Eligible Activities

- Eligible activities are:
Affordable housing activities that develop or support housing for rental or homeownership, or provide housing services for affordable housing.
- If using IHBG funds, services and activities cannot be provided unless they are **affordable housing activities**.
- If using Program Income, eligible activities expanded to include **housing-related activities**.

38

Affordable Housing Activities

- Affordable housing is housing that meets the requirements of NAHASDA:
 - Housing units developed under the 1937 Act Housing (Low Rent or LR, Mutual Help or MH & Turnkey, Section 8)
 - NAHASDA Units
 - Other units that meet requirements of Title II (LIHTC, RD, HOME etc.)
- All NAHASDA requirements apply

39

Housing Related Activities

- *Housing related activities, for purposes of program income*, means any facility, community building, infrastructure, business, program, or activity, including any community development or economic development activity, that:
 - Is determined by the recipient to be beneficial to the provision of housing in an Indian area; and

40

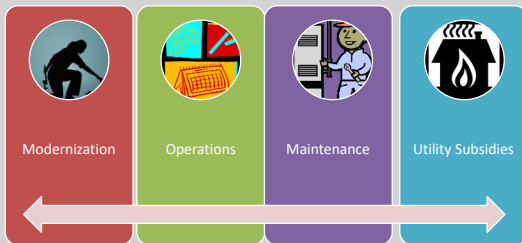
Housing Related Activities *cont.*

- Would meet at least one of the following conditions:
 - Would help an Indian tribe or its tribally designated housing entity to reduce the cost of construction of Indian housing;
 - Would make housing more affordable, energy efficient, accessible, or practicable in an Indian area;
 - Would otherwise advance the purposes of NAHASDA.
- NAHASDA requirements do not apply if not mixed with IHBG funds

41

Indian Housing Assistance

(Primarily for 1937 act housing)



42

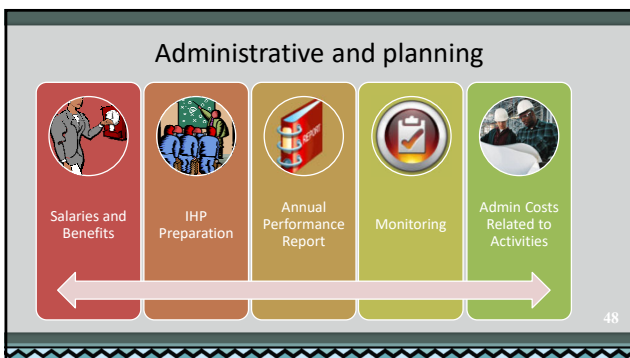












Easy Quiz 3

- Providing safety and protection services to the residents in the Tribes/TDHEs managed units is what type of NAHASDA eligible activity?
 - Housing Services
 - Planning & Administration
 - Development
 - Crime Prevention & Safety
 - All of the above
- Constructing new rental units is what type of NAHASDA eligible activity?
 - Development
 - Housing Management Services
 - Model Activity
 - Indian Housing Assistance
 - None of the above

49

Administrative & Planning Costs

- What are admin/planning costs?
 - Administrative management associated with
 - Using non-IHBG funds for affordable housing
 - Carrying out comprehensive & community development planning activities
 - Coordination and monitoring
 - IHP/APR preparation
 - Formula challenge
 - Overall program and/or administrative management
- Regulatory requirements are described at 24 CFR 1000.236 & .238
- More specific guidance is included in PIH Notice 2014-15

Administrative & Planning Costs Directly Related to Affordable Housing Activities

- May be expensed as administration and planning cost, or
- May be expensed as a cost for developing or operating the affordable housing activities:
 - Whole salary or pro-rated
 - Example – Development Director salary
- Establish cost allocation plan



Maximum A&P Costs

- Maximum percentage of A&P costs determined as follows:
 - 20% of annual grant allocation receiving >\$500,000
 - 30% of annual grant allocation receiving \$500,000 or less
- Maximum A&P costs spent is based on either the percentage of annual expenditures or the grant allocation, whichever is greater.
- HUD may approve higher percentage.

52

Calculating the Maximum A&P for the IHP Budget

Example Grant Amount (a)	Maximum Percentage Allowed (b)	Maximum A&P Based on Grant Amount (a x b)	Example Estimated Expenditures (c)	Max A&P Based on Expenditures (b) x (c)
\$600,000	20%	\$120,000	\$450,000	\$90,000
\$300,000	30%	\$90,000	\$350,000	\$105,000

53

Maximum A&P to report on the APR

Note: if the cap is based on the estimated IHBG expenditures, and the actual IHBG expenditures are less than estimated in the IHP, the A&P expenditures cannot exceed the percentage used (20% or 30%) times the actual expenditures (or the IHP amount, whichever is greater)!

54

Planning & Admin Cap

What's a good explanation for exceeding cap?

- Feasibility study for new project development
- Update needs assessment
- Update accounting software to integrate tenant accounts receivables, work order, inventory with general ledger, payables, etc.
- Approval to exceed the A&P cap MUST be requested before the grantee's FYE-no retroactive approval to exceed.

55

Easy Quiz 4

- An example of an eligible administrative & planning expense is:
 - Cost of overall program and/or administrative management.
 - Coordination of monitoring & evaluation.
 - Preparation of the IHP & APR including data collection.
 - All of the above.
 - None of the above.
- What percentage of IHBG funds can be used for administrative and planning expenses?
 - 30%
 - 20%
 - HUD decides.
 - BIA decides.
 - Could be A or B depending on the amount of the IHBG

56

DEVELOPING THE IHP

Section Four

57

12-Month Approach

- 12-month program year approach adopted for IHP and APR
- Ties planning & reporting to recipient PY not federal grant cycle
- Gets rid of "source year" concept for funds
- Changes LOCCS use of money – oldest funds automatically used first
- No grant close out - rolling, continuous program approach



58

IHP 12-Month Implications

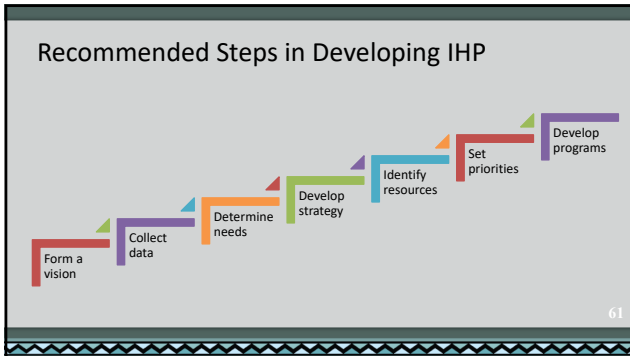
- Relates due dates to recipient program year (IHP due 75 days prior to each grantee's program year start)
- Focuses on planning for all IHBG funds on-hand & amounts to be spent in next 12 months
- Program descriptions tied to IHBG activities undertaken in recipients program year
- What housing activities are planned for the next 12 months, regardless of funding source?

59

APR 12-Month Implications

- Relates due date to recipient program year (90 days after year end for APR)
- Reporting based on activities in 12-month period regardless of source year of funding
- Better tracks to recipients internal budgeting processes
- Better tied to IHP
- What housing activities have been done in the past 12 months, regardless of funding source?

60



Form a Vision

- The Mission of the West River Tribe is to eliminate substandard housing conditions through developing local capacities to provide safe, decent and affordable housing opportunities.

62

Collect Data

- Surveys
- Census
- Meetings

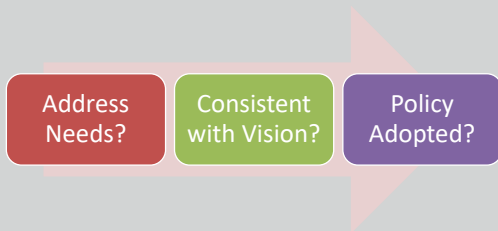
63

Set Priorities



67

Develop Programs



68

Recurring Activities and Projects

- Recurring Activities are ongoing and are in every IHP
 - Maintenance
 - Administration
- Projects have specific start and end dates, and are dependent upon annual funding decisions
 - Development
 - Rental assistance



69

Easy Quiz 5

- How often does the Tribe/TDHE have to submit an Indian Housing Plan to HUD?
 - Quarterly
 - Call HUD and ask
 - Annually
 - Every 5 years
 - Whenever the CEO thinks it's necessary
 - None of the above
- The acronym IHBG stands for Indian Housing Block Grant?
 - True
 - False
 - Don't know
 - None of the above, it stands for Indigenous Homes By Government

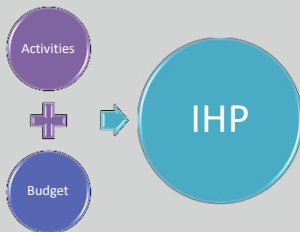
70

THE INDIAN HOUSING PLAN

Section Five

71

What is an IHP?



72

What is an IHP?

An IHP is the Recipient's roadmap that:

- Identifies current housing needs.
- Anticipates potential future housing needs.
- Reflects the changing needs of the tribal community.
- Identifies available resources.



73

Submitting the IHP/APR: Who?

- The IHBG Recipient submits the IHP/APR
 - Tribe or
 - Tribally Designated Housing Entity (TDHE)
- If a TDHE has been designated by more than one tribe:
 - TDHE may submit a separate IHP for each, or
 - Single IHP for all tribes in its jurisdiction
- Be sure to include Tribal Certification

74

Submitting the IHP: How?

- An IHP may be submitted to an Area ONAP in one of two ways:
 1. The EPIC (Energy and Performance Information Center) system MUST be used, unless ...
 2. Internet access is insufficient and a waiver has been approved by HUD in which case a PDF fillable form can be used

75

Submitting the IHP/APR: When?

- Submit IHP 75 days prior to start of program year (PY)
 - Effective management tool
 - Allows recipients to have their IHPs in place at start of PY
 - Failure to submit on time may result in NO IHBG!
- What if no Congressional Appropriation?:
 - If the PY estimate is available, base IHP on PY estimate amount on Formula Response Form; otherwise, use actual grant amount from previous PY IHP
 - Revise IHP (internal only) when actual amount known
 - Update APR to include actual amount (required)

76

IHP Deadlines and Waivers

- Extension may be granted under exceptional circumstances
- HUD cannot waive a due date outside of the statutory limit provided in Section 101(b)(2) of NAHASDA
- Request waiver of the deadline -
 - any time before or after the IHP submission deadline, however ...
 - extension may only be granted for up to 90 days after the original deadline.

77

Energy and Performance Information Center (EPIC)

- What is EPIC? A HUD-based system originally designed to collect information on how PHA's were expending Capital Project grants.
- The EPIC system has been expanded to include reporting on the Indian Housing Block Grant (IHBG) program.



78

EPIC: Latest Information

- Beginning May 1, 2018, recipients are required to submit their Fiscal Year (FY) 2019 IHPs (and APRs) using the online EPIC system.
- Recipients who lack reliable Internet access can use the Adobe fillable PDF version of the form after obtaining a waiver from the Area ONAP Administrator.
- Like eLOCCS, EPIC requires users have an active Secure Systems (aka "M") ID. Each EPIC user will need to obtain their own "M" ID in order to request access to EPIC.

79

IHP/APR Form Program Guidance 2018-02(a)

- Step-by-step guidance for completing the IHP and APR. The guidance provides in-depth descriptions along with numerous examples to assist the recipient.
- Attachment: <https://www.hud.gov/sites/dfiles/PIH/documents/IHPAPRGuidanceFinal.pdf>
- Help information also provided throughout the EPIC form.



80

Key Sections of the IHP

- Cover page (Section 1)
- Housing Needs (Section 2)
- Program Descriptions (Section 3)
- Maintaining 1937 Act Units (Section 4)
- Budget (Section 5)
- Other Submission Items (Section 6)
- Certifications (Sections 7-9)

81

Preparing Program Descriptions

**DO NOT COMBINE
HOMEOWNERSHIP AND RENTAL
UNITS UNDER ONE
CONSTRUCTION PROGRAM,
ACQUISITION, OR REHAB.**

88

Section 3 (Program Descriptions).

Please enter search criteria. A candidate search is performed including all parameters provided.

Program Name:
Unique Identifier:
Eligible Activity:

Unique Identifier	Program Name	Eligible Activity	Planned Funding	Actual Funding	Options
<input type="button" value="Add New Program"/>					

89

Difference Programs, Eligible Activities, Outcomes, Outputs

- **Programs:** What recipient-specific programs will be funded?
- **Eligible Activities:**
 - Pick list tied to NAHASDA-eligible activities
- **Outcomes:** What is the intended result?
 - Pick list tied to ONAP goals
- **Outputs:** How many units or households are planned?

90

Programs, Eligible Activities, Outcomes, Outputs: Example

- **Program:** Recipient will provide purchase assistance for first-time homebuyers who wish to buy in the four-county area.
- **Eligibility Activity:** Down payment/closing costs
- **Outcome:** Assist renters to become homeowners
- **Who Will be Assisted:** Low-income families
- **Level and Type of Assistance:** \$5,000 Cap, Grant
- **Planned Outputs:** four units

91

Guidance on Outputs

Eligible Activity	Output Measure	Eligible Activity	Output Measure
(1) Modernization of 1987 Act Housing [20221]	Units	(13) Down Payment/Closing Cost Assistance [20222]	Units
(2) Operation of 1987 Act Housing [20221]	Units	(14) Lending Subsidies for Homebuyers (Bare) [20223]	Units
(3) Acquisition of Rental Housing [20222]	Units	(15) Other Homebuyer Assistance Activities [20224]	Units
(4) Construction of Rental Housing [20222]	Units	(16) Rehabilitation Assistance to Existing Homeowners [20225]	Units
(5) Rehabilitation of Rental Housing [20222]	Units	(17) Tenant Based Rental Assistance [20226]	Households
(6) Acquisition of Land for Rental Housing [20222]	Units	(18) Other Housing Services [20229]	Households
(7) Development of Emergency Shelters [20223]	Households	(19) Housing Management Services [20245]	Households
(8) Conversion of Other Structures to Affordable Housing [20223]	Units	(20) Operation and Maintenance of NAHASDA-Assisted Units [20246]	Units
(9) Other Rental Housing Development [20223]	Units	(21) Crime Prevention and Safety [20255]	Dollars
(10) Acquisition of Land for Homebuyer Unit Development [20222]	Units	(22) Model Activities [20296]	Dollars
(11) New Construction of Homebuyer Units [20222]	Units	(23) Self-Determination Program [231-235]	Units/ Dollars
Acquisition of Homebuyer Units [20222]	Units	(24) Infrastructure to Support Housing [20222]	Dollars
		(25) Reserve Accounts [20236]	N/A

92

Section 3 (Program Descriptions). Continued...

Unique Identifier	Program Name	Eligible Activity	Planned Funding	Actual Funding	Options
2022.1	Continue to operate and maintain our current assisted stock	(2) Operation of 1987 Act Housing [20211]	\$1,092,151.00	\$0.00	View
2022.2	Provide Crime Prevention and Safety Activities	(21) Crime Prevention and Safety [20255]	\$75,000.00	\$0.00	View
2022.3	Tenant Based Rental Assistance	(17) Tenant Based Rental Assistance [20226]	\$22,500.00	\$0.00	View
2022.4	Provide Housing Services to Program Participants	(16) Other Housing Service [20223]	\$65,000.00	\$0.00	View
2022.5	Modernization of 1987 Act Housing	(1) Modernization of 1987 Act Housing [20211]	\$667,000.00	\$0.00	View
2022.6	Construct small 1 bedroom homes	(4) Construction of Rental Housing [20222]	\$220,000.00	\$0.00	View
2022.7	Infrastructure for New Affordable Housing	(24) Infrastructure to Support Housing [20222]	\$1,275,040.00	\$0.00	View

[Previous Section](#)

[Next Section](#)

Section 5(a): Sources of Funds

- **Purpose:** Describe recipient's funding sources to be used for housing purposes during coming Program Year
- **Statutory/Regulatory Sections:** §102(c)(3)(A), §102(c)(3)(B)
- **Key Contents:**
 - Funds on hand at beginning of year
 - Funds expected to be received during year
 - Anticipated expenditures for each funding source
 - Anticipated unexpended funds for each source at end of year
 - **Must include anticipated receipt and use of Program Income.**

97

Section 5(a) (Sources of Funding for IHPs). Columns A and B are entered by the Recipient. Column C is calculated. Column D is derived from the Program Descriptions Section of the IHP. Column E is calculated. If there are errors identified, click on calculate totals then Save and Continue.

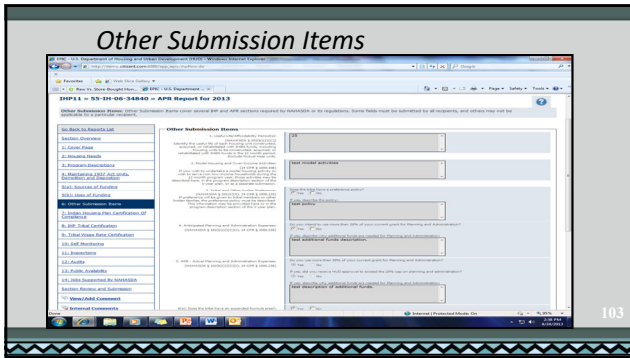
Funding Source	Amount on hand at beginning of program year (A)	Amount to be received during 12-month program year (B)	Total amount of funds (C=A+B)	Funds to be expended during 12-month program year (D)	Unexpended funds remaining at end of program year (E=C-D)
1. IHPG Funds					
1. IHPG Funds	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
2. IHPG Program Income					
2. IHPG Program Income	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
3. Title VI					
3. Title VI	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
4. Title VI Program Income					
4. Title VI Program Income	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
5. Other Operating Sources					
5. Other Operating Sources	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
C. Carry Over IHPG and Funds					
C. Carry Over IHPG and Funds	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
LETTS/MSH Funds					
7. IHPG Funds					
7. IHPG Funds	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
8. Other Federal Funds					
8. Other Federal Funds	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
9. IHPG					
9. IHPG	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
10. Other Federal Funds					
10. Other Federal Funds	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Total	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

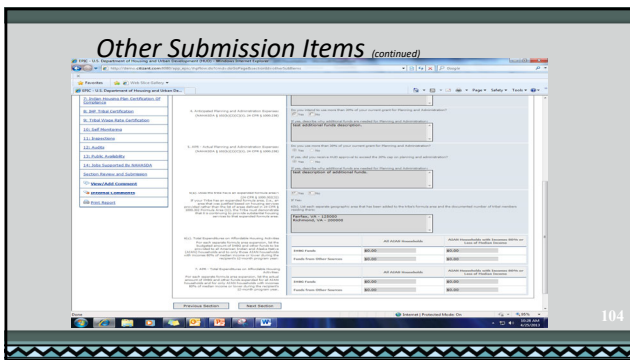
98

Section 5(b): Uses of Funds

- **Purpose:** Describe recipient's programs on which funds will be used during the coming year
- **Statutory/Regulatory Sections:** §102(c)(3)(A), §102(c)(3)(B)
- **Key Contents:**
 - Prior and current year IHPG funds anticipated to be expended on each program
 - Prior and current year Other funds anticipated to be expended on each program

99





Sections 7 – 9: Certifications

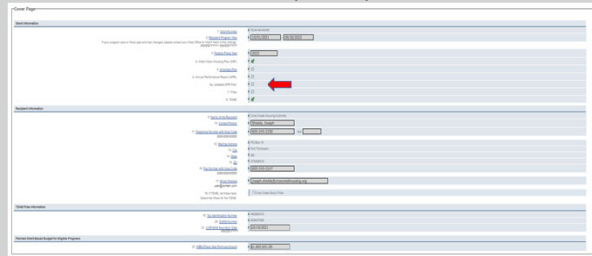
- **Purpose:** Provide various required certifications
- **Statutory/Regulatory Sections:** § 1000.20, 102(c)(5), 102(d), 104(b)
- **Key Contents:**
 - Compliance
 - Tribal certification
 - Tribal wage rates
 - Self-monitoring

Amendments

- **Purpose:** Readily identify changes to IHP
- **Statutory/Regulatory Sections:** § 1000.232
- **Key Contents:**
 - Same as IHP
 - Limit entries to line items that have been added and/or revised

109

Amendments (cont.)



IHP Revisions



Only Required for the following reasons:

1. Adding a new Activity
2. Reducing the amount budgeted for Operation and Maintenance of FCAS housing units

111

Timeframes for ONAP IHP Review

- 60 days for original submission
- 30 days for amendments



112

Critical IHP Review Points

- ✓ Completeness – Are all required elements included?
- ✓ Eligibility – Are all activities eligible affordable housing activities under the Statute?
- ✓ Consistency – Are all Key Sections of the IHP internally consistent in a meaningful way?

113

Critical Consistency Review Points

- ✓ Each planned program year activity must be budgeted (uses of funding).
- ✓ Need must be identified for all planned activities.
- ✓ Requirements and Assistance must be described in affordable housing resources for all activities planned.
- ✓ All of the above clearly for "eligible affordable housing activities."

114

Easy Quiz 6

- When does IHP have to be submitted to HUD?
 - 60 days before the beginning of the Tribe/TDHE program year.
 - September 30
 - 75 days before the beginning of the Tribe's/TDHE's program year.
 - July 1
 - None of the above, the IHP only has to be approved by the Tribal Chairperson in order to receive IHBG funds.

115

Annual Performance Report

Overview

116

Why is the APR Important?

- Statutory requirement
- Public comment
- Tool to track IHP progress
- Self-assessment and planning
- Technical assistance necessary from HUD
- Public information
- Inform Congress

117

Section 5: Budget



- Tracked to funds in & out for 12-month program year
- Uses now provided not only by statutory section but also by planned program
- Part of table II related to outcomes now tied to programs in previous table (categories differ)
- Cost over-run section included in section on unit costs

121

Section 5: Sources and Uses of Funds



- IHP specified estimated amounts anticipated by funding source; APR specifies *actual* amounts received.
- IHP specified estimated expenditures by funding source and by activity; APR specifies *actual* amounts expended.

122

Other Submission Items

APR11 • 55-IH-46-04340 • CROW CREEK HOUSING AUTHORITY • APR Report for 2021

Other Submission Items: Other Submission Items (see general IHP and APR notices regarding 55-IH-46-04340 for regulations). Some fields must be submitted by all entities, and others may not be applicable to a particular recipient.

<p>1. Budget Narrative</p> <p>2. Financial Statements</p> <p>3. Other Information</p> <p>4. Other Submission Items</p> <p>5. Other Submission Items</p> <p>6. Other Submission Items</p> <p>7. Other Submission Items</p> <p>8. Other Submission Items</p> <p>9. Other Submission Items</p> <p>10. Other Submission Items</p> <p>11. Other Submission Items</p> <p>12. Other Submission Items</p> <p>13. Other Submission Items</p> <p>14. Other Submission Items</p> <p>15. Other Submission Items</p> <p>16. Other Submission Items</p> <p>17. Other Submission Items</p> <p>18. Other Submission Items</p> <p>19. Other Submission Items</p> <p>20. Other Submission Items</p> <p>21. Other Submission Items</p> <p>22. Other Submission Items</p> <p>23. Other Submission Items</p> <p>24. Other Submission Items</p> <p>25. Other Submission Items</p> <p>26. Other Submission Items</p> <p>27. Other Submission Items</p> <p>28. Other Submission Items</p> <p>29. Other Submission Items</p> <p>30. Other Submission Items</p> <p>31. Other Submission Items</p> <p>32. Other Submission Items</p> <p>33. Other Submission Items</p> <p>34. Other Submission Items</p> <p>35. Other Submission Items</p> <p>36. Other Submission Items</p> <p>37. Other Submission Items</p> <p>38. Other Submission Items</p> <p>39. Other Submission Items</p> <p>40. Other Submission Items</p> <p>41. Other Submission Items</p> <p>42. Other Submission Items</p> <p>43. Other Submission Items</p> <p>44. Other Submission Items</p> <p>45. Other Submission Items</p> <p>46. Other Submission Items</p> <p>47. Other Submission Items</p> <p>48. Other Submission Items</p> <p>49. Other Submission Items</p> <p>50. Other Submission Items</p> <p>51. Other Submission Items</p> <p>52. Other Submission Items</p> <p>53. Other Submission Items</p> <p>54. Other Submission Items</p> <p>55. Other Submission Items</p> <p>56. Other Submission Items</p> <p>57. Other Submission Items</p> <p>58. Other Submission Items</p> <p>59. Other Submission Items</p> <p>60. Other Submission Items</p> <p>61. Other Submission Items</p> <p>62. Other Submission Items</p> <p>63. Other Submission Items</p> <p>64. Other Submission Items</p> <p>65. Other Submission Items</p> <p>66. Other Submission Items</p> <p>67. Other Submission Items</p> <p>68. Other Submission Items</p> <p>69. Other Submission Items</p> <p>70. Other Submission Items</p> <p>71. Other Submission Items</p> <p>72. Other Submission Items</p> <p>73. Other Submission Items</p> <p>74. Other Submission Items</p> <p>75. Other Submission Items</p> <p>76. Other Submission Items</p> <p>77. Other Submission Items</p> <p>78. Other Submission Items</p> <p>79. Other Submission Items</p> <p>80. Other Submission Items</p> <p>81. Other Submission Items</p> <p>82. Other Submission Items</p> <p>83. Other Submission Items</p> <p>84. Other Submission Items</p> <p>85. Other Submission Items</p> <p>86. Other Submission Items</p> <p>87. Other Submission Items</p> <p>88. Other Submission Items</p> <p>89. Other Submission Items</p> <p>90. Other Submission Items</p> <p>91. Other Submission Items</p> <p>92. Other Submission Items</p> <p>93. Other Submission Items</p> <p>94. Other Submission Items</p> <p>95. Other Submission Items</p> <p>96. Other Submission Items</p> <p>97. Other Submission Items</p> <p>98. Other Submission Items</p> <p>99. Other Submission Items</p> <p>100. Other Submission Items</p>	<p>1. Budget Narrative</p> <p>2. Financial Statements</p> <p>3. Other Information</p> <p>4. Other Submission Items</p> <p>5. Other Submission Items</p> <p>6. Other Submission Items</p> <p>7. Other Submission Items</p> <p>8. Other Submission Items</p> <p>9. Other Submission Items</p> <p>10. Other Submission Items</p> <p>11. Other Submission Items</p> <p>12. Other Submission Items</p> <p>13. Other Submission Items</p> <p>14. Other Submission Items</p> <p>15. Other Submission Items</p> <p>16. Other Submission Items</p> <p>17. Other Submission Items</p> <p>18. Other Submission Items</p> <p>19. Other Submission Items</p> <p>20. Other Submission Items</p> <p>21. Other Submission Items</p> <p>22. Other Submission Items</p> <p>23. Other Submission Items</p> <p>24. Other Submission Items</p> <p>25. Other Submission Items</p> <p>26. Other Submission Items</p> <p>27. Other Submission Items</p> <p>28. Other Submission Items</p> <p>29. Other Submission Items</p> <p>30. Other Submission Items</p> <p>31. Other Submission Items</p> <p>32. Other Submission Items</p> <p>33. Other Submission Items</p> <p>34. Other Submission Items</p> <p>35. Other Submission Items</p> <p>36. Other Submission Items</p> <p>37. Other Submission Items</p> <p>38. Other Submission Items</p> <p>39. Other Submission Items</p> <p>40. Other Submission Items</p> <p>41. Other Submission Items</p> <p>42. Other Submission Items</p> <p>43. Other Submission Items</p> <p>44. Other Submission Items</p> <p>45. Other Submission Items</p> <p>46. Other Submission Items</p> <p>47. Other Submission Items</p> <p>48. Other Submission Items</p> <p>49. Other Submission Items</p> <p>50. Other Submission Items</p> <p>51. Other Submission Items</p> <p>52. Other Submission Items</p> <p>53. Other Submission Items</p> <p>54. Other Submission Items</p> <p>55. Other Submission Items</p> <p>56. Other Submission Items</p> <p>57. Other Submission Items</p> <p>58. Other Submission Items</p> <p>59. Other Submission Items</p> <p>60. Other Submission Items</p> <p>61. Other Submission Items</p> <p>62. Other Submission Items</p> <p>63. Other Submission Items</p> <p>64. Other Submission Items</p> <p>65. Other Submission Items</p> <p>66. Other Submission Items</p> <p>67. Other Submission Items</p> <p>68. Other Submission Items</p> <p>69. Other Submission Items</p> <p>70. Other Submission Items</p> <p>71. Other Submission Items</p> <p>72. Other Submission Items</p> <p>73. Other Submission Items</p> <p>74. Other Submission Items</p> <p>75. Other Submission Items</p> <p>76. Other Submission Items</p> <p>77. Other Submission Items</p> <p>78. Other Submission Items</p> <p>79. Other Submission Items</p> <p>80. Other Submission Items</p> <p>81. Other Submission Items</p> <p>82. Other Submission Items</p> <p>83. Other Submission Items</p> <p>84. Other Submission Items</p> <p>85. Other Submission Items</p> <p>86. Other Submission Items</p> <p>87. Other Submission Items</p> <p>88. Other Submission Items</p> <p>89. Other Submission Items</p> <p>90. Other Submission Items</p> <p>91. Other Submission Items</p> <p>92. Other Submission Items</p> <p>93. Other Submission Items</p> <p>94. Other Submission Items</p> <p>95. Other Submission Items</p> <p>96. Other Submission Items</p> <p>97. Other Submission Items</p> <p>98. Other Submission Items</p> <p>99. Other Submission Items</p> <p>100. Other Submission Items</p>
--	--

123



Sections 10: Self Monitoring

- **Purpose:** Provide certification
- **Statutory/Regulatory Sections:** NAHASDA §403(b) , 24 CFR §1000.502
- **Key Contents:**
 - Self-Monitoring

125

Section 10: Self-Monitoring

Self-Monitoring

1 Do you have a procedure and/or policy for self-monitoring?

2 Pursuant to 24 CFR § 1000.502 (b) when the applicant is a "DHS" or the "DHS" provide enough agency reports including the self-monitoring report as determined by the NAHASDA and send them to the "DHS"

3 Do you conduct self-monitoring activities on a regular basis?

4 Self-Monitoring Results Describe the results of the monitoring activities, including corrective actions planned or taken. Describe the results of the monitoring activities, including inspections for this program year.

Yes No Not Applicable

Yes No Not Applicable

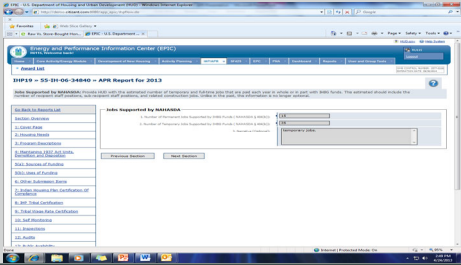
Yes No

We continued to monitor the progress made on accomplishing the program activities described in our JRF during the plan year covered by this report. Our monitoring consists of 3 components measured by NAHASDA including our APR, our self-monitoring compliance assessment, and our annual audits. We are continuing to develop the capacity and capability to conduct more of our accounting services "in-house". We now produce accurate and timely financial reports that enable us to monitor our financial status in a more efficient manner. We also had an audit completed for our 2020 plan.

Previous Section Next Section

126

Section 14: Jobs Supported by NAHASDA



HUD Review of the APR

- **On time?**
Due 90 days following end of program year
- **Complete?**
Sufficient data for review
- **Accurate?**
Based on reports and internal consistency
- **Progress?**
Progress on IHP program/performance issues
- APR cannot be processed if it includes an activity that has not been submitted for Area ONAP review and concurrence.

131

HUD's Timeline

- Receipt of APR
 - 60 days to review APR and make recommendations in report to recipient
 - Carried out eligible activities in a timely manner and in accordance with NAHASDA
 - Complied with the IHP
 - Report is accurate



132

Easy Quiz 7

- The Tribe/TDHE submits the IHP & APR online to HUD using EPIC. What does the acronym EPIC stand for?
 - Something that's awesome.
 - Energy & Performance Information Center.
 - Online game store.
 - Every Program Information Center
 - None of the above.

133

IHP/APR Management Requirements

134

Grant Agreement

- Sign agreement after plan is found by ONAP to be in compliance
- Legal document sets out grant award and obligation to follow requirements
 - HUD 52734B
- Other required forms
 - HUD 27054
 - SF 1199A
 - Lobbying certificate
 - Assurance of compliance
 - Indian preference certification



Grant Steps

1. Complete grant agreement
2. Obtain eLOCCS access
3. Complete/submit other materials



Electronic Line of Credit Control System (eLOCCS)

- Computerized cash management disbursement system
- Submit form HUD 27054 to get set up
- HUD enters budget into eLOCCS – draw against BLI (budget line item)
- Guidance 2014-08(R) provides instructions on accessing eLOCCS.

Reporting

- Submit LOCCS reports
 - SF 425
 - Within 90 days of end of each program year
 - See HUD Notice PIH 2022-15 for more info
- Annual performance report
 - Reports on annual tasks
 - Due 90 days after end of program year



Tracking for Effectiveness



- Recordkeeping & tracking outcome & cost data
- Internal forms & procedures
- eLOCCS
- SF-425s

139

Recordkeeping/Tracking



- Annual project plan
- Laminate poster size plan of
 - Program description
 - Tasks
 - Costs
- Monthly reports
- Checklists to facilitate tracking on a monthly basis

140

Importance of Monitoring



141

Overview of Management Requirements

- Review and track performance
 - Project evaluation
 - Financial tracking
 - Monthly reporting
 - Recordkeeping
 - Policy enforcement
 - See Self-Monitoring Guidebook and Monitoring Plans for Recipients
- http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/ih/grants/oversight



142

Unit Inspection Policy & Procedures



- Develop written policy to inspect units annually
- Establish methodology that plans use of limited resources
- Establish policy on how often different types of units must be inspected

143

2 CFR 200.500-521 Audit Requirements



- If total amount of Federal awards expended during the FY is **\$750,000 or more**, check the box for “yes” and report on timeliness of audit submission.
- If total amount of Federal awards expended during the FY **less than \$750,000**, check the box for “no”. No further action needed.
- Watch for updates – thresholds subject to change

144

Summary

- IHP/APR is a combined form
- Items required by statute or regulation
- One open grant
- Results are easily collected for reporting purposes
- Form includes lists of eligible activities and proposed outcomes
- Required Monitoring tracks progress on activities



45

That's all Folks!

46
