

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

September 27 & 28, 2023
Virtual Training

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Introductions


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



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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.



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Key Concepts


Section One

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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.



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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.

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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




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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



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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.

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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

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IHBG FORMULA


Section Two

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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

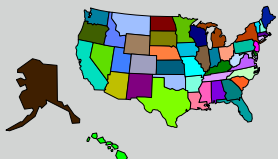


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Formula Area

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



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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

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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.

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Population Cap

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



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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 2023 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. 07/31/2025)
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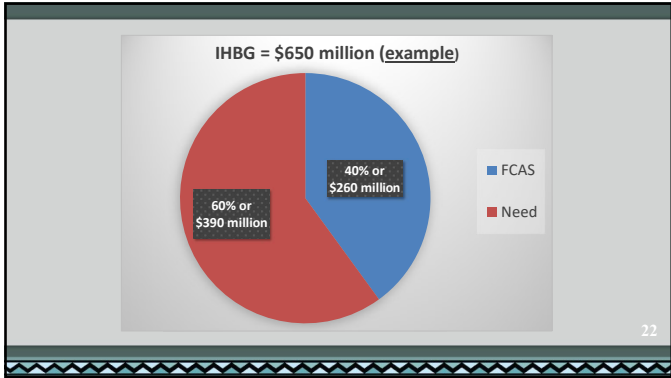
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Four Formula Components

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




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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



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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

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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

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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.

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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

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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.

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Component 2: Need

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



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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%

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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.


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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

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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.

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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



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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.

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ALLOWABLE ACTIVITIES

Section Three

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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**.

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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

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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

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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

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Indian Housing Assistance
(Primarily for 1937 act housing)

Modernization Operations Maintenance Utility Subsidies

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Development

Acquisition Construction Rehabilitation Conversion Energy Improvements

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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

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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

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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



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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.

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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

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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)!

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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.

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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

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DEVELOPING THE IHP


Section Four

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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



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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?

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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?

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Recommended Steps in Developing IHP

```
graph TD; A[Form a vision] --> B[Collect data]; B --> C[Determine needs]; C --> D[Develop strategy]; D --> E[Identify resources]; E --> F[Set priorities]; F --> G[Develop programs]
```

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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.

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Collect Data

- Surveys
- Census
- Meetings



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Determine Needs



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Develop Strategy



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Identify Resources



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Set Priorities



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Develop Programs

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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

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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

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THE INDIAN HOUSING PLAN

Section Five

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What is an IHP?

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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.

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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

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Submitting the IHP: How?

- An IHP may be submitted to an Area ONAP using the recently released new HUD system named GEMS. GEMS replaces the old EPIC system. HUD is completing webinar trainings for the switch to GEMS currently.

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Grants Evaluation Management Systems (GEMS)

- What is GEMS? A HUD-information technology system debased system originally designed to simplify the grant management process for Tribal recipients.
- GEMS doesn't change current program and grant administration requirements but modernizes administrative and reporting systems.
- GEMS replaces the Energy Performance Information Center (EPIC) to centralize and streamline required submissions and communications to reduce the administrative burden on recipients.



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GEMS: Latest Information

- Beginning June 5, 2023, recipients in Alaska and the Northern Plain ONAP Region are required to submit their IHPs and APRs using the online GEMS system.
- ONAP has now rolled out GEMS to all grant recipients.
- Each Area ONAP will work with grant recipients when they are able to access the system and will assist with setting up usernames and passwords for the system.
- Here is ONAP's website for more information about GEMS:
https://www.hud.gov/program_offices/public_indian_housing/ih/grants/GEMS

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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)

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IHP Deadlines and Waivers

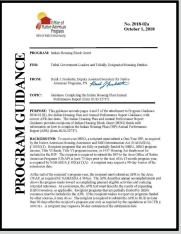
- Extension may be granted under exceptional circumstances
- HUD cannot waive a due date outside of the statutory limit provided in Section 101(b)(2) of NAHASDA
- Request waiver of the deadline -
 - any time before or after the IHP submission deadline, however ...
 - extension may only be granted for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

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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 GEMS form.



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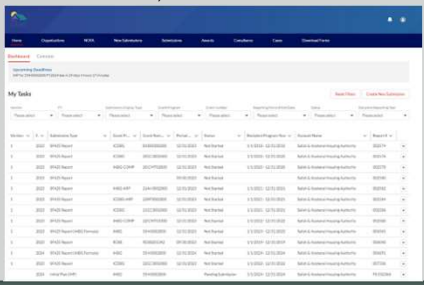
Key Sections of the IHP

- 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)

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The Section Progress screen shows all sections of an IHP/APR and identifies the status of each section. To access these sections, click on the underlined section title or Visit Section.




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Section 1: Cover Page

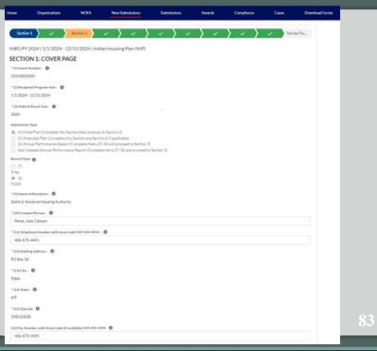
- **Purpose:** Provide basic background info on recipient
- **Statutory/Regulatory Sections:** None
- **Key Contents:**
 - Name, contact info
 - Tax ID
 - Plan period (Federal grant year)
 - Grant amount
 - Signatures
 - DUNS number (now required for all Federal grants)
 - CCR/SAM registration must be updated annually
 - Recipient program year



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Section 1 (Cover Page). Enter information in white boxes and verify the information provided in the grayed out boxes. Grayed out fields are auto-populated by HUD. If there are errors in any of these fields, inform your ONAP office.




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Section 2: Housing Needs (page 5)

- **Purpose:** Clearly describe the types of needs for recipients
- **Statutory/Regulatory Sections:** §1000.328, 102(c)(2)(A), 102(c)(2)(B), 102(c)(4)(C)
- **Key Contents:**
 - Number of low-income Indian families
 - Needs for all Indian families
 - Description of how activities meet needs
 - Geographic distribution of funds



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Section 2 (Housing Needs).

SECTION 2: HOUSING NEED
 ANNUAL REPORT

Use the table below to describe the estimated need for housing units and the need for other assistance for the proposed project. Indicate the number of units and the number of other assistance units for each category.

Check the box in the "Housing Needs" column.

Housing Needs	Estimated Need	Other Assistance
<input type="checkbox"/> Single-Family		
<input type="checkbox"/> Multi-Family		
<input type="checkbox"/> Homeless		
<input type="checkbox"/> Elderly		
<input type="checkbox"/> Disabled		
<input type="checkbox"/> Low Income		
<input type="checkbox"/> Other		
<input type="checkbox"/> Total		

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Section 3: Program Descriptions & Outputs

- **Purpose:** Describe recipient's programs & intended results
- **Statutory/Regulatory Sections:** §102(c)(1), 102(c)(4)(e-g)
- **Key Contents:**
 - Program description
 - Eligible activity
 - Intended outcomes
 - Beneficiaries & assistance
 - Planned outputs

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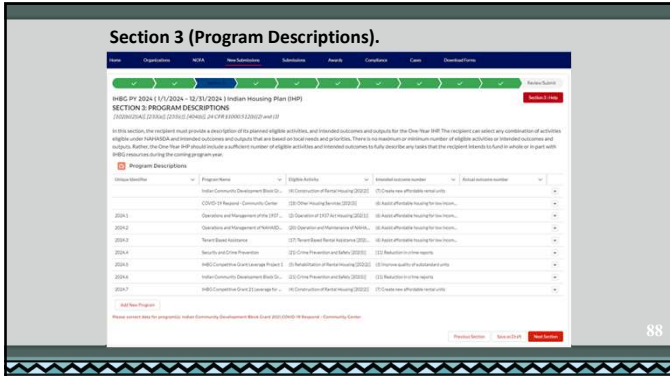
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Preparing Program Descriptions

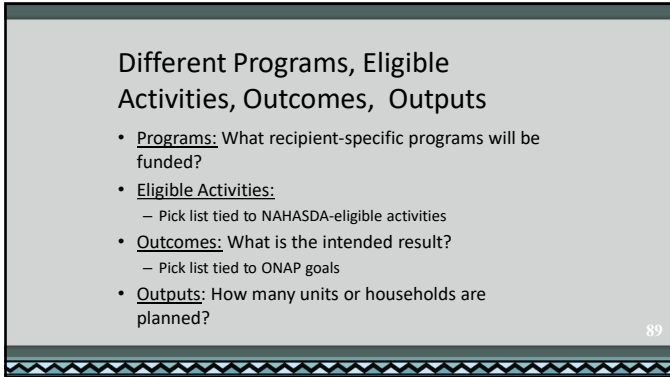
DO NOT COMBINE HOMEOWNERSHIP AND RENTAL UNITS UNDER ONE CONSTRUCTION PROGRAM, ACQUISITION, OR REHAB.

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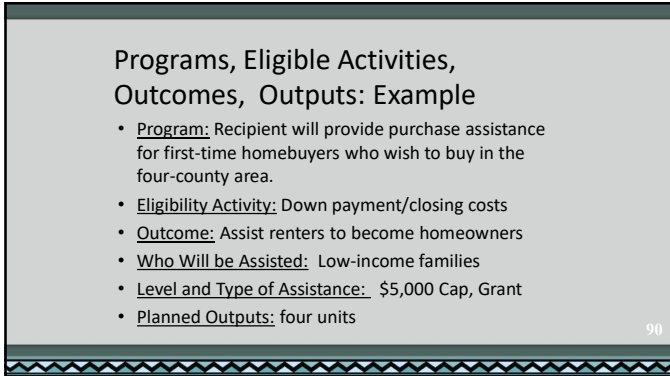
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Guidance on Outputs

Eligible Activity	Output Measure	Eligible Activity	Output Measure
(1) Modernization of 1937 Act Housing [20211]	Units	(13) Down Payment/Closing Cost Assistance [20221]	Units
(2) Operation of 1937 Act Housing [20211]	Units	(14) Lending Subsidies for Homebuyers (Loan) [20222]	Units
(3) Acquisition of Rental Housing [20221]	Units	(15) Other Homebuyer Assistance Activities [20222]	Units
(4) Construction of Rental Housing [20222]	Units	(16) Rehabilitation Assistance to Existing Homeowners [20223]	Units
(5) Rehabilitation of Rental Housing [20223]	Units	(17) Tenant Based Rental Assistance [20231]	Households
(6) Acquisition of Land for Rental Housing [20223]	Units	(18) Other Housing Services [20231]	Households
(7) Development of Emergency Shelters [20223]	Households	(19) Housing Management Services [20241]	Households
(8) Conversion of Other Structures to Affordable Housing [20223]	Units	(20) Operation and Maintenance of NAAHSDA-Assisted Units [20241]	Units
(9) Other Rental Housing Development [20223]	Units	(21) Crime Prevention and Safety [20251]	Dollars
(10) Acquisition of Land for Homebuyer Unit Development [20223]	Units	(22) Model Activities [20251]	Dollars
(11) New Construction of Homebuyer Units [20223]	Units	(23) Self-Determination Program [231-235]	Units/ Dollars
(12) Acquisition of Homebuyer Units [20223]	Units	(24) Infrastructure to Support Housing [20221]	Dollars
		(25) Reserve Accounts [20229]	N/A

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Section 3 (Program Descriptions). Continued...

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Section 4: Maintaining 1937 Act, Demolition/Disposition

- **Purpose:** Describe how recipient will maintain 1937 Act units, describe any planned demo/dispo
- **Statutory/Regulatory Sections:**
 § 102(b)(2)(A)(iv)(I-III)
- **Key Contents:**
 - Describe how will maintain & operate 1937 units
 - Describe any planned demolition or disposition

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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 IHGB funds anticipated to be expended on each program
 - Prior and current year Other funds anticipated to be expended on each program

Section 5(b) (Uses of Funding for IHPs). All data on this table is derived from information contained in the Program Descriptions Section of the IHP except for Planning and Administration and Loan Repayments. If there are errors identified, calculate totals and save. You may have to do this several times for both the sources and uses of funding tables in order to eliminate the error messages.

Item	2019	2020	2021
2019 IHGB (Includes 2019 IHGB) (Includes 2019 IHGB)			
2020 IHGB (Includes 2020 IHGB) (Includes 2020 IHGB)			
2021 IHGB (Includes 2021 IHGB) (Includes 2021 IHGB)			
2019 Other (Includes 2019 Other) (Includes 2019 Other)			
2020 Other (Includes 2020 Other) (Includes 2020 Other)			
2021 Other (Includes 2021 Other) (Includes 2021 Other)			
TOTAL	\$100,000.00	\$100,000.00	\$100,000.00

Section 6: Other Submission Items

- **Purpose:** Describe various required items
- **Statutory/Regulatory Sections:** § 1000.142, 1000.108, 1000.120, 1000.302(3), 1000.238
- **Key Contents:**
 - Useful life
 - Model activities & over income
 - Tribal preference
 - Administration
 - Expanded formula area

Section 6 (Other Submission Items). Useful life, Model Activities, Indian Preference, etc.

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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

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Section 7 (IHP Certification of Compliance).

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Attachments

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Review/Submit Confirmation

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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

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Timeframes for ONAP IHP Review

- 60 days for original submission
- 30 days for amendments



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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?

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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.”

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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.

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Annual Performance Report

Overview

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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

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Key Sections of the APR

- Actual Outputs and Accomplishments (Section 3)
- Sources and Uses of Funds (Section 5)
- Expanded Formula Area (Section 6)
- Self Monitoring (Section 10)
- Inspections (Section 11)
- Audits (Section 12)
- Public Accountability (Section 13)
- Jobs Supported by NAHDSA (Section 14)

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Section 3: Reporting on Programs

- **Purpose:** Document the recipient’s performance review
- **Statutory/Regulatory Sections:** § 404(a), 404(b)(2), 404(b)(3), 404(b)(4), 1000.512
- **Key Contents:**
 - Accomplishments
 - Reasons for delay
 - Outputs

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Eligible Activities & Outputs


Eligible Activity	Output Measure	Eligible Activity	Output Measure
(1) Modernization of 1937 Act Housing (2021)(1)	Units	(13) Case Payment/Clearing Cost Assistance (2023)	Units
(2) Operation of 1937 Act Housing (2021)(1)	Units	(14) Lending Subsidies for Homebuyers (2023)	Units
(3) Acquisition of Rental Housing (2022)	Units	(15) Other Homebuyer Assistance Activities (2023)	Units
(4) Construction of Rental Housing (2022)	Units	(16) Rehabilitation Assistance to Existing Homeowners (2022)	Units
(5) Rehabilitation of Rental Housing (2022)	Units	(17) Tenant-Based Rental Assistance (2023)	Households
(6) Acquisition of Land for Rental Housing Development (2022)	Acres	(18) Other Housing Services (2023)	Households
(7) Development of Emergency Shelters (2022)	Households	(19) Housing Management Services (2024)	Households
(8) Conversion of Other Structures to Affordable Housing (2022)	Units	(20) Operation and Maintenance of NAHDSA-Assisted Units (2024)	Units
(9) Other Rental Housing Development (2022)	Units	(21) Crime Prevention and Safety (2023)	Dollars
(10) Acquisition of Land for Homebuyer Unit Development (2023)	Acres	(22) Model Activities (2024)	Dollars
(11) New Construction of Homebuyer Units (2023)	Units	(23) Deprec. Not Inherently Available	NA
(12) Acquisition of Homebuyer Units (2023)	Units	(24) Mortgage to Support Housing (2023)	Dollars
		(25) Reserve Accounts (2024)	NA

(1) Reduce crime/crime-related	(7) Create new affordable rental units
(2) Reduce crime in public housing areas	(8) Assess affordable housing for change studies
(3) Improve quality of self-stored units	(9) Provide accessibility for disabled elderly persons
(4) Improve quality of existing self-storage	(10) Improve energy efficiency
(5) Address homelessness	(11) Reduce time to issue report
(6) Assess affordable housing for low income households	(12) Reduce time to issue report
	(13) Other - use specific description in Line 1 of APR and Line 1.5 (APR)

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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

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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.

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Other Submission Items



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Sections 10-14

Self
Monitoring

Inspections

Audits

Public
Accountability


Jobs
Supported

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Sections 10: Self Monitoring

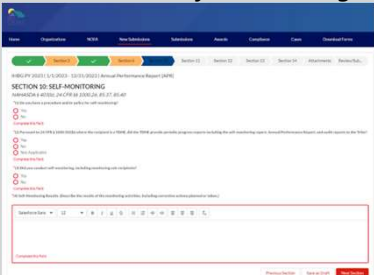
- **Purpose:** Provide certification
- **Statutory/Regulatory Sections:** NAHASDA §403(b) , 24 CFR §1000.502)
- **Key Contents:**
 - Self-Monitoring



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Section 10: Self-Monitoring



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Section 11: Inspections

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Section 12: Audits

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Section 13: Public Availability

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Section 14: Jobs Supported by NAHASDA

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Attachments

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Review/Submit Confirmation

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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.

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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



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Easy Quiz 7

- The Tribe/TDHE submits the IHP & APR online to HUD using GEMS. What does the acronym GEMS stand for?
 - Great Energy Management System.
 - A nice Valentine's Day present.
 - Online game store.
 - Grants Evaluation Management System
 - None of the above.

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IHP/APR Management Requirements

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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



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Grant Steps

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



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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.

The image shows a form titled "eLOCCS Access Authorization Form" from the U.S. Department of Housing and Urban Development. It includes fields for user information, system access requests, and administrative approvals. The form is divided into sections for user details, system access, and administrative actions.

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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



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Tracking for Effectiveness




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

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Recordkeeping/Tracking



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

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Importance of Monitoring


Compliance	Consistency
Efficiency	Effectiveness

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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

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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

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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

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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



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Questions, Comments, and Wrap-up.



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