

**Indian Community Development Block Grant (ICDBG)
NOFA
Questions and Answers**

Application Submission

Q.1. Who do I call if I am having trouble submitting my application electronically?

A.1. You should either call or e-mail the Grants.gov helpdesk at your first sign of difficulty. Do not wait until the last few days to submit because you may encounter unanticipated problems.

Q.2. Where can I find the application forms to submit with my application?

A.2. All of the forms can be found when you download the application from Grants.gov. Some of them are with the Application Instructions and others are in the Application Package itself.

Q.3. What version of Adobe do I need to download the instructions and application forms?

A.3. You should use Adobe 9.2.3 or the latest version available from Grants.gov. Please refer to pages 39-41 of the General Section of the FY 2010 NOFA for more information on Adobe. You can also contact the Grants.gov help desk at 1-800-518-4726 or support@grants.gov.

Q.4. Can an applicant request more than the grant ceiling when it applies for ICDBG funds?

A.4. No. The annual ICDBG NOFA specifies that *“An application may include more than one project, but it cannot exceed the ceilings listed in Section II.”*

Q.5. Can a tribe submit an ICDBG application to an Area ONAP other than the Area ONAP in which the tribal headquarters is located?

A.5. No. ICDBG funds are allocated to the six Area ONAPs according to a formula in the ICDBG regulation at 24 CFR 1003.101. Specifically, funds are based on each Area ONAP’s share of: the total eligible Indian population; the total extent of poverty among the eligible population; and the share of the total extent of overcrowded housing among the eligible Indian population.

Q.6. Is an applicant required to provide a signed tribal resolution for the commitment of the operation and maintenance of a project or is a letter of commitment acceptable?

A.6. A letter of commitment is acceptable if it indicates that the tribe is committing the necessary funds to provide operation and maintenance. Rating Factor 3 of the NOFA requires a written statement that the tribe has adopted the operation and maintenance plan and commits the necessary funds to provide for the responsibilities.

Q.7. Is an applicant required to submit the Code of Conduct with its application?

A.7. The General Section of the NOFA provides guidance regarding Codes of Conduct (Code). If the applicant's Code is not listed on HUD's website at <http://www.hud.gov/offices/adm/grants/codeofconduct/cconduct.cfm> or if the information on the website has changed, the applicant must submit a copy of its Code with its application. If the applicant is submitting electronically, the Code should be faxed using form HUD-96011 to 1-800-HUD-1010. If the applicant has received a waiver and is submitting a paper application, the Code should be e-mailed to the Area ONAP with its application.

Q.8. How is the absence of a Code of Conduct treated?

A.8. If an ICDBG applicant is required to submit its Code with its funding application but does not, the Area ONAP may treat this as a technical deficiency. The absence or presence of the Code itself does not affect the rating of the application.

Q.9. Is the 15 page narrative limit inclusive of all five factors combined or 15 pages per factor?

A.9. The 15 page limit is not mandatory, it is just a suggestion that applies to all five factors.

Q.10. Is the cost summary (form HUD-4123) the only component which requires a form for each respective project?

A.10. Yes.

Q.11. For the citizen participation requirements, does the tribe utilize the entire tribal population or just the population per community?

A. 11. Applicants should use traditional methods to involve the whole community in the development of the application.

Q.12. Are community hearings required for all eligible projects?

A.12. Applicants are required to follow traditional means of resident involvement which at least means providing information about the funds available for proposed community development and housing activities and holding one or more meetings to obtain the view of residents on community development needs. See 24 CFR 1003.604.

Q.13. If you are submitting as a tribal organization, does the citizen participation resolution have to be submitted from the tribe or the tribal organization?

A.13. If a tribal organization is applying on behalf of the tribe, it must include a resolution approved by the tribe that indicates that its citizens were involved in the development of the application in accordance with 24 CFR 1003.604.

Q.14. Under Rating Factor 2, Subfactor 2 (Project Benefit), would the applicant have to submit a demographic data statement and supporting documentation for groups of people such as abused children, battered spouses, and the elderly who meet the low-and moderate-income (LMI) requirement under the primary objective as limited clientele?

A.14. Yes. ICDBG projects that benefit populations or groups of people identified in the ICDBG regulation at 24 CFR 1003.208(b)(1)(i) meet the primary objective of the ICDBG program and would pass initial screening. However, to receive points under Factor 2, Subfactor 2, the applicant must still provide census data or a demographic data statement and supporting documentation to establish the actual percent of beneficiaries who are of LMI status (80 percent of median income).

Q.15. Under what circumstances can the Area ONAP Administrator approve an exception to the Housing Rehabilitation Threshold Requirement?

A.15. Section III.C.3.a. of the ICDBG NOFA permits ICDBG funds to be used to rehabilitate housing if the tribe has adopted housing rehabilitation standards and policies. It also states that funds can be used to rehabilitated HUD-assisted homes if the applicant provides a written statement that funds will be used for such purposes only when the homebuyer's payments are current or the homebuyer is current in a repayment agreement. This requirement on HUD-assisted homes is the only provision in the Housing Rehabilitation Project Threshold that the Area ONAP Administration may approve exceptions to. The NOFA says: *"The ONAP Administrator, on a case-by-case basis, may approve exceptions to this requirement if the applicant provides adequate justification for the exception with its application."* The ICDBG regulation at 24 CFR 1003.302(a) provides for this exception also.

Q.16. If a housing entity or tribal organization, as described in 24 CFR 1003.5, applies for ICDBG funding on behalf of a tribe, who will the Area ONAP staff deal with directly and which entity will have an account established in LOCCS?

A.16. Eligible applicants for ICDBG funds are Indian tribes or tribal organizations eligible under Title I of the Indian Self-Determination and Education Assistance Act. To apply for funding, the applicant must be eligible as required by 24 CFR 1003.5 by the application due date. All forms and certifications will be signed by the eligible applicant and that is the entity that will have an account established in LOCCS. A Subrecipient will not have an account established in LOCCS.

Q.17. What is the definition of “in-kind contribution(s)” vs. “in-kind resource(s)”?

A.17. Neither the ICDBG regulation or the ICDBG NOFA expressly defines in-kind contributions or resources. However, in general, in-kind contribution(s) and in-kind resource(s) are non-cash contributions, generally contributions of goods, services, and land that can be given a cash value. In Rating Factor 4, points are awarded based on the non-ICDBG resources provided. Contributions that can be considered as leveraged resources for point award include but are not limited to in-kind contributions and resources.

Q.18. In Rating Factor 1, does the applicant have to actually state that its financial management and procurement and contract management policies meet the requirements of 24 CFR Part 85 and Part 1003, or is it sufficient to describe how the financial management and procurement management systems meet the requirements?

A.18. The applicant does not have to actually cite the regulation. It just has to show how it complies with or will comply with the requirements of these two regulations.

Q.19. Where can I find a sample of a successful application – one that was funded?

A.19. There are two places. You can go to:

http://portal.hud.gov/portal/page/portal/HUD/program_offices/administration/foia/highscore and there you will find high scoring successful applications from FY 2008 and 2007.

The Alaska ONAP has also posted examples of the following four types of projects in its region on its webpage <http://www.hud.gov/offices/pih/ih/codetalk/onap/akonap/>

Q.20. The FY 2010 NOFA on page 14 (f) Construction Tools and Equipment says “Exceptions include construction tools and equipment purchased for use as part of a solid waste facility (24 CFR 1003.201(c)(1)(ii))...” However, 24 CFR 1003.201(c)(1)(ii) actually states “However, the purchase of construction equipment for use as part of a solid waste facility is eligible.” Does it mean that exceptions are construction tools and construction equipment or construction tools and equipment (which could be non-construction equipment)?

A. 20. The exception is for construction tools and construction equipment for use as part of a solid waste facility.

Q.21. Does the Authorized Organization Representative (AOR) need to be the top executive at the TDHE (Executive Director or can it be the Finance Officer?

A.21. No. The AOR can be whoever the E-Business Point of Contact wants it to be.

Q.22. A tribe’s total enrollment is over 25,000, however it consists of 20 individual tribal communities with varying populations. Does this tribe apply under >6000 category as a tribe or utilize the < 6000 for each community project?

A.22. This tribe would apply as a tribe based on its total population. The application can include several projects in several communities as long as the total amount requested by the tribe does not exceed the application ceiling.

Q.23. What are technical deficiencies?

A.23. A technical deficiency is information that is not submitted with an ICDBG application but that which does not affect the rating of the application. Curable technical deficiencies may include funding request inconsistencies, failure to submit the proper certifications or failure to submit an application that contains a signature by an official able to make a legally binding commitment on behalf of the applicant. Such deficiencies must be satisfactorily addressed before HUD can make a grant award.

Q.24. Will I be told if my application passes the screening and threshold tests and when?

A.24. Your Area ONAP will send you a letter only if you do not meet the initial screening and application and project thresholds. If you meet these thresholds, your application will then be rated on the five rating factors. You will receive a letter from the Area ONAP if your application does not receive sufficient points to be funded and/or if you do.

Eligible Activities

Q.25. Is the purchase of trucks that collect trash an eligible activity?

A.25. The ICDBG regulation at 24 CFR 1003.201(c)(1)(ii) states “...as stated in 1003.207 (b)(1)(i), the purchase of equipment with ICDBG funds is generally ineligible. However, the purchase of construction equipment for use as part of a solid waste facility is eligible.” Landfills and the equipment to maintain the landfill are eligible (i.e. grader, tractor) however, the trucks that collect trash are not. Garbage cans and dumpsters at individuals’ homes are also not eligible.

Q.26. Can ICDBG funds be used for the purchase of housing units that would be occupied by LMI families on a temporary basis, for example when a family member is in a local hospital?

A.26. Yes. The project would be a public facility and would meet the primary objective under the “limited clientele activity” category in 24 CFR 1003.208(b).

Q.27. Can rental units purchased with Indian Housing Block Grant (IHBG) funds be considered HUD-assisted houses and be rehabilitated with ICDBG funding?

A.27. Yes. Units purchased under the IHBG program are HUD-assisted if they are owned and operated by the tribe or tribally designated housing entity (TDHE).

Q.28. Does the Housing Rehabilitation Project Threshold apply to privately-owned homes?

A.28. Yes. If an applicant wishes to use ICDBG funds to rehabilitation housing, it must have adopted housing rehabilitation standards and policies before it submitted the application. However, if funds are used to rehabilitate private housing, neither the ICDBG regulation nor NOFA requires that the homebuyers' payments be current.

Q.29. Is the construction of a "foster care" facility an eligible ICDBG activity?

Q.29. Yes. This type of a project would be considered a "public facility" in accordance with 24 CFR 1003.201(c). Such a facility would be "designed for use in providing shelter for persons having special needs..."

Q.30. Can homeownership assistance only be proposed as part of another project, similar to public services.

A.30. No, homeownership assistance does not have to be proposed as part of another project. It can be a stand-alone project.

Applicant Eligibility

Q.31. Can a non-Federally recognized tribe apply for ICDBG?

A.31. Yes, in certain instances. Eligible applicants are any Indian tribe, band, group, or nation, including Alaska Indians, Aleuts, and Eskimos, and any Alaska Native Village of the United States which is considered an eligible recipient under Title I of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 450) or which had been an eligible recipient under the State and Local Fiscal Assistance Act of 1972 (31 U.S.C. 1221).

Policy Priorities/Logic Model (FY 2010)

Q.32. For the HUD policy priorities section, each section says that grantees will need to report on outcomes. Do these activities then need to be reflected in the Logic Model?

A.32. Yes. Applicants should select the activities and outcomes from the dropdown menus in the Logic Model that most closely reflect the activities proposed to achieve the applicable policy priority point/s.

Q.33. How detailed does my application need to be when it comes to the HUD policy priority or priorities that I have chosen to address?

A.33. You can choose to address one or both of the policy priorities and thereby seek to obtain one point for each one. Within each of the two priorities there are again options to choose from. The policy priority one Job Creation/Employment has two options and the policy priority

on Sustainability has three options. You should explain in your application narrative how you will address whichever option you choose within each priority. You can see the types of things that HUD will be looking for in the Logic Model under the list of policy priority choices in the drop downs for activities and outcomes.

For example, option a. under the Job Creation/Employment priority looks at the links between transportation services and job creation whereas option b. focuses more on job training.

Q.34. For the policy priority on Job Creation/Employment does the phrase “... by partnering with federal and nonprofit agencies, private industry, and other local and regional organizations” mean that the job training or job opportunities cannot be provided by the applicant? Or can the applicant itself be considered a local organization? (i.e. the housing authority’s own on-the-job training program?)

A.34. The job training can be provided by the applicant or other tribal entities/agencies.

Q.37. Can you please clarify what the difference is between options a. and b. for Sustainability? They look very similar.

A.38. Option a. focuses on green building standards used in housing construction or rehabilitation and on the impacts on children or other vulnerable persons who will or currently live in those units. Option b. is broader. It focuses on energy efficiency and green standards and includes both housing units and community facilities.

Q.39. Are the weatherization/energy audit activities and outcomes applicable to option b. in the Sustainability policy priority or are those separate outcomes that will not get points for policy priorities (since they are not specifically mentioned in the NOFA)?

A.39. Yes. These types of activities apply to option b.

Q.40. How do we access the Master Logic model?

A.40. The Logic Model (form HUD-96010) can be found with the other forms when you download the ICDBG application instructions from Grants.gov.

Q.41. There are two Logic Model Policy Priority services/activities that appear to be identical. Is there a difference?

A.41. The only difference is how the activity will be measured. The first drop down asks applicants to identify the number of partners with whom they have partnered to “...expand job opportunities for low-income residents by partnering with federal and non-profit agencies, private industry, and other local and regional organizations.”. The second asks applicants to identify the number of jobs that will be created as a result of such partnerships. Applicants that wish to obtain points for this policy priority can choose to report on one or the other.

Q.42. There are nine outcomes to choose from in the dropdown menu for the second policy priority in the Job Creation/Employment option. Must applicants select more than one of the outcomes to get the policy point?

A.42. No. What is more important is that the applicant address the goals of the policy priority as spelled out in the NOFA. On page 31, the NOFA states that “Grantees will be expected to report on outcomes measures including the number of low- and moderate income persons that receive job training and obtain a job, the number of low- and moderate-income persons that receive career services to identify career paths to improve wages, or the number of low- and moderate income persons that receive support services to enable them to retain their jobs during the grant period.” Applicants will receive a priority point for this second job creation/employment policy priority option they can demonstrate that their activities will help tribal members obtain or retain jobs. Applicants should choose the outputs and outcomes in the Logic Model that most closely relate to what they are proposing to do in the application.