

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT WASHINGTON, D.C. 20410–8000

OFFICE OF PUBLIC AND INDIAN HOUSING

SPECIAL ATTENTION OF:

Administrators, Offices of Native American Programs, Tribes, and Tribally Designated Housing Entities

Notice PIH 2025-02

Issued: January 10, 2025

Expires: This Notice remains in effect until amended, superseded, or rescinded.

Cross References: 83 FR 23710 81 FR 10880 2 CFR Part 200

SUBJECT: Procedural Guidance for Tribal Housing and Urban Development-Veterans Affairs Supportive Housing (Tribal HUD-VASH) Expansion Grant Applications.

Table of Contents

| 1. PROGRAM DESCRIPTION1 | |
|--|--|
| A. Purpose | |
| B. Background | |
| 2. KEY DATES | |
| 3. AWARD INFORMATION AND OVERVIEW | |
| 4. ELIGIBILITY | |
| A. Eligible Applicants | |
| B. Consortiums and Subrecipients | |
| C. Eligible Costs | |
| D. Cost Sharing, Matching and Leveraging | |
| 5. THRESHOLD REQUIREMENTS | |
| A. Existing Grantees Only | |
| B. Civil Rights4 | |

| 6. PROGRAM REQUIREMENTS:5 |
|--|
| A. Minimum/Maximum Award Information |
| B. Use of Formula Current Assisted Stock |
| C. New Housing Construction and Substantial Rehabilitation |
| 7. EXPANSION APPLICATION CONTENTS AND SUBMISSION5 |
| A. Narrative Response6 |
| i. One-Page Proposal Summary 6 |
| ii. Administrative Capacity6 |
| iii. Need6 |
| iv. Description of Proposed Tribal HUD-VASH Program |
| B. VA Commitment of Support |
| C. Tribal Resolution |
| 8. REVIEW AND CORRECTIONS TO APPLICATION ERRORS |
| 9. SELECTION AND AWARD PROCESS |
| 10. RISK EVALUATION8 |
| 11. REPORTING. 9 |
| 12. GENERAL TRIBAL HUD-VASH RESOURCES |
| 13. PAPERWORK REDUCTION ACT9 |

1. PROGRAM DESCRIPTION.

A. Purpose.

This Notice is the initial announcement of the Tribal HUD-VASH expansion application requirements.

Funding Opportunity Number: FR-6900-N-73

Assistance Listing Number: 14.899

Pursuant to the authority provided by the Consolidated Appropriations Act, 2017, <u>P.L.</u> <u>115-31</u> (2017 Appropriations Act), the U.S. Department of Housing and Urban Development (HUD) may use any amounts that remain after Tribal HUD-VASH

recipients receive renewal grants to make new grants available. Such grants provide rental assistance and associated administrative fees to Indian tribes and Tribally Designated Housing Entities (TDHEs) that meet applicable program requirements established in the 2015 Implementation Notice and the 2018 Consolidation Notice, based on need and administrative capacity.

Approximately \$2.2 million is available in fiscal year (FY) 2017 funds for grants to support the expansion of rental assistance for Native American Veterans who are homeless or at risk of homelessness. New applicants and existing grantees are eligible for funding to increase the number of Veterans they can assist. HUD anticipates making seven (7) awards of approximately \$300,000 each.

B. Background.

The Tribal HUD-VASH program provides rental assistance and supportive services to Native American Veterans who are homeless or at risk of homelessness living on or near a reservation or other Indian areas. HUD provides rental and supportive services, and awards renewal grants every year subject to appropriations. The U.S Department of Veterans Affairs (VA) provides case management and clinical services. The goal of the Tribal HUD-VASH program is to reduce the number of Native American Veterans who are homeless or at risk of homelessness. A complete list of program requirements is found in the 2018 Consolidation Notice. The HUD contact for this Notice is TribalHUDVASH@hud.gov.

2. KEY DATES.

The application deadline is May 16, 2025, at 11:59:59 PM Eastern time.

You must submit your application via grants.gov. If your application is received after the deadline HUD will not consider it for review. You can submit your application any time before the deadline; HUD will not prioritize your application based on date and time received. See Section 9, Selection and Award Process, for more information on how HUD will consider applications.

HUD reserves the right to extend the application window if demand does not exceed the total available funding.

Estimated award date: mid-September 2025

Estimated period of performance: The estimated period of performance for grants awarded under this Notice is October 1, 2025, to September 30, 2026, except for applicants proposing to engage in new construction or substantial rehabilitation before they use their Tribal HUD-VASH grants for rental assistance in those constructed or rehabilitated units, as discussed in Section 6(c) of this Notice. Such applicants' period of performance will be based on the proposed project, up to five years from the estimated start date, i.e. October 1, 2025, to September 30, 2030. **You can**

only use Tribal HUD-VASH grants awarded under this Notice for rental assistance and eligible administrative costs.

3. AWARD INFORMATION AND OVERVIEW.

Successful applicants will be funded based on the total units awarded, multiplied by monthly Fair Market Rent (FMR), multiplied by 12 months. If FMRs in your geographic service area vary, HUD will use the highest FMRs (per unit size) that are available for your area when calculating awards. HUD will also provide administrative fees for eligible administrative and planning expenses related to the Tribal HUD-VASH program, including start-up costs. HUD calculates administrative fees by total units awarded multiplied by \$111 (or current inflation-adjusted fee) multiplied by 12 months.

Subject to the availability of funds in future appropriations, successful applicants will receive annual renewal grants in accordance with the latest Renewal Notice (for example, <u>PIH 2024-13</u>), except that renewals for grants with longer periods of performance will only begin after the recipient has begun leasing its Tribal HUD-VASH project.

4. ELIGIBILITY.

A. Eligible Applicants.

Eligible applicants are Indian tribes as defined in section 4(13) of the Native American Housing Assistance and Self-Determination Act of 1996 (NAHASDA) and TDHEs authorized by one or more Indian tribes pursuant to section 4(22) of NAHASDA that have ever been allocated formula funding. Applications submitted by a TDHE on behalf of an Indian tribe(s) must include a Tribal resolution(s) or Tribal certification(s) on official letterhead authorizing the TDHE to apply on behalf of the Indian tribe(s). Applicants proposing consortiums and subrecipient arrangements must provide a Tribal resolution(s) or Tribal certification(s) on official letterhead supporting the proposed project from each participating tribe.

The U.S. Department of Veterans Affairs (VA) must be able to provide case management services to eligible Veterans within the service area(s) of the applicant, subrecipient(s) and/or consortiums.

B. Consortiums and Subrecipients.

Based on Tribal feedback received, HUD encourages interested Indian tribes to consider whether they would like to apply directly as a grantee, or alternatively, whether they would like to apply as a consortium. For purposes of this Notice, a consortium is a group of two or more tribes that jointly apply to the Tribal HUD-VASH program for one grant to serve eligible Veterans residing in multiple Tribal communities within geographic proximity. A consortium must enter into an agreement that designates a single lead applicant, identifies other participating applicants, outlines their joint arrangement, and complies with the requirements in 2 CFR 200.331 through 200.333 (including each

tribe's assurance of compliance with program requirements). A consortium's other participating applicants shall be subject to 2 CFR 200.331 through 333. A consortium's lead applicant must execute a grant agreement with HUD and act as a Tribal HUD-VASH grantee serving Veterans in all Tribal communities comprising the consortium.

Applicants may also propose sub-granting to eligible Indian tribes or TDHEs to serve multiple Indian tribes. Applicants proposing subrecipient(s) must enter into a subrecipient agreement or contract with the subrecipient(s). In addition to the requirements in 2 CFR 200.331 through 200.333, this agreement must contain the subrecipient's assurance of compliance with program requirements. HUD strongly encourages the lead applicant to ensure the proposed subrecipient(s) has sufficient capacity and is in good standing with HUD. Applicants interested in such arrangements will be eligible for only one grant award under this Notice.

C. Eligible Costs.

Tribal HUD-VASH grants awarded under this Notice can only be used for rental assistance and eligible administrative costs. See the <u>Consolidation Notice</u> for more information.

D. Cost Sharing, Matching and Leveraging.

You are not required to do cost sharing, mandatory matching or leveraging. You are encouraged to leverage other Federal (including Indian Community Development Block Grant, IHBG formula and IHBG Competitive funds) and non-Federal sources for capital costs (to construct or rehabilitate housing to support a Tribal HUD-VASH program), operating costs, or supportive services.

5. THRESHOLD REQUIREMENTS.

A. Existing Grantees Only.

Current Tribal HUD-VASH grantees must have an average Tribal HUD-VASH utilization rate of at least 70 percent over the 12-month period immediately preceding the Notice publication date to be eligible to apply. Utilization rate is the average number of units leased each month in the past 12 months divided by the total number of Tribal HUD-VASH units allocated for the 12-month period. If you are uncertain whether you meet this threshold criteria or need assistance calculating your utilization rate, contact TribalHUDVASH@hud.gov. HUD will use VA data to verify your reported utilization rate.

B. Civil Rights.

You must resolve all outstanding civil rights matters before the application submission deadline. Applicants with unresolved civil rights matters at the application deadline are ineligible. Applications from ineligible applicants will not receive HUD funding.

6. PROGRAM REQUIREMENTS.

In addition to the requirements set forth in the 2018 Consolidation Notice, HUD has established the following requirements for applications under this Notice.

Note that the general administrative and eligibility requirements for fiscal year 2025 are posted on the <u>HUD Policies and Regulations website</u>. To receive an award, you must adhere to the applicable requirements at the time of application. You must also adhere to the applicable requirements for the life of any award to remain eligible for the award.

A. Minimum/Maximum Award Information.

There is no minimum or maximum number of units an applicant may request under this Notice. However, the VA must be able to support your program proposal with case management services, as indicated by a VA commitment of support included in your application.

B. Use of Formula Current Assisted Stock.

As established in ONAP Program Guidance "IHBG in the Tribal HUD-VASH Program" (No. 2018-01, published February 21, 2018), Formula Current Assisted Stock (FCAS) units can be used to house Tribal HUD-VASH Veterans. You may choose to use FCAS units in order to have enough housing stock to support a Tribal HUD-VASH program. However, HUD will not be counting these units in the IHBG recipient's FCAS formula count during the period that assisted Veterans are housed in these units, unless otherwise provided by HUD.

C. New Housing Construction and Substantial Rehabilitation.

HUD acknowledges that Tribal areas often have limited housing stock. Therefore, HUD will consider applications that propose to use other federal or non-federal funding to construct, rehabilitate, or acquire units that will later use Tribal-HUD VASH rental assistance. Such Tribal HUD-VASH grants will be conditioned on, at a minimum, the successful commitment of funding for the proposed construction, rehabilitation or acquisition within three years of grant award. If you do not provide HUD with evidence of firm commitment of funding within three years of grant award, HUD may rescind the grant and recapture grant funds. Successful applicants can only use Tribal HUD-VASH grants awarded under this Notice for rental assistance and administrative costs.

7. EXPANSION APPLICATION CONTENTS AND SUBMISSION.

You must apply through grants.gov by the deadline specified in Section 2. HUD will not consider applications received after the deadline. See Section 9, Selection and Award Process, for more information on how HUD will consider applications.

You must be registered in the System for Award Management (<u>SAM.gov</u>) and you must continue to maintain an active registration in <u>SAM.gov</u> with current information at all times

during which you have an active Federal award or an application or plan under consideration by a Federal agency.

To register, go to <u>SAM.gov Entity Registration</u> and click Get Started. From the same page, you can also click on the Entity Registration Checklist for the information you will need to register. It can take several weeks to register in <u>SAM.gov</u>, so please get started now if you are planning to apply. <u>SAM.gov</u> also provides each organization with a unique entity identifier (UEI). You must have a valid UEI to apply for funding.

You must have an active <u>Grants.gov</u> registration. This requires a <u>Login.gov</u> registration as well. See step-by-step instructions at the Grants.gov <u>Quick Start Guide for Applicants</u>. You must apply for funding using Grants.gov, unless HUD has approved your waiver request.

If you cannot submit your application electronically, contact <u>TribalHUDVASH@hud.gov</u> to request a waiver of this requirement. You must request a waiver at least 7 days before the application deadline and it must be for good cause (lack of SAM registration or valid UEI is not good cause). You must submit paper applications before the deadline.

Your application may be in the format of your choosing but must include the following information.

A. Narrative response that addresses each of the following:

i. One-page proposal summary.

Provide a one-page summary showing:

- a. Name of applicant and unique entity identifier (UEI number);
- b. Number of units requested and estimated bedroom size of these units;
- c. Type of proposed assistance: describe if your program will provide Tenant-Based or Project-Based Rental Assistance, or a combination;
- d. Housing supply: describe the availability of housing for the program;
- e. Brief description of new construction, rehabilitation or acquisition project, if applicable; and
- f. Brief description of proposed partnerships (e.g., subrecipients or consortiums), if applicable.

ii. Administrative capacity.

You must show to HUD's satisfaction sufficient administrative capacity to manage a Tribal HUD-VASH program. Describe the administrative capacity of the applicant or entity that will be administering the grant to support the program, including the knowledge and experience of key staff, including the program manager, who will implement the Tribal HUD-VASH program. Describe your familiarity with the program requirements found in the 2018 Consolidation

<u>Notice</u>. If proposing new housing construction or rehabilitation, describe the applicant's or project partners' experience with similar recent projects.

iii. Need.

You must show to HUD's satisfaction the presence of eligible homeless or at-risk Veterans in the area. Describe the need for housing among eligible Veterans in the area, including the estimated number of eligible homeless or at-risk Veterans. Provide supporting information verifying the presence of eligible Veterans who are homeless or at risk of homelessness in the area. Examples of acceptable documentation may include but are not limited to: Point-in-Time counts; waiting lists that include homeless Veterans or Veterans at risk of homelessness; a list of eligible Veterans from the Tribal Veteran's Representative; data from the local VA; and U.S. Census Bureau's American Community Survey (ACS) data (https://www.census.gov/programs-surveys/acs).

iv. Description of proposed Tribal HUD-VASH program.

You must provide a detailed description of your proposed program that shows a well-developed plan to implement the program, including:

- a. Number of Veterans you plan to serve under this grant;
- b. Availability of local housing;
- c. Type of units and their location;
- d. Unit sizes and HUD Fair Market Rent (FMR) rates for the units;
- e. Timeline for implementing the program, including policy development, staff training, coordination with VA and local landlords (if applicable) and achieving full lease-up;
- f. A project plan and timeline for completing new construction or rehabilitation, including planned funding sources (if applicable); and
- g. A description of how the Veterans will qualify for such housing [if proposing capital funding with income restrictions that differ from Tribal HUD-VASH income limits (such as Indian Community Development Block Grant or Low-Income Housing Tax Credit)].

B. VA Commitment of Support.

You must include a letter of support from your partnering VA medical facility's Director with your application. The VA's letter must affirm that the Indian tribe or TDHE has consulted with its local VA facility about its interest in expanding or creating a Tribal HUD-VASH program and that the VA commits to providing case management services for eligible Veterans, should the applicant succeed in receiving a Tribal HUD-VASH expansion award. Information regarding Local VA facility information and Local VA Homeless Program Coordinators is available online at: https://www.va.gov/find-locations and https://www.va.gov/homeless/.

C. Tribal Resolution.

As stated above, applications submitted by a TDHE on behalf of an Indian tribe(s) must include a Tribal resolution(s) or Tribal certification(s) on official letterhead authorizing the TDHE to apply on behalf of the Indian tribe(s). Applicants proposing consortiums and subrecipient arrangements must provide a Tribal resolution(s) or Tribal certification(s) on official letterhead supporting the proposed project from each participating tribe.

8. REVIEW AND CORRECTIONS TO APPLICATION ERRORS.

You must meet the threshold requirement discussed in Section 5.B. Current Tribal-HUD VASH grantees must also meet the threshold requirement at 5.A. If you do not meet the applicable threshold requirement(s), HUD will not review your application for funding.

If HUD finds a technical error, area of concern, or a need for more information about your application, HUD will contact you and request a cure or additional information. This may include additional information about the items requested by this Notice or other information as determined by HUD. The applicant must provide a response in accordance with the instructions and the timeline contained in the deficiency notification. If you do not respond timely or you do not provide the information requested, you will not be awarded funds under this Notice.

HUD will work with you to ensure that the number of units you are requesting correlates with the Veteran need in the area, your administrative capacity, the housing units available in the area, and the ability of VA to provide services to that number of Veterans.

If after review HUD determines that you do not have sufficient housing stock available, or if the VA cannot support your application, HUD may award you a lower amount than requested or you may not be awarded funds under this Notice.

9. SELECTION AND AWARD PROCESS.

HUD will select applicants based on the criteria described here and in the sections above. The 2017 Appropriations Act requires HUD to make awards based on need and administrative capacity. Accordingly, HUD will select applicants based on severity of need (how greatly the number of eligible Veterans exceeds the number of rental assistance units requested), and availability of housing (or feasibility of the applicant's proposal to secure or construct units for the program).

HUD will notify all applicants about the outcome of their application via email.

Upon HUD's approval of the award package, HUD will issue a grant agreement electronically to the applicant for a signature. The grant agreement is the official document that obligates funds. HUD will disburse funds through the HUD Line of Credit Control System (LOCCS).

10. RISK EVALUATION.

HUD may deny an award if HUD determines that the applicant does not have adequate administrative capacity to administer the grant. In accordance with 2 CFR § 200.206, HUD will consider risk and administrative capacity before making awards. Before making an award, HUD will determine if you have handled any past federal awards well and demonstrated sound business practices. As part of that review, HUD uses SAM.gov and Department of Treasury data. HUD will examine a range of capacity indicators, including program performance, compliance with reporting requirements, outstanding financial audits, unresolved HUD monitoring findings, Voluntary Compliance Agreements, HUD Notices of Intent and/or Intent to Impose Remedies, Office of Inspector General findings or audit findings, unresolved outstanding civil rights violations, high unexpended grant balances, compliance with mitigation plans, and overall administrative capacity to administer the Tribal HUD-VASH program.

11. REPORTING.

Successful applicants will be subject to the reporting requirements in Section VI.O of the Consolidation Notice and the terms and conditions of the grant award.

12. GENERAL TRIBAL HUD-VASH RESOURCES.

- **A.** Office of Native American Programs Tribal HUD-VASH website: https://www.hud.gov/program offices/public indian housing/ih/tribalhudvash.
- **B.** 2 CFR Part 200, "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards": https://www.ecfr.gov/current/title-2/part-200.
- **C.** Fair Market Rent information: Fair Market Rents (40th PERCENTILE RENTS) | HUD USER.

13. PAPERWORK REDUCTION ACT.

The Office of Management and Budget (OMB) approves the information collection requirements contained in this notice under the Paperwork Reduction Act (PRA) of 1995 (44 U.S.C. 3501 et. Seq.). In accordance with the PRA, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number. The Office of Management and Budget (OMB) approved the active information collections contained in this notice under the PRA OMB Control Number 2577-0169 with an expiration date of 4/26/2026.

If you have questions about the Tribal HUD-VASH grant expansion process, please contact the Tribal HUD-VASH program at TribalHUDVASH@hud.gov.

Richard J. Monocchio

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Public and Indian Housing