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## Reimbursement of Costs

- IHBG-CARES grants may cover or reimburse any eligible and allowable costs
  - paid by the IHBG recipient with other non-Federal fundsand
  - dating from January 21, 2020 and later
    - CDC date for pandemic onset in the US
- **Section 3** of the Abbreviated IHP/APR identifies the date recipient began preparing for COVID-19
- There should be a program in the Abbreviated IHP/APR specific to reimbursement costs
- **Unique Identifier (Line 1 of Section 3)** must be titled COVID-19 reimbursement costs
- Recipients should maintain:
  - start date documentation
  - documentation to support any costs the recipient plans to reimburse with grant funding




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## Use of FY 2020 IHBG for COVID-19


- Only IHBG funds allocated for FY2020 are subject to the additional flexibilities under the waivers/alternative requirements
  - Recipient must notify the Area ONAP that they are going to use FY2020 funds for COVID-19 purposes, and how much they want to reprogram
  - Area ONAP picks the identified amount of FY2020 funds and moves it to the new COVID-19 BLI
  - Area ONAP reprograms the funds, then recipient can submit IHP amendment

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## Abbreviated IHP/APR Form

- Abbreviated IHP/APR
  - Modified version of the regular IHP/APR
  - Requesting less information
  - Amended certain data fields
  - Fillable PDF (will not be in EPIC)
- Abbreviated Indian Housing Plan (IHP):
  - how the IHBG recipient will carry out activities or projects that meet the requirements of the CARES Act
- If no FY 2020 IHP submitted: submit Abbreviated IHP
  - may be required to submit additional information



## Abbreviated IHP Review

- Determine if Abbreviated IHP complies with the CARES Act and NAHASDA
- **AS QUICKLY AS POSSIBLE**
- **No more than 15 days** after receipt of a complete Abbreviated IHP
- If IHP is noncompliant
  - Request recipient revise and resubmit ASAP
  - Provide technical assistance to modify Abbreviated IHP, as appropriate
    - Ensure compliance with the CARES Act
- Abbreviated IHP may be amended to adjust any planned eligible activities or programs
  - provided such activities or programs are eligible.



## Grant Agreement and Award Letter

- Abbreviated IHP is found in compliance
- Send recipient an award letter and grant agreement package to sign and return
- Award letter template
- Grant agreement package
  - Grant Agreement
  - Grant Addendum
  - Grant Terms and Conditions
- All documents are in electronic format
- Grant agreement can be signed, scanned, and sent back to ONAP electronically
- Recipient should maintain all documents with wet signatures in their records
- Funds available in LOCCS once the fully executed grant agreement is returned and processed by HUD

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## Use of Existing IHBG Formula Funding

- FY 2020 IHBG funds may be used immediately and subject to waiver flexibilities.
- PIH Notice 2020-06 (IHBG-CARES Implementation Notice) describes how to reprogram FY 2020 IHBG funds
  - prevent, prepare for, and respond to COVID-19
  - including maintaining normal operations during the period that the IHBG program is impacted by COVID-19



## FY 2020 IHP Amendment

IHP Amendment in EPIC or the PDF includes one or more programs that include:

- **Unique Identifier (Line 1a (EPIC) or Line 1 (PDF) of Section 3):** The Unique Identifier must be
  - COVID-19 Prevention
  - COVID-19 Preparation and/or
  - COVID-19 Response
- **Families to Be Served (Line 6 of Section 3):** A separate program must be included for each type of family being served
  - Low-Income Native American Families
  - Non Low-Income Native American Families or Non-Native Families.

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## Reporting Requirements

- **Quarterly Federal Financial Reports (SF-425)**
  - account for the receipt and disbursement of grant funding
  - IHBG CARES will be reported cumulatively for the life of the grant
- **Abbreviated Annual Performance Report (APR) (Form: HUD-52735)**
  - information regarding recipient expenditure of grant funding
  - separate from IHBG Formula APR
  - covers the recipient's typical reporting period
  - due to Area ONAP within 90 days of the end of the recipient's program year unless otherwise specified
- **Additional CARES Act Reporting:** Recipients of \$150,000 or more in IHBG-CARES funding must submit a soon to be developed OMB form
  - amount of funds received
  - amount of funds obligated or expended for each project or activity
  - detailed list of all such projects or activities, including a description of the project or activity
  - detailed information on any subcontracts or subgrants awarded by the recipient.
- Data to be reported is identified on the following slides and are subject to change as COVID-19 evolves



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## Reporting Requirements

- **Abbreviated APR (continued)**
- **(1)** Total amount of IHBG-CARES grant funding received from HUD.
- **(2)** Total amount of IHBG-CARES grant funding that was expended or obligated during the tribal program year to:
  - **(a)** prevent COVID-19
  - **(b)** prepare for COVID-19; or
  - **(c)** respond to COVID-19
- **(3)** List of all activities for which IHBG-CARES grant funds were expended or obligated under each of the above eligible purpose categories, including:
  - **(a)** the type of the activity;
  - **(b)** a description of the activity, including whether the activity is:
    - **(i)** eligible under the IHBG program; or
    - **(ii)** an eligible activity pursuant to a waivers and alternative requirement set forth in PIH Notice XXXXX related to prevention, preparation for, and response to COVID-19.



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## Reporting Requirements

- **Abbreviated APR (continued)**
- **(c)** an explanation of how the activity addresses one or more of the eligible purposes identified in (2), above;
- **(d)** an evaluation of the completion status of the activity;
- **(e)** an estimate of the number of eligible families that were assisted by this activity, including the number of low-income Indian families, non-low-income Indian families, and non-Indian families that were assisted by the activity; and
- **(f)** the name of the person to contact at the Tribe or TDHE if there are concerns with or questions about the activity.

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## General COVID-19 Resources

- ONAP COVID-19 Recovery Programs website: [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/ih/Covid Recovery](https://www.hud.gov/program_offices/public_indian_housing/ih/Covid_Recovery)
- IHBG-CARES Waivers and Alternative Requirements, PIH Notice 2020-05
- IHBG-CARES Implementation Notice, PIH Notice 2020-06
- ONAP website, including updated COVID-19 related Frequently Asked Questions: <https://www.hud.gov/codetalk>
- HUD COVID Resources and Fact Sheets: <https://www.hud.gov/coronavirus>