



No. 2018-01

PROGRAM GUIDANCE

PROGRAM: Tribal HUD-VA Supportive Housing (Tribal HUD-VASH) Program

FOR: Tribal/TDHE HUD-VA Supportive Housing Recipients

FROM: Heidi J. Frechette, Deputy Assistant Secretary for Native American Programs, PN *Heidi J. Frechette*

TOPIC: IHBG in the Tribal HUD-VASH Program

Purpose: This notice provides additional guidance to Tribal HUD-VA Supportive Housing program (Tribal HUD-VASH) recipients on the use of Formula Current Assisted Stock (FCAS) units and the use of Indian Housing Block Grant (IHBG) funds for rental assistance in the Tribal HUD-VASH program.

Program Description: The purpose of the Tribal HUD-VASH program is to provide 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.

Background: HUD published the *Tribal HUD-VASH Frequently Asked Questions (FAQs) Part III* to assist with the implementation of the Tribal HUD-VASH program. The FAQs provided information concerning the utilization of FCAS units and the use of IHBG funds for the program. HUD is taking the additional step to further disseminate this information in an official ONAP Program Guidance.

Because of differing requirements in the Tribal HUD-VASH and the IHBG programs, FCAS units can only be used to house Tribal HUD-VASH veterans in limited circumstances. A recipient can use low-rent FCAS units to house veterans if they comply with the process outlined in this program guidance. Additionally, differing Tribal HUD-VASH and IHBG program requirements means that the use of IHBG funds to support a recipient's Tribal HUD-VASH is very limited.

FCAS units: A recipient who wants to use FCAS units to house Tribal HUD-VASH program veterans can only do so if the FCAS units are not being counted in the recipient's IHBG FCAS formula count. Tribal HUD-VASH recipients that want to use low-rent FCAS units must provide written notification to the IHBG Formula Customer Service Center to remove the FCAS unit(s) from their IHBG FCAS formula count. Vacant Mutual Help units may be converted to low-rent units in accordance with 24 CFR 1000.316, and used after the low-rent units are removed from the tribe/TDHE's IHBG FCAS formula count.

When the former FCAS units are no longer being operated as Tribal HUD-VASH units, the units will no longer be considered Tribal HUD-VASH units, and can be added back to the Tribe/TDHE's FCAS formula count. The tribe/TDHE must provide written notification to the IHBG Formula Customer Service Center to add the units back to their IHBG FCAS formula count. Units may also be reported on the annual Formula Response Form.

IHBG Funding: The Federal Register notice, *Implementation of the Tribal HUD-VASH program* (80 Fed. Reg. 63822, October 21, 2015), states that IHBG funds may be used to cover any "additional" costs related to housing Native American veterans and their families under the Tribal HUD-VASH program. However, due to differing requirements for IHBG funds and Tribal HUD-VASH funds, there are very limited circumstances where IHBG funds may be used for the Tribal HUD-VASH program. IHBG funds are not allowed to cover rental costs, security deposits, utilities, or administration costs for the Tribal HUD-VASH program. Additionally, IHBG funds may not be used to operate or maintain Tribal HUD-VASH units. If a recipient identifies costs that may be eligible expenditures for both programs and does not create a conflict between existing requirements, the recipient must request prior written approval from HUD before IHBG funds can be used for the Tribal HUD-VASH program. The Department will review all requests on a case-by-case basis to ensure funds are used in accordance with all requirements.

Questions or For Further Information: If you have any questions regarding this guidance, please contact Office of Native American Programs Grants Management Director, Frederick Grierfer, at 202-402-5186.