

Small Tribes Task Force

Proposal 1 (Submitted by Nevada-Cal)

October, 2002

FOR DISCUSSION PURPOSES ONLY

California Nevada Indian Housing Association Base Funding Proposal

The minimum allocation in any year to a recipient under the needs component of the NAHASDA appropriation allocation formula shall equal .05% of the total appropriation for that year.

As an example, based on an estimated appropriation in fiscal year 2003 of \$632,383,000, the minimum allocation to any recipient of NAHASDA funds under the needs component of the funding formula would equal approximately \$317,000.

This allocation under the needs component of the funding formula would be available to any federally recognized Indian tribe who qualifies for an IHBG under NAHASDA.

Small Tribes Task Force

Proposal 2 (Submitted by Utah Paiute)

October, 2002

FOR DISCUSSION PURPOSES ONLY

Proposed Native American Housing Assistance And Self-Determination Act Supplemental Grant Program

NAHASDA Indian Housing Block Grants (IHBG) are allocated based on local need and the amount of current assisted stock. Because of limited federal appropriations, basing tribal allocations on only these factors results in certain special small tribes and Native Alaskan village needs not being met. Because of their small populations some small tribes and villages assert that they receive funding under IHBGs that is not enough to establish housing assistance programs. The NAHASDA Supplemental Grant (SG) Program therefore provides additional grants to qualifying NAHASDA IHBG eligible tribes and villages.

Supplemental Grants are designed to be combined with IHBGs and other federal, state and private money. By using Supplemental Grants and leveraging this and IHBG money, small tribes and villages that have commitment and capacity can create and operate housing assistance programs. Supplemental Grants can be used to fund administration, conduct planning, act as seed money and finance programs.

Only those federally recognized tribes and villages that operate individual programs that receive less than \$125,000 in IHBG funding in a single year, or who are members of a regional housing entity that collectively receive less than \$125,000 in IHBG funding, are eligible for Supplemental Grants. SGs will be given out for one or two year periods and no single grant shall exceed \$75,000.

Supplemental Grants are not an entitlement. Though individual applications are required, the application form and procedure are simple and do not require employment of a consultant or grantsman. Applications are to be submitted at the same time Indian Housing Plans are filed. Selection will be made pursuant to a competitive award process administered by the U.S. Department of Housing and Urban Development's National Office of Native American Programs (HUD). All applicants must demonstrate 1) need and 2) capacity equal to or in excess of the grant amount level being requested. Tribes and HUD will jointly determine what standards will be used to award these Grants.

Supplemental Grants are not restricted to constructing and operating housing and may be used by tribes and villages in a variety of ways to improve housing conditions in their formula areas. Most NAHASDA procedures and rules apply.

\$7.5 million will be set aside from NAHASDA Block Grant Funds for Supplemental Grants for FFY 2004. This replaces the \$50,000 and \$25,000 minimum IHBG funding that has existed since the inception of NAHASDA. The non-reallocated portion of Supplemental Grants to IHBG funding for FFY 2004 shall be maintained in the future as annual NAHASDA and IHBG appropriations change.

Small Tribes Task Force

Proposal 3 (Submitted by Utah Paiute)

October, 2002

FOR DISCUSSION PURPOSES ONLY

Proposed Native American Housing Assistance And Self-Determination Act Supplemental Grant Program

NAHASDA Indian Housing Block Grants (IHBG) are allocated based on local need and the amount of current assisted stock. Because of limited federal appropriations, basing tribal allocations on only these factors results in certain special small tribes' needs not being met. Because of their small populations some small tribes assert that they receive funding under IHBGs that is not enough to establish housing assistance programs. The NAHASDA Supplemental Grant (SG) Program therefore provides additional grants to qualifying NAHASDA IHBG eligible tribes.

Supplemental Grants are designed to be combined with IHBGs and other federal, state and private money. By using Supplemental Grants and leveraging this and IHBG money, small tribes that have commitment and capacity can create and operate housing assistance programs. Supplemental Grants can be used to fund administration, conduct planning, act as seed money and finance programs.

Tribes seeking Supplemental Grants must make an election in their Indian Housing Plans requesting the Grants and make an additional showing. When awarded the Grant, they shall receive funding that, when combined with their IHBG, does not exceed in total \$100,000. Only those federally recognized tribes and villages that operate individual programs that receive less than \$100,000 in IHBG funding in a single year, or who are members of a regional housing entity that collectively receive less than \$100,000 in IHBG funding, are eligible for Supplemental Grants.

Supplemental Grants are not an entitlement. All tribes seeking Supplemental Grants must make a specific showing in their Indian Housing Plans of 1) need and 2) capacity equal to or in excess of the

grant amount level being requested. This will be done using a special page added to the Plans for this purpose. Tribes and HUD will jointly determine what standards will be used to award these Grants.

Supplemental Grants are not restricted to constructing and operating housing and may be used by tribes in a variety of ways to improve housing conditions in their formula areas. Most NAHASDA procedures and rules apply.

\$7.5 million will be set aside from NAHASDA Block Grant Funds for Supplemental Grants for FFY 2004 along with reallocated unused formula money from the previous year. This replaces the \$50,000 and \$25,000 minimum IHBG funding that has existed since the inception of NAHASDA. The non-reallocated portion of Supplemental Grants to IHBG funding for FFY 2004 shall be maintained in the future as annual NAHASDA and IHBG appropriations change.

Small Tribes Task Force

Proposal 4

(Submitted by Aquinnah Wampanoag)

October, 2002

FOR DISCUSSION PURPOSES ONLY

Proposed Native American Housing Assistance And Self-Determination Act Supplemental Grant Program

The NAHASDA Formula allocated \$50,000 in the first year for a new tribe to set up a housing department or a TDHE. In the second year the formula provides \$25,000 for on going administration. This allocation was not fair funding to the new tribes to enter into the NAHASDA funding process. There was sentiment at the time of the establishment of the original committee that new tribes were not to benefit from the NAHASDA allocation. It was believe that the funds for new tribes should come from other sources.

It is apparent that there is not sufficient funding available from other sources to provide for the needs of the new tribes to provide safe decent and sanitary living conditions for their tribal members living in (or desiring to live in) their designated tribal area with the funds provided for the ensuing years (2-5).

Therefore, a supplemental funding must be provided for these tribes to achieve their mission of providing housing for their members. This proposal is an attempt to meet the needs of these new tribes (federally and state recognized tribes as defined in NAHASDA).

A tribe (or TDHE) must in the first year set up a housing entity. During the first year they must create policies that comply with NAHASDA, create a working plan for the next four years that commits to the type of programs that they intend to administer. These programs could include but are not limited to creating low rent housing, mutual help housing, mortgage assistance, rehab of units owned by tribal members or the tribe, tax credits or a title IV program. Then the entity may submit an IHP (one and five year plan) to HUD where there will be a box indicating that they are intending to apply for funding under their needs component in that plan.

HUD must then approve the policies and the IHP to be sure that they comply with NAHASDA.

Technical assistance to achieve this goal may be received from either HUD or NAIHC. HUD must review this plan with the same diligence that they use with tribes who are already receiving block grants under NAHASDA. The plan can provide for the development of 1 new house in the first year, or the rehab or no more than ?? houses or funding for other NAHASDA approved programs. The grant allocation under the need component cannot exceed the TDC for the designated tribal area.

HUD will do everything in their power to ensure that Indian Health Service funding can become available to provide funds under the Sanitation Facilities Construction program to provide for water and wastewater facilities.

When the units are completed (new development or rental) funds will be provided under the FCAS component of the formula to ensure the maintenance of the tribally owned units.

No further IHPs for development or rehabilitation will be approved until such time as the first year's plan units are completed and occupied.

Funding for this component of NAHASDA can be funded with funds that are not distributed from the previous year(s), and recaptured funds. These funds will be set-aside for IHPs submitted each year by new tribes. If the funds are not requested in any fiscal year they will then be distributed according to the formula to all tribes the following year.

Small Tribes Task Force

Proposal 5 (Amended by Alaska Region)

October, 2002

FOR DISCUSSION PURPOSES ONLY

Proposed Native American Housing Assistance And Self-Determination Act Supplemental Grant Program

NAHASDA Indian Housing Block Grants (IHBG) are allocated based on local need and the amount of current assisted stock. Because of limited federal appropriations, basing tribal allocations on only these factors results in certain special small tribes' needs not being met. Because of their small populations some small tribes assert that they receive funding under IHBGs that is not enough to establish housing assistance programs. The NAHASDA Supplemental Grant (SG) Program therefore provides additional grants to qualifying NAHASDA IHBG eligible tribes.

Supplemental Grants are designed to be combined with IHBGs and other federal, state and private money. By using Supplemental Grants and leveraging this and IHBG money, small tribes that have commitment and capacity can create and operate housing assistance programs. Supplemental Grants can be used to fund administration, conduct planning, act as seed money and finance programs.

Tribes seeking Supplemental Grants must make an election in their Indian Housing Plans requesting the Grants and make an additional showing. When awarded the Grant, they shall receive funding that, when combined with their IHBG, does not exceed in total \$100,000. Only those federally recognized tribes and villages that operate individual programs that receive less than \$100,000 in IHBG

funding in a single year, ~~or who are members of a regional housing entity that collectively receive less than \$100,000 in IHBG funding, are eligible for Supplemental Grants.~~

Supplemental Grants are not an entitlement. All tribes seeking Supplemental Grants must make a specific showing in their Indian Housing Plans of 1) need and 2) capacity equal to or in excess of the grant amount level being requested. This will be done using a special page added to the Plans for this purpose. Tribes and HUD will jointly determine what standards will be used to award these Grants.

Supplemental Grants are not restricted to constructing and operating housing and may be used by tribes in a variety of ways to improve housing conditions in their formula areas. Most NAHASDA procedures and rules apply.

\$7.5 million will be set aside from NAHASDA Block Grant Funds for Supplemental Grants for FY 2004. This replaces the \$50,000 and \$25,000 minimum IHBG funding that has existed since the inception of NAHASDA. The non-reallocated portion of Supplemental Grants to IHBG funding for FY 2004 shall be maintained in the future as annual NAHASDA and IHBG appropriations change.

Small Tribes Task Force

Proposal 6

(Submitted by the Association of Alaska Housing Authorities)

October, 2002

FOR DISCUSSION PURPOSES ONLY

Proposal to Increase the Administrative Percentage to Assist Small Tribes in the Development of Administrative Capacity

The current percentage rate of 20% allowable administrative charge is insufficient for small tribes to build capacity. At the minimum funding rate of \$25,000, a small tribe is allowed only \$5,000 annually to administer the NAHASDA program.

Proposal:

The following increase in Allowable Administrative Charge(s) would greatly assist the smaller tribes in the delivery of the NAHASDA program:

- Any tribe receiving \$200,000 or less may use up to 50% of their NAHASDA Needs funds for Administration
- Any tribe receiving \$100,000 or less may use up to 80% of their NAHASDA Needs funds for Administration
- Any tribe receiving \$25,000 or less may use up to 100% of their NAHASDA Needs funds for Administration

Small Tribes Task Force

Proposal 7

(Submitted by Fort Bidwell Tribe, Walker River Indian Housing Authority
and the Owens Valley Indian Housing Authority)

November, 2002

FOR DISCUSSION PURPOSES ONLY

Base Funding Proposal

The minimum allocation in any year to a recipient under the needs component of the NAHASDA appropriation allocation formula shall equal .05% of the total appropriation for that year; provided, however, that no single grant shall exceed 10% of the total appropriation for that year.

As an example, based on an estimated appropriation in fiscal year 2003 of \$632,383,000, the minimum allocation to any recipient of NAHASDA funds under the needs component of the funding formula would equal approximately \$317,000; and no single grant would exceed \$63,238,300.

This allocation under the needs component of the funding formula would be available to any federally recognized Indian tribe who qualifies for an IHBG under NAHASDA.