

# Tribal HUD VASH Expansion NOFA Training

Rating Factor 3:  
Capacity to Administer the  
Program Part 1





# Rating Factor 3

## Capacity to Administer the Program

2

Maximum total 50 points

<b>Rating Factor</b>	<b>Factor Title</b>	<b>Points</b>
<b>Rating Factor 3</b>	<b>CAPACITY TO ADMINISTER THE PROGRAM (Minimum of 35 points to meet threshold)</b>	<b>50</b>
<b>Subfactor 3.1</b>	<b>Implementation Plan and Schedule</b>	<b>10</b>
<b>Subfactor 3.2</b>	<b>Availability of Housing Stock</b>	<b>10</b>
<b>Subfactor 3.3</b>	<b>Budget</b>	<b>10</b>
<b>Subfactor 3.4</b>	<b>Coordination with Department of Veterans Affairs</b>	<b>10</b>
<b>Subfactor 3.5</b>	<b>Coordination with Partners</b>	<b>5</b>
<b>Subfactor 3.6</b>	<b>Outputs and Outcomes</b>	<b>5</b>
	<b>TOTAL POINTS (Minimum of 35 points needed to meet threshold requirement)</b>	<b>50</b>

**Subfactor 3.1 – Implementation Plan and Schedule**  
**Subfactor 3.2 – Availability of Housing Stock**  
**Subfactor 3.3 - Budget**  
**(total up to 30 points)**



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## **Subfactor 3.1 – Implementation Plan and Schedule (up to 10 points)**

## Subfactor 3.1- Implementation Plan and Schedule

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- ▶ HUD will assess the applicant's administrative capacity to implement its proposed Tribal HUD-VASH program by reviewing its workplan narrative.
- ▶ The applicant must include a schedule of specific tasks in its Implementation Schedule.
- ▶ The applicant must describe the program in detail and include the following components in its workplan narrative and Implementation Schedule. (Please view following slide(s))

## Subfactor 3.1- Implementation Plan and Schedule

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### 1) Type of Tribal HUD-VASH Assistance: Tenant-Based vs. Project-Based.

- Applicant must describe its rationale for requesting Tenant-Based Rental Assistance and/or Project-Based Rental Assistance.
- Rationale must correlate with the need discussed in Rating Factor 2, Need.

### 2) Units of Assistance Requested.

- Workplan narrative must include a justification for the total number of rental housing units that the Tribe or TDHE plans to provide.
- Justification must correlate with the information submitted under Rating Factor 2, Need, and criteria established in this NOFA, and must address housing availability.
- Number of units requested in the justification must match the information provided on the Units of Assistance Table(s) submitted with the application.

## Subfactor 3.1- Implementation Plan and Schedule

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**3) Location of the units** where eligible Veterans may be housed (e.g., include a map, address and/or aerial photo).

**4) If applicable, description** of how the applicant plans to operate and maintain any units owned or operated by the applicant.



## Subfactor 3.1- Implementation Plan and Schedule

➔ Applicant proposing **Project-Based Rental Assistance** must also address the following components in its workplan narrative.

## Subfactor 3.1- Implementation Plan and Schedule

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### Project-Based Rental Assistance:

#### 5) Housing Stock.

- Description of whether the applicant plans to leverage other resources to construct, acquire, or rehabilitate housing stock for the use of eligible Veterans.
- If the applicant is not planning to increase its housing stock and is instead using its existing stock, then the applicant must describe what type of units it plans to use (e.g. IHBG, FCAS, Title VI, Low-Income Housing Tax Credit, Section 184, tribal, etc.) and identify the age of the stock as of the application deadline established in this NOFA
- Applicants that propose to use existing housing stock to house Veterans will not be awarded the maximum points under Subfactor 3.2 below, unless it is newly constructed or acquired for Veterans 12 months or less prior to the application deadline established in this NOFA (April 15, 2021)

## Subfactor 3.1- Implementation Plan and Schedule

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### Project-Based Rental Assistance:

#### 6) Length of time the Tribal HUD-VASH assistance.

- Length of time the Tribal HUD-VASH assistance would not be used while waiting for the units to be completed (e.g. constructed, acquired, or rehabilitated)
- What activities the applicant will continue to implement during this time.
- Projects with new construction timeframes longer than two years will not be approved;

#### 7) Number of units

- Number of units and the type of structure to which the assistance units will be attached.

#### 8) Project Ownership and Site Control.

- Project-Based Rental Assistance may be provided to privately owned housing with a contract with the owner of the housing.
- Unit that is owned or operated by the tribe/TDHE.

## Subfactor 3.1- Implementation Plan and Schedule

Scoring Criteria	Points
<ul style="list-style-type: none"><li>• Workplan narrative and Implementation Schedule include <b>all</b> components outlined in Subfactor</li><li>• Including <b>components #5-8</b> if the applicant is proposing Project-Based Rental Assistance</li></ul>	<b>10 points</b>
<ul style="list-style-type: none"><li>• <b>One</b> of the following below will apply:</li><li>• Workplan narrative and Implementation Schedule are either <b>missing one component</b> outlined in Subfactor; including components #5-8 if the applicant is proposing Project-Based Rental Assistance</li></ul> <p><b>OR</b></p> <ul style="list-style-type: none"><li>• Plan addressed all required components but <b>lacked</b> detail to warrant full points under this Subfactor</li></ul>	<b>7 points</b>

### Subfactor 3.1- Implementation Plan and Schedule

Scoring Criteria	Points
<ul style="list-style-type: none"><li>Applicant is requesting the majority of funds towards Project-Based Rental Assistance and workplan narrative and Implementation Schedule are <b>missing more than one but less than five components</b> outlined in this Subfactor</li></ul>	<b>5 points</b>
<ul style="list-style-type: none"><li>Applicant is either requesting the <b>majority of funds towards Project-Based Rental Assistance</b> and the workplan narrative and Implementation Schedule are <b>missing five or more components</b> outlined in Subfactor</li></ul> <p><b>OR</b></p> <ul style="list-style-type: none"><li>Applicant is requesting the <b>majority of funds towards Tenant-Based Rental Assistance</b> and workplan narrative and Implementation Schedule are <b>missing two or more components outlined in Subfactor.</b></li></ul>	<b>0 points</b>

## **Subfactor 3.2- Availability of Stock (up to 10 points)**

## Subfactor 3.2- Availability of Stock

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- ➔ Additional Tribal HUD-VASH expansion funding will provide an opportunity to address severe overcrowding and the lack of affordable housing in Indian County.
- ➔ HUD will award full points under this Subfactor to applicants that demonstrate the administrative capacity to increase their housing stock for eligible Veterans.
- ➔ HUD will award points based on how the applicant addresses the availability of housing stock it would use to house eligible Veterans under the Tribal HUDVASH program.
- ➔ Applicants will be rated under either **Category #1 (Project-Based Rental Assistance)** or **Category #2 (Tenant-Based Rental Assistance)**, depending on the nature of the proposed project.

## Subfactor 3.2- Availability of Stock

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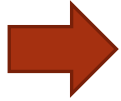
- ➔ Applicants that propose both Project-Based and Tenant-Based projects will be rated according to the project that constitutes the majority of the federal request amount listed on the SF-424 and detailed budget
- ➔ Applicants that propose an equal amount of federal funds towards both Project-Based and Tenant-Based projects will be rated according to Category #1- Project-Based Rental Assistance
- ➔ Keeping with HUD's priority to increase the number of new housing units available for eligible Veterans under the program.



## Subfactor 3.2- Availability of Stock

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### Category #1: Project-Based Rental Assistance



Maximum points will be awarded to those that have leveraged **other funding sources** to increase its housing stock for the use of eligible Veterans.



To qualify for full points, applicants proposing to increase its housing stock for eligible Veterans must identify the amount of leveraged funding sources that it has used or plans to use and provide firm commitment documentation supporting this amount.

## Subfactor 3.2- Availability of Stock

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### Category #1: Project-Based Rental Assistance

- **Firm Commitment** (page 37 of the Tribal HUD VASH Program NOFA)
  - Letter of commitment, Memorandum of Understanding (MOU), or Agreement,
  - Applicant's partner specifying that it agrees to perform and/or support an activity specified in the application.
  - Demonstrate that the partner has the financial capacity to deliver the resources or skills necessary to implement the proposed activity,
  - Either in cash or through in-kind contributions, if HUD awards Tribal HUD VASH funds.
  - Federal sources are only allowed to be used as leveraging if permitted by a program's authorizing statute.

## Subfactor 3.2- Availability of Stock

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### Category #1: Project-Based Rental Assistance



#### Examples of Leveraged Resources

- 1) Tribal Resources
- 2) Federal Resources
- 3) Public Agency, Foundation or Other Private Party
- 4) Goods and Services
- 5) Land

## Subfactor 3.2- Availability of Stock

### Category #1: Project-Based Rental Assistance

Leveraged Resource	Evidence/Documentation Needed
<b>Tribal Resources</b>	<ul style="list-style-type: none"><li>• Tribal resolutions committing funds or equivalent; the resolution (or equivalent) must identify the exact dollar amount (or value of resources to be committed.)</li></ul>

## Subfactor 3.2- Availability of Stock

### Category #1: Project-Based Rental Assistance

#### Leveraged Resource

#### Evidence/Documentation Needed

#### Federal Resources

**IHBG formula funds (whether administered by the tribe or a TDHE):**

- Leveraging with current program year funds:
  - Most recently approved Indian Housing Plan (IHP).
  - Must identify the dollar amount.
  - Commit the IHBG resources to the project.
  - If not currently approved in the most recent IHP, an amendment to the IHP will be processed.
- Future IHBG Funding:
  - Identify program year(s).
  - Identify the dollar amount of IHBG funds used.

## Subfactor 3.2- Availability of Stock

### Category #1: Project-Based Rental Assistance

#### Leveraged Resource

#### Evidence/Documentation Needed

#### Federal Resources

#### Other Federal Program Funds:

- U.S. Department of Agriculture,
- Indian Health Service,
- Bureau of Indian Affairs,
- Any other Federal agency.

**NOTE:** If allowable by the federal program's statute, the applicant should submit statement (e.g. letter, email, etc.) from the federal agency approving the amount of funds to be committed for leveraging.

## Subfactor 3.2- Availability of Stock

### Category #1: Project-Based Rental Assistance

#### Leveraged Resource

**Public Agency,  
Foundation, or  
Other Private  
Party**

#### Evidence/Documentation Needed

- Letters of commitments which must include:
  - The donor organization's name
  - The specific funds proposed
  - The dollar amount of the financial or in-kind resource
  - The method of evaluation
  - The purpose of that resource with the proposed project
  - Signed commitment from an official of the organization legally authorized to make the commitment
- Memorandum of Understanding (MOU), and/or agreement to participate, including any conditions to which the contribution may be subject.

## Subfactor 3.2- Availability of Stock

### Category #1: Project-Based Rental Assistance

Leveraged Resource	Evidence/Documentation Needed
<b>Goods and Services</b>	<ul style="list-style-type: none"><li>• Must demonstrate that the donated items are necessary to the actual development of the project.</li><li>• Must include comparable costs that support the donation.</li></ul>



## Subfactor 3.2- Availability of Stock

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### Category #1: Project-Based Rental Assistance

#### Leveraging Resources (SF-425):

 **Grantees will be required to show evidence that leveraging resources were actually received and used for their intended purposes through quarterly reports (SF-425) as the project proceeds.**

## Subfactor 3.2- Availability of Stock

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### Category #1: Project-Based Rental Assistance

#### Leveraging Resources (Evidence):

- HUD recognizes that in some cases, the applicant cannot receive a firm commitment of non-tribal funds by the application deadline.
- If so, the applicant must include a statement from the contributing entity that describes why the firm commitment cannot be made at the current time.
- Statement must say that the tribe/organization and proposed project meets the eligibility criteria for receiving the leveraged funds.
- Statement must also include a date by which the funding decisions will be made, which cannot be over six (6) months from the anticipated date of grant approval by HUD.

## Subfactor 3.2- Availability of Stock

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### Category #1: Project-Based Rental Assistance

#### Leveraging Resources (Evidence):

- **If the applicant does not provide HUD with evidence of the firm commitment from the original leverage source or an alternative source within 6 months of the date of grant approval, or if anticipated leverage is not provided, HUD will re-rate and re-rank the application with the updated lower leverage.**
- **If the application is no longer fundable after re-rating and re-ranking the application, HUD will rescind the grant and recapture grant funds.**

## Subfactor 3.2- Availability of Stock

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### Category #1: Project-Based Rental Assistance

- **Existing Stock** (page 38 of the Tribal HUD VASH Program NOFA)
  - Indicated in Subfactor 3.1,
  - Applicants proposing to use existing housing stock to house Veterans will not be awarded the maximum points unless newly constructed or acquired for Veterans.
  - Twelve (12) months or less prior to the application deadline established in this NOFA.

## Subfactor 3.2- Availability of Stock

Scoring Criteria	Points
<ul style="list-style-type: none"><li>• Applicant <b>provided</b> firm commitment documentation for all sources of leveraging resources, that it has used or plans to use for the construction or acquisition of housing specifically for Veterans,</li><li>• <u>And <b>one</b> of the following applies;</u><ul style="list-style-type: none"><li>○ Applicant is proposing to <b>increase</b> its housing stock for the use of eligible Veterans by leveraging other funding sources for the construction or acquisition of new units; <b>OR</b></li><li>○ Applicant proposes to use of existing stock that is <b>newly</b> constructed or acquired for Veterans 12 months or less prior to the application deadline established in this NOFA, as identified in Subfactor 3.1.</li></ul></li></ul>	<b>10 points</b>
<ul style="list-style-type: none"><li>• Applicant proposed to <b>leverage</b> other funding sources for the rehabilitation of existing stock for the use of Veterans.</li><li>• Applicant <b>provided</b> firm commitment documentation for all sources of leveraging resources used or plans to use for the rehabilitation project.</li></ul>	<b>8 points</b>

## Subfactor 3.2- Availability of Stock

Scoring Criteria	Points
<ul style="list-style-type: none"><li>• Applicant is <b>not</b> proposing to increase its housing stock specifically for the use of eligible Veterans.</li><li>• Applicant is proposing to use existing housing stock, <b>without</b> associated rehabilitation costs, <b>and the stock is more than 12 months old</b>, from the application deadline established in NOFA for Tribal HUD-VASH program.</li></ul>	<b>5 points</b>
<ul style="list-style-type: none"><li>• Applicant proposed to increase its housing stock for the use of eligible Veterans by leveraging other sources of funding but <b>did not</b> provide firm commitment documentation for all sources of leveraging resources.</li></ul>	<b>0 points</b>

## Subfactor 3.2- Availability of Stock

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### Category #2: Tenant-Based Rental Assistance



Applicants requesting funding must submit supporting documentation demonstrating the availability of rental units where eligible Veterans may be housed, if awarded a Tribal HUD-VASH grant.

## Subfactor 3.2- Availability of Stock

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### Category #2: Tenant-Based Rental Assistance



Documentation must include;

- agreements or
- letters of partnerships with local landlords



Documentation must also show commitment to house eligible Veterans as identified in Subfactor 3.1- Implementation Plan and Implementation Schedule.



## Subfactor 3.2- Availability of Stock

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### Category #2: Tenant-Based Rental Assistance

➔ Other forms of supporting documentation include;

- rental market survey identifying the rental market available for Veterans,
- other documentation satisfactory to HUD demonstrating the availability of housing for Veterans assisted under this program.

## Subfactor 3.2- Availability of Stock

### Category #2: Tenant-Based Rental Assistance

- ➔ Applicants proposing to make their own housing stock available for Tenant-Based Rental Assistance **must provide supporting documentation in the form of a tribal resolution or equivalent** committing units it would offer eligible Veterans under the program.
- ➔ The resolution (or equivalent) must identify the type of housing stock (e.g., FCAS, NAHASDA, etc.), the number of units, and the age of the units.
- ➔ Applicants that propose to use units (50% or higher) that have been constructed, acquired, or rehabbed 12 months or less prior to the application deadline of this NOFA will receive more points than applicants that propose to use older housing stock.

## Subfactor 3.2- Availability of Stock

Scoring Criteria	Points
<ul style="list-style-type: none"><li>• Applicant <b>provided</b> agreements or letters of partnerships with local landlords for all rental units where eligible Veterans may be housed, as identified in Subfactor 3.1- Implementation Plan and Implementation Schedule,</li><li>• The applicant is also <b>proposing</b> to offer its own housing stock as an option for eligible Veterans,</li><li>• Applicant <b>provided</b> a tribal resolution or equivalent identifying the type of housing stock, number of units,</li><li>• Majority age of the units <b>(50% or higher) is 12 months or less</b> from the application deadline of this NOFA.</li></ul>	<b>10 points</b>

## Subfactor 3.2- Availability of Stock

Scoring Criteria	Points
<ul style="list-style-type: none"><li>• Applicant <b>provided</b> agreements or letters of partnerships with local landlords for all rental units where eligible Veterans may be housed, as identified in Subfactor 3.1-Implementation Plan and Implementation Schedule,</li><li>• Applicant is also <b>proposing</b> to offer its own housing stock as an option for eligible Veterans,</li><li>• Applicant <b>provided</b> a tribal resolution or equivalent identifying the type of housing stock and number of units,</li><li>• Majority age of the units <b>(49% or less) is older than 12 months</b> from the application deadline of this NOFA.</li></ul>	<b>9 points</b>

## Subfactor 3.2- Availability of Stock

Scoring Criteria	Points
<ul style="list-style-type: none"><li>• Applicant <b>provided</b> agreements or letters of partnerships with local landlords for <b>all</b> rental units where eligible Veterans may be housed, as identified in Subfactor 3.1- Implementation Plan and Implementation Schedule,</li><li>• The applicant is <b>not</b> proposing to offer its own housing stock as an option for eligible Veterans.</li></ul>	<b>8 points</b>
<ul style="list-style-type: none"><li>• Applicant <b>provided</b> agreements or letters of partnerships with local landlords for some, but <b>not</b> all rental units.</li><li>• Applicant <b>provided</b> other supporting documentation for the remaining rental units where eligible Veterans may be housed, as identified in Subfactor 3.1- Implementation Plan and Implementation Schedule.</li><li>• Applicant is <b>not</b> proposing to offer its own housing stock as an option for eligible Veterans.</li></ul>	<b>6 points</b>

## Subfactor 3.2- Availability of Stock

Scoring Criteria	Points
<ul style="list-style-type: none"><li>• Applicant did <b>not</b> provide agreements or letters of partnerships with local landlords.</li><li>• Applicant provided other supporting documentation for <b>all</b> rental units where eligible Veterans may be housed, as identified in Subfactor 3.1- Implementation Plan and Implementation Schedule.</li><li>• Applicant is <b>not</b> proposing to offer its own housing stock as an option for eligible Veterans.</li></ul>	<b>4 points</b>
<ul style="list-style-type: none"><li>• Applicant did <b>not</b> provide agreements or letters of partnerships with local landlords.</li><li>• Applicant provided other supporting documentation for <b>some</b>, but not all rental units where eligible Veterans may be housed, as identified in Subfactor 3.1-Implementation Plan and Implementation Schedule.</li><li>• Applicant is <b>not</b> proposing to offer its own housing stock as an option for eligible Veterans.</li></ul>	<b>2 points</b>
<ul style="list-style-type: none"><li>• The applicant did <b>not</b> provide <b>any</b> supporting documentation for the rental units where eligible Veterans may be housed.</li></ul>	<b>0 points</b>

## **Subfactor 3.3 - Budget (up to 10 points)**

## Subfactor 3.3 - Budget

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HUD will review the detailed budget (Unit of Assistance Table, estimated administrative fee usage, and if applicable, project costs for the development of new units) according to the following criteria:

1. Budget is thoroughly prepared, with all costs requested on the SF-424 accounted for and calculations shown by the applicant;
2. Budget figures are consistent throughout the application;
3. Costs are allowable, allocable, reasonable, and necessary for implementing the proposed Tribal HUD-VASH program (Please view following slide for definitions); and
4. All budget calculations are mathematically correct.



### ➔ HUD Evaluation Criteria Definition Overview:

- 1. Allowable** = costs meet the Cost Principles criteria in 2 CFR 200 Subpart E.
  - ➔ Example of unallowable cost: alcohol and entertainment!
- 2. Allocable** = all costs must be tied to the workplan activities and incurred within the Period of Performance, including leveraging
  - ➔ Exception: Allowable pre-award proposal costs or land leveraging
- 3. Reasonable** = “prudent person” test
- 4. Necessary** = Costs crucial for implementing activities

## Subfactor 3.3 - Budget

Scoring Criteria	Points
<ul style="list-style-type: none"><li>The detailed budget <b>fully</b> satisfied <b>all</b> of the criteria outlined in this Subfactor.</li></ul>	<b>10 points</b>
<ul style="list-style-type: none"><li>The detailed budget <b>adequately</b> satisfied all but <b>one</b> of the criteria outlined in this Subfactor.</li></ul>	<b>8 points</b>
<ul style="list-style-type: none"><li>The detailed budget did <b>not</b> satisfy <b>two</b> criteria outlined in this Subfactor.</li></ul>	<b>5 points</b>
<ul style="list-style-type: none"><li>The detailed budget was <b>missing</b> information and/or did not satisfy <b>three or more</b> criteria outlined in this Subfactor.</li></ul>	<b>0 points</b>

**End of Rating Factor 3  
Subfactors 3.1, 3.2, and 3.3  
(up to 30 points)**