

US Department of Housing and Urban Development (HUD)
Office of Native American Programs
Indian Community Development Block Grant
FY2024 Notice of Funding Opportunity
Frequently Asked Questions
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The following frequently asked questions (FAQs) have been provided to assist applicants to the Fiscal Year (FY) 2024 Indian Community Development Block Grant (ICDBG) Notice of Funding Opportunity (NOFO).

Section I – Funding Opportunity Description

- 1. Q: In the Changes section of the NOFO, page 5, is the information indicating that Congress has not yet appropriated fiscal year 2024 funds for this program, correct?**

A: No. Congress appropriated FY 2024 funds of \$75,000,000 on March 9, 2024. The correct information is in the NOFO, Section I.B, page 13.

- 2. Q: In the Changes section of the NOFO, page 5, are the period of performance dates listed there, correct?**

A: No. The correct period of performance dates are November 13, 2024 to November 13, 2029, not August 5, 2024 to August 5, 2029. The correct information is in the NOFO, Section II.D, page 16.

- 3. Q: In the Changes section of the NOFO, page 6, is subfactor 2.4 cited correctly in Rating Factor 2?**

A: No. The possible points were reduced for subfactor 2.3 New/Unfunded Applicants, not subfactor 2.4.

Section II – Award Information

- 4. Q: Does the requested grant amount and the amount of the project have to be below the grant ceiling?**

A: Yes. Your ICDBG request (line 18a of the SF-424) cannot exceed the grant ceiling for your region. See NOFO, Section II.a.2, page 14. Applications that exceed the grant ceiling will not be reviewed.

Section III – Eligibility Information

- 5. Q: May a Tribal Organization submit a *draft* tribal resolution on behalf of an Indian Tribe with the application and then submit a *fully executed* tribal resolution after the application due date?**

A: No. The citizen participation requirement is not listed as a curable. See NOFO, Section IV.B.1.j, page 27. Additionally, the ICDBG regulation states that, “prior to submission of the application to HUD, the applicant shall certify by an official Tribal resolution...” See 24 C.F.R. § 1003.604(b). Therefore, a **current**, executed Tribal resolution stating that citizen participation requirements were followed in accordance with 24 C.F.R. § 1003.604 **must be** submitted with the application.

- 6. Q: Can you submit a combined citizen participation resolution and Tribal resolution?**

A: Yes. The combined resolution must state that citizen participation requirements were followed in accordance with [24 C.F.R. § 1003.604](#) and must include all resolution requirements for Tribal organizations as listed in the NOFO, Section IV.B.1.i, page 28.

- 7. Q: Are state-recognized Tribes eligible to apply for the ICDBG NOFO and Imminent Threat grants?**

A: A very limited number of state-recognized Tribes are eligible under the terms of the eligibility requirements described in the NOFO. Please contact your Area Office of Native American Programs (AONAP) if you would like to confirm your Tribe’s eligibility status. Area ONAP contact information can be found in the appendix of the NOFO, pages 76-77 and in the [About ONAP staff directory](#) on the HUD website.

- 8. Q: When was the FY2024 NOFO released? What is the deadline for the application?**

A: HUD published the FY2024 ICDBG NOFO on May 15, 2024. The submission deadline is July 15, 2024.

- 9. Q: Can a Tribe apply for both a Single Purpose grant and an Imminent Threat grant? Is the application process the same?**

A: Yes, Tribes can apply for both types of grants. However, there is a separate application process for Imminent Threat grants. The ICDBG NOFO provides the application process for the ICDBG Single Purpose grant. For the ICDBG Imminent Threat grant, please see e [ONAP Program Guidance 2018-04](#), “Imminent Threat Grants” and the requirements in [24 C.F.R. part 1003 subpart E](#). Imminent Threat funds are awarded on a first-come, first-served basis until the amount set aside for the fiscal year is fully awarded. The Imminent Threat request must be submitted to your local AONAP, following the guidance referenced above.

10. Q: Regarding the letter that is required from the Bureau of Indian Affairs or Indian Health Service, does this only apply to Tribal organizations? How can we find out if HUD has this letter?

A: Yes, the letter is only required for Tribal organization applicants. See NOFO, Section III.A, page 17, which states that “the Bureau of Indian Affairs (BIA) or the Indian Health Service (IHS), must provide a letter that states that the Tribal organization is eligible under Title I of the Indian Self-Determination and Education Assistance Act. A copy of this letter must be included in your application submission, unless your organization has already provided such a letter in previous years approved by HUD and the status of your Tribal organization has not changed.” Please contact your AONAP **prior** to the application deadline to verify whether this letter is on record. In addition, a Tribal resolution authorizing a Tribal organization to submit on behalf of a Tribe must be submitted with the application. See NOFO, Section IV.B.1.1, page 28.

11. Q: Can nonprofit organizations apply? If so, can they submit their own application or are they required to partner with a Tribe?

A: According to 24 C.F.R. § 1003.5(b), Tribal organizations, which can include nonprofits, that are eligible under Title I of the Indian Self-Determination and Education Assistance Act may apply on behalf of any Indian Tribe, band, group, nation, or Alaska Native village eligible under that Act for funds under this NOFO when one or more of these entities have authorized the Tribal organization to do so through concurring resolutions. HUD **will not** review an application submitted by a Tribal organization on behalf of a specific Tribe if the Tribe itself applies in the same funding round. See NOFO, Section III.A, page 17.

12. Q: If the Tribe applies for an ICDBG Single Purpose grant, can a Tribal organization also apply on behalf of a Tribe?

A: No, either the Tribe or the Tribal organization can apply in the same funding round, but not both. HUD **will not** review an application submitted by a Tribal organization on behalf of a specific Tribe if the Tribe itself submits an application for the same funding round.

13. Q: Can ICDBG funds be used to purchase equipment?

A: As stated in 1003.207(b)(1), the purchase of equipment with ICDBG funds is generally ineligible. Exceptions exist, such as for solid waste and fire protection facilities (see 1003.201(c)(1)(ii)).

14. Q: Regarding Public Service activities, if we apply as a Tribal organization that has not received funds for the public service activity, but the Tribe has, can we propose a “quantifiable increase” or would we only qualify if the service was new?

A: Per 24 C.F.R. § 1003.201(e), to be eligible for ICDBG assistance, a public service must be either a new service or a quantifiable increase in the level of an existing service above what has been provided by or on behalf of the grantee in the twelve months before the ICDBG application was submitted. (HUD may make an exception to this requirement if it determines that the decrease in service was outside the grantee’s control.) So, as a Tribal organization applying on behalf of a Tribe, you may propose a quantifiable increase of a public service that was carried out when the Tribe itself was the recipient of the funds.

15. Q: Can ICDBG be used to fund property acquisition for a new single family housing construction project, where ICDBG funds will not be used for the construction costs?

A: Yes. Under 24 C.F.R. § 1003.201(a), property acquisition is an eligible use of ICDBG funds. Acquisition in whole or in part by the grantee, or other public or private nonprofit entity, by purchase, long-term lease, donation, or otherwise, of real property (including air rights, water rights, rights-of-way, easements, and other interests therein) for any public purpose, subject to the limitations of [24 C.F.R. § 1003.207](#).

16. Q: If funded for an infrastructure project, can the organization charge a small entry fee? For example, for qualifying individuals there would be no fee, but those who do not meet the income guidelines may have to pay a small fee for use.

A: Yes. Per 24 C.F.R. § 1003.201(c)(2), **fees for use of facilities**, reasonable fees may be charged for the use of the facilities assisted with ICDBG funds. Charges such as excessive membership fees that have the effect of precluding low- and moderate-income persons from using the facilities are not permitted.

17. Q: Can ICDBG funds be used to rehabilitate units whose occupants were income eligible at the time of move-in, but are not low-income currently?

A: No. The ICDBG program must primarily benefit low and moderate income beneficiaries as defined in [24 CFR 1003.4](#). When determining income eligibility, the occupant must be income eligible at the time of assistance.

18. Q: Are social services buildings, police stations, and court buildings eligible as public facilities?

A: Generally no. They are buildings for the general conduct of government, not public facilities. Under 24 C.F.R. § 1003.4, “**buildings for the general conduct of government**” refers to office buildings and other facilities where the legislative, judicial, or general administrative affairs of the government are conducted. This term does not include such facilities as neighborhood service centers or special purpose buildings located in low- and moderate-income areas that house various non-legislative functions or services provided by the government at decentralized locations. Examples of public facilities are shelters

for the homeless, hospitals, nursing homes, group homes for intellectual disability persons, and temporary housing for disaster victims. It is best to talk to your Grants Management Specialist to help you determine if a proposed building would be eligible. (See 24 C.F.R. § 1003.201, 1003.207(a)(1), and 1003.4, definition of “Buildings for the general conduct of government”).

19. Q: What does the term “general administrative affairs” mean?

A: HUD legal counsel has determined that the phrase “**general administrative affairs**” used in the definition of buildings for the general conduct of government (24 C.F.R. § 1003.4) covers all overall, departmental, program management, and operation functions, including functions carried out by executives, managers, program staff, clerical staff, and support staff such as lawyers and engineers; and purely administrative functions carried out by personnel, payroll, and accounting staffs. Buildings that are used for the general conduct of government are ineligible. However, some buildings may be eligible based on the location and who is mainly being served (e.g., police substation).

As examples, a police headquarters building would fall within the definition of “buildings for the general conduct of government,” but a police substation or a jail would not. An office building containing the community development department would fall within the definition, but a library would not. Generally, the distinction is made between government office buildings and public facilities where services are provided directly to the public.

In determining whether a building is a “building for the general conduct of government,” look at the predominant use of the building. It is important to identify if the project will use funds to assist the public facility building or provide a direct public service. It is best to talk to your Grants Management Specialist to help you determine if the proposed building would be eligible. (See 24 C.F.R. §§ 1003.201, 1003.207(a)(1), and 1003.4, definition of “Buildings for the general conduct of government”).

Note that you may prorate costs in your ICDBG application if you have a multi-use building where some functions are eligible under ICDBG and some are not.

Section IV – Application and Submission Information

20. Q: Please clarify what is meant by “must principally benefit Low-to-Moderate Income (LMI)” and “70% of the grant funds must be used for activities that benefit LMI persons.”

A: Title I of the Housing and Community Development Act of 1974 establishes as its primary objective the development of viable communities by providing decent housing and a suitable living environment and expanding economic opportunities, principally for persons of low and moderate income. Consistent with this

objective, not less than 70% of the expenditures of each single purpose grant shall be for activities that meet the criteria set forth in [paragraphs \(a\), \(b\), \(c\), and \(d\) of 24 C.F.R. § 1003.208](#).

21. Q: What is a community-based development organization, and what is the criteria to qualify as one?

A: The regulation at 24 C.F.R. § 1003.204 describes the characteristics of eligible community-based development organizations (CBDOs) and the special activities that CBDOs can carry out, including new housing construction and other special activities that carry out a neighborhood revitalization, community economic development, or energy conservation project. Applications for new housing construction must demonstrate that the new housing construction will be carried out by a CBDO. This is a threshold requirement in the NOFO, Section IV.B.1.j, page 28. Contact your ONAP Area Office to find out if your organization has been previously approved as a CBDO. Refer to [24 C.F.R. § 1003.204\(c\)](#) for information about qualifying CBDOs; applicants or subrecipients may qualify as a CBDO under any of the options listed. Tribally Designated Housing Entities (TDHEs) or other Tribal organizations may qualify under 24 C.F.R. § 1003.204(c)(2)(iv), as a Tribal-based nonprofit organization. Such organizations are associations or corporations duly organized to promote and undertake community development activities on a not-for-profit basis within an identified service area.

22. Q: Is there an example of how the Implementation Schedule and Implementation Schedule Narrative should interact?

A: An applicant must submit an Implementation Schedule (form HUD-4125) and can include a narrative description of the Implementation Schedule in the Workplan Narrative. Together, the Implementation Schedule and narrative description of the Implementation Schedule in the Workplan Narrative must include a detailed breakdown of the tasks needed to complete the project, as described in subfactor 3.3. See NOFO, Section V. Subfactor 3.3, page 52.

Example of narrative description of Implementation Schedule:

Project Implementation Plan

Please see the attached HUD-4125 Project Implementation Schedule

(attachment D) for a breakdown of the tasks needed to complete this project. The project assumes a start date of XXX and anticipates a close date of XXX. Project staff will present progress updates to the Executive Director, not less than monthly, to ensure the day-to-day work performance will result in a timely completion of the project. Once the grant funds are received, the project team will proceed according to the Implementation Schedule:

- *Upon receipt of the Notification of Award Letter, any pre-award or special conditions will be addressed including environmental review per 24 C.F.R. part 58.*

- *By XXXX, the design plans will be finalized and any adjustments requiring HUD notification will be submitted to HUD.*
- *Phases of rehab will be conducted on the noted units between XXXX and XXXX.*
- *Quarterly and annual financial and progress reporting will be submitted to HUD on the dates noted.*
- *Final walk-through inspections will be completed by XXXX.*
- *Grant Closeout will start by XXX and be completed by XXXX.*

Note that for applications proposing multiple projects, applicants must submit a separate Implementation Schedule for each project. (See NOFO, Section IV. B.e, page 26).

23. Q: Is the Budget Detail narrative included within the Workplan Narrative, or as an attachment?

A: Applicants must include a Budget Detail. The Budget Detail may be included as a separate attachment from the Workplan Narrative, or included in the Workplan Narrative. Please see that the Budget Detail includes a breakdown and description for each budget line, including all sources and uses of funding for the proposed project(s). See NOFO, Section IV.B.1.i, page 27 for more information on the Budget Detail.

24. Q: The Budget Detail calls for details on indirect costs. What more should be included aside from the amount?

A: Please refer to the NOFO, Section IV.B.1.w, page 30 for detailed instruction regarding indirect costs. Also refer to the description of the Budget Detail submission at Section IV.B.1.i, page 27. Finally, ensure you are including the details on indirect costs that affect your score at Subfactor 3.2 Budget. See NOFO, Section V, pages 51 to 52.

25. Q: Are there specific formatting and page limit requirements for narratives?

A: No. There are no formatting or page limit requirements for narratives as indicated in the changes section of the NOFO. However, in Section IV.B, page 33, the NOFO reference that the Budget Detail does not count toward the 30-page limit for narratives, but this is a misstatement as there is no page limit.

26. Q: There are two sections in the NOFO regarding racial equity. Are applicants required to provide a narrative for both Advancing Racial Equity (Section III.F, page 21) and Experience Promoting Racial Equity (Section III.F, page 22)?

A: Not necessarily. A narrative submission is optional for addressing “Advancing Racial Equity”. See NOFO, Section III.F, page 21. However,

applicants must submit a narrative to address “Experience Promoting Racial Equity” or state that they are using the IHP to fulfill this requirement. See NOFO, Section III.F, page 22. These response(s) may be included in the Workplan Narrative or in a separate document. In either case, be sure to clearly label it as your response to either the relevant requirement (as applicable).

Section V – Application Review Information

Rating Factor 1

27. Q: In Rating Factor 1, Subfactor 1.1, how would we discuss contractors if we have not determined our contractors prior to submission?

A: If the contractor has not been determined prior to submission, the application should discuss this in the capacity gap analysis. Keep in mind that contractors’ expertise only needs to be described if the contractors are key staff in planning, managing, and implementing projects. If the contractor will be key staff, you must provide an assessment and plan for addressing the identified gaps, including timelines and methods. See NOFO, Section V, RF1, Subfactor 1.1.

28. Q: In Rating Factor 1, Subfactor 1.5, will grants awarded to both the Tribe and TDHE be evaluated?

A: No. We will evaluate the performance of the applicant only.

Rating Factor 2

29. Q: In Rating Factor 2, Subfactor 2.1, what does “housing cost burden” mean?

A: A household is said to be cost-burdened when it pays more than 30% of its income toward housing expenses and may have difficulty affording necessities such as food, clothing, transportation, and medical care. Note that the Needs Table for subfactor 2.2.c uses the Indian Housing Block Grant (IHBG) definition of cost burden (housing cost greater than 50% of annual income). Either standard may be used if you choose to include this information in 2.1.

30. Q: In Rating Factor 2, Subfactor 2.2, is an infrastructure project that supports new housing considered a housing project? In other words, will the demographic requirements be needed?

A: This project would be categorized as an infrastructure project and would be evaluated under Subfactor 2.2.a. Demographic information is required (HUD data, your own data, or information that the project will serve a limited clientele).

31. Q: In Rating Factor 2, Subfactor 2.2.a, are applicants required to demonstrate that proposed project(s) will exclusively serve a limited clientele?

A: Not necessarily. In 2.2.a, the applicant can rely on Census data, choose to provide its own data, or demonstrate that the proposed project will serve a limited clientele. Limited clientele activities are described in [24 C.F.R. § 1003.208\(b\)](#). Note that in order for your project to qualify as limited clientele under 24 C.F.R. § 1003.208(b)(1)(i), it must exclusively serve that clientele group (i.e., abused children, battered spouses, elderly, homeless, etc.).

32. Q: In Rating Factor 2, Subfactor 2.2.a, can you apply if none of the 3 HUDUSER data options (i.e., Tribal area, census tracts, or census block group) meet the 70% threshold, and you don't have an independent survey?

A: In order to be rated and receive funding consideration, all applicants must demonstrate that at least 70% of the grant funds will be used for activities that benefit LMI persons in accordance with the requirements of 24 C.F.R. § 1003.208. If you can meet that threshold requirement, your project can be rated under 2.2.

33. Q: What is the Needs Table referenced in Rating Subfactor 2.2.c? How do I find it and how is it used?

A: The Needs Table is located in the zip file with the Application Instructions for the ICDBG program. In [Grants.gov](#), click the package tab, click preview, then click Download Instructions. A zip file that includes the Needs Table will download. The table is also available on Codetalk here: [FY 2024 ICDBG Needs Table](#). The Needs Table is used to score Subfactor 2.2.c (housing projects).

34. Q: In Rating Factor 2, Subfactor 2.2.c, what data source is used to determine "need"? Can a Tribe /TDHE use other data or its own data?

A: The Factor 2 Needs Table is used to award points in subfactor 2.2.c. The Needs Table is prepared by HUD based on data gathered under the IHBG formula program. Additional information on the Needs Table data is in the NOFO, Subfactor 2.2.c, pages 48 to 49. Applicants with housing projects can provide their own data in 2.1, but in 2.2.c. such projects will be awarded points based on the Needs Table.

35. Q: In Rating Factor 2, Subfactor 2.3, points are provided to applicants who have not received an ICDBG award. Does this apply to any applicant for a Tribe, whether it's a Tribal Organization or the Tribe itself?

A: No. We will evaluate grants received by the applicant only.

Rating Factor 3

36. Q: In Rating Factor 3, subfactor 3.1, what would be the best way to show cost effectiveness?

A: Because of the variety of projects allowed under the ICDBG NOFO, the best way to show cost effectiveness depends on the proposed project. For example, for some projects cost effectiveness can be shown by describing and providing cost savings in percentage or dollar amounts resulting from building design or construction methods, or energy efficiency measures that will be realized in future years.

37. Q: In Rating Factor 3, subfactor 3.1, how do you address the component about Indian Preference?

A: The NOFO requires that you describe how you will comply with Indian Preference requirements, which are at [24 C.F.R. § 1003.510](#). This regulation requires that to the greatest extent feasible, preference for Indians and Indian organizations be provided in contracting and employment. You can describe how you will comply with this requirement by discussing whether you have procedures and policies on Indian Preference in place, and how you ensure they are followed.

38. Q: In Rating Factor 3, subfactor 3.1, Land for Future Housing projects, the NOFO indicates that the application must establish that there is a reasonable ratio between the number of usable acres to be acquired and the number of LMI households to benefit from the project. Please explain what is considered to be a reasonable ratio.

A: The NOFO asks the **applicant** to establish reasonableness. That said, in reviewing this subfactor, no more than 1 acre per home will be considered reasonable. Other ways to establish reasonableness could be how the proposed density compares with average density in a particular area/community, or how the land cost affects total project costs.

39. Q: For subfactor 3.3, are we required to complete milestones prior to submission to receive the full eight points, and what are some examples of milestones?

A: Yes. To receive the full eight points, the Workplan Narrative must describe whether you have already completed one or more milestones to facilitate the implementation of the proposed project or activities. You will score a maximum of four points if you have not completed any milestones. A milestone is any step that you have taken to plan and implement your project such as project planning with partners, site selection, citizen participation, environmental review or developing project plans and specifications.

40. Q: For public facilities in 3.4.a, if we are providing services in the proposed public facility, who writes the letter of commitment?

A: Whoever is providing the services should write the letter of commitment.

41. Q: Is the analysis for public benefit requested in Subfactor 3.4.b a separate report, or is it to be included in the Workplan Narrative?

A: HUD will accept the analysis in the Workplan Narrative or as a separate report.

Rating Factor 4

42. Q: Should Public Service costs be included before calculating the percentage of leverage funds?

A: Yes, Public Service costs should be included when calculating the percentage of leverage funds. Instructions and an example for calculating the percentage of leverage costs is provided in the NOFO, Section V, page 61.

43. Q: Can you give an example of a “Realtor Value Guide”?

A: Applicants should contact a certified Realtor to obtain land value information.

44. Q: If the leveraged funds are from IHBG for an upcoming fiscal year, what is required for the leverage rating factor?

A: If future IHBG funds will be used, then the application must identify the program year and the dollar amount of IHBG funds that will be used. See NOFO, Section V, Rating Factor 4 Chart.

45. Q: Is it possible to use ICBDG funds to complete a single-family housing construction project that was funded with IHBG, and for the IHBG funds to count as leverage?

A: ICDBG funds may be used in the project, but if the project is already under construction, the IHBG funds would not count toward leverage. With the exception of the value of land acquisition and proposal costs, funds that have been expended on the project prior to the period of performance start date will not be counted as leverage. See NOFO, Section V, Rating Factor 4.

46. Q: Can the cost of an environmental review be used as leverage if paid by a different entity?

A: Yes. Cost paid by another entity such as a TDHE or other organization can be used as leverage.

47. Q: Can you use the pre-award cost of preparing site plans and elevations as leverage if those costs are not part of the proposal cost?

A: No. The only permissible pre-award costs are proposal costs incurred to prepare an application for submission under this NOFO and the value of land acquisition used toward an applicant's leveraging contribution.

48. Q: Is there a timeframe when pre-award costs or activities can be counted for and how far back can they occur?

A: There isn't a set timeframe. However, the costs must be associated with the ICDBG activity/project.

49. Q: Can you define the difference between administrative costs and indirect costs? Does the NOFO say you can use proposal costs covered by non-ICDBG as leverage? If so, is that considered a direct cost, not program administration?

A: **Administrative costs** are described in the ICDBG regulation at 24 C.F.R. § 1003.206 and indirect costs are defined at 2 C.F.R. § 200.1. **Indirect costs** are incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. Per the NOFO and the ICDBG regulation, no more than 20% of the sum of any grant plus program income received can be expended for program administration costs and planning activities described in 24 C.F.R. §§ 1003.206 and 1003.205. Both the indirect costs for the applicant and any other direct administrative expenses would fall under the 20% cap, except this cap does not apply to staff and overhead costs directly related to carrying out activities eligible under 24 C.F.R. § 1003.201 through 1003.204.

In Rating Factor 4, the NOFO states that leveraged resources do not include indirect costs. It also states that proposal costs can be acceptable leverage. Please ensure you are familiar with how indirect costs are charged to the grant, so that your application aligns with it and the applicable requirements in the NOFO. If grant proposal expenses are not charged to the grant as indirect costs, the cost of developing the proposal can be charged to the grant as a direct administrative cost, per 24 C.F.R. § 1003.206(d).

Rating Factor 5

50. Q: In Rating Factor 5, Subfactor 5.1, is the text correct? It appears to be calling for applicants to identify and describe how they plan to coordinate and work on the project with organizations that will not be providing leveraged funds to the project.

A: Yes, this language is correct. Although you may coordinate with entities providing leveraged funds/resources, the language in Rating Factor 5 is looking for your plans to coordinate and work on the project with organizations that will not be providing leveraged funds to the project.

51. Q: In Rating Factor 5, Subfactor 5.2, does including outputs and outcomes mean providing actual numbers and percentages?

A: Yes, the applicant must provide actual numbers and percentages to obtain points for this subfactor. These should be quantifiable measures or indicators that identify the change in the community, people's lives, economic status, etc.

General ICDBG questions

52. Q: Where can I find the training slides or a recording of the FY 2024 ICDBG NOFO Training?

A: The FY 2024 ICDBG Training Slides and a recording of the FY 2024 ICDBG Grantee NOFO Training, among other ICDBG resources, are available on the [Indian Community Development Block Grant Program webpage](#).

53. Q: Is there a way to confirm that HUD has received my Code of Conduct?

A: Yes. Applicants can check the [Code of Conduct Requirements and e-library link](#) located in the NOFO, Section VI, page 75, to confirm that HUD has received their Code of Conduct. If your organization is not listed in the [Code of Conduct e-library](#), please submit it with your application.

54. Q: Is there a limit on how old an environmental review can be?

A: HUD policy is to recommend a new environmental review every five years, or sooner if or when environmental conditions change.

55. Q: Can grant funds be used to complete the environmental review?

A: Yes. The cost of environmental reviews, including costs incurred in complying with any of the related laws, is eligible to the extent allowable under the HUD assistance program regulations. See 24 C.F.R. § 58.23. The ICDBG NOFO discusses environmental review costs as an eligible cost/activity in several places.