

Introduction to the Indian Housing Block Grant (IHBG) Formula

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Training Objectives

- To provide context
 - Understand how Formula was developed
 - Know different roles/responsibilities
 - Know resources exist
 - Understand Formula at high level
- To provide details
 - Understand Formula data, mechanics, and policies
 - Understand Formula procedures
 - Know what is expected of you
 - Know what resources exist

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Acronyms

- | | |
|--|--|
| • ACC=Annual Contributions Contract | • FCAS=Formula Current Assisted Stock |
| • ACS=American Community Survey | • FMR=Fair Market Rent |
| • AEL=Allowable Expense Level | • FRF=Formula Response Form |
| • AIAN=American Indian and Alaska Native | • HH=Household |
| • ANV=Alaska Native Village | • HO=Homeownership |
| • ANVSA=Alaska Native Village Statistical Area | • IHA=Indian Housing Authority |
| • AONAP=Area Offices of Native American Programs | • IHBG=Indian Housing Block Grant |
| • APR=Annual Performance Report | • IHP= Indian Housing Plan |
| • BIA=Bureau of Indian Affairs | • LOCCS=Line of Credit Control System |
| • CE=Conveyance Eligible | • LR=Low Rent |
| • DOFA=Date of Full Availability | • MH=Mutual Help |
| | • MHOA=Mutual Help Occupancy Agreement |

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... And if that wasn't enough

- MOA=Memorandum of Agreement
- NAHASDA=Native American Housing Assistance and Self-Determination Act
- NDS=New Data Source
- ONAP=Office of Native American Programs
- OpModSub=Operation and Modernization Subsidies
- PD&R= Office of Policy Development and Research
- OTSA=Oklahoma Tribal Statistical Area
- SDAISA=State Designated American Indian Statistical Area
- TAR=Tenant Account Receivables
- TDC=Total Development Costs
- TDHE=Tribally Designated Housing Entity
- TDSA=Tribally Designated Statistical Area
- TKYIII=Turnkey III
- TRSAIP=Total Resident Service Area Indian Population
- UDF=Undisbursed Funds Factor

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IHBG Formula Development

- Objectives
 - Fair and equitable distributions for all Tribes
 - Based on consistent, defensible, objective data
- Developed by
 - Negotiated rulemaking (three times since 1996)
 - Unanimous consensus
 - With data appeal process
- Latest Formula changes
 - Effective December 22, 2016

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Formula Administration

- Administered at national level
- In consultation with AONAPs to ensure processing consistency and fair allocations

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HQ Grants Management (GM)

- Oversight of all Formula matters
- Provides guidelines for technical assistance response
- Reviews data correction and challenge responses to ensure policies, procedures, regulations & statutes followed
- Reviews Formula code and data changes
- Coordinates response to complex issues with OGC, AONAPs, and contractors
- Develops forms, guidance, notices, and policies & procedures
- Point of contact for Congress, White House, media, associations, researchers, and Government Accounting Office & HUD Office of Inspector General audits

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IHBG Formula Customer Service Center

- Provides technical assistance
- Drafts responses to data corrections and challenges
- Maintains and operates Formula code and data
- Runs Formula simulations
- Produces estimate/final Formula allocations and summary statistics
- Updates forms, policy and procedures, & other documentation

• Contact:

- Phone: 1-800-410-8808
- Fax: 202-393-6411
- E-mail: IHBGformula@firstpic.org

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Tribes/TDHEs

- Review Formula Response Form (FRF) and Final Allocation/Data Form
- Report discrepancies to Formula Customer Service Center
 - ***Note:** Reporting on the Indian Housing Plan/Annual Performance Report (IHP/APR) is not sufficient. Tribes must report discrepancies to the IHBG Formula Customer Service Center!
- Request technical assistance from IHBG Formula Customer Service Center if needed
- Challenge data when it is perceived to be in error

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Deadlines

- Review every year
 - FRF usually mailed June 1st
 - Corrections usually due by August 1st
 - Census Challenges usually due March 30th of prior FY
- Submit to IHBG Formula Customer Service Center
- Final allocations due 60 days after budget

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Formula Response Form (FRF)-Formula Current Assisted Stock (FCAS)

- A1-Conveyance Eligibility and Units with Conveyance Delays
- A2-DOFA of Newly Built Units
- A3-Conversion of Units
- A4-Demolition/Rebuilding
- A5-All other Corrections

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Formula Response Form-Other

- Appendix B1-Formula Area for Defined Formula Areas
- Appendix B2-Formula Area for Substantial Housing Services
- Appendix C-Enrollment for Overlaps
- Appendix D1-Tribal Enrollment
- Appendix D2-Population Cap

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Other corrections due August 1

- Total Development Cost (TDC)-Approval and documentation from AONAP or HUD HQ
- Fair Market Rent (FMR)-Approval and documentation from HUD PD&R
- Total Resident Service Area Indian Population (TRSAIP)-Approval and documentation from BIA

https://www.hud.gov/program_offices/public_indian_housing/ih/codetalk/onap/ihbgformula

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Census Challenge due March 30

- FY 2024 Needs data sent in FY 2023 FRF on June 1, 2022. Census Challenge is due March 30, 2023.
- Census Challenges guidelines are found here: <https://www.hud.gov/sites/dfiles/OCHCO/documents/4119Census.pdf>
- Tribes should not undertake a challenge without reading guidelines thoroughly. They are encouraged to receive TA from Formula Center.

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PIH Notices

- **PIH 2017-14:** Provides Tribes and TDHEs with information related to changes affecting the Needs data under the IHBG Formula (24 CFR 1000.330).
- **PIH 2017-15:** Provides Tribes and TDHEs with information related to changes affecting the FCAS data under the IHBG Formula (§ 1000.316 and § 1000.318(b) and (e)).
- **PIH-2017-16:** Provides Tribes and TDHEs with an overview of regulatory changes affecting the IHBG Formula.
- **PIH 2019-07:** Provides guidance for determining and using program income generated by the use or disbursement of IHBG funds.

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IHBG FORMULA CALCULATION

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A Tribe's IHBG allocation depends on:

- The amount available for allocation
- Formula Current Assisted Stock (FCAS)
- Share of National Needs
- Other Formula adjustments

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High-level Formula

- Formula Current Assisted Stock (FCAS)
 - Eligible units
 - Inflation
 - Local cost adjustments (AEL, FMR, TDC)
- Need
 - Variables, weights & local cost adjustment (TDC)
 - Formula Area
 - Minimum Needs Funding
 - Volatility control of changes in Need caused by New Data Source (NDS)
- 1996 Minimum
- Adjustments for prior year over/under-funding
- Undisbursed IHBG Funds Factor (UDFF)
- Minimum total allocation of carry-over funds

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Total IHBG FY 2022 Grant allocation was \$774.8 million

(including appropriations, carryover and net of repayments and grant adjustments)

	Average Grant	Minimum	Maximum
U.S. Total	\$1,304,382	\$ 86,058	\$65,552,664

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Step 1: Calculate FCAS Support for operating/modernizing units built under the programs replaced by NAHASDA

Operations

- Per Unit
 - \$2,440 for LR units
 - \$528 for MH/TKIII units
 - \$3,625 for Section 8 units
- Inflation
- Local Area Cost Adjustment (AEL/FMR Index)

Modernization

- Per Unit
 - \$1,974 for LR, MH and TKIII
 - \$0 for Section 8
- Inflation
- Local Area Cost adjustment (TDC)

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Per Unit Amount is Highest for LR

(FY 2022 Calculations After Adjustment for Inflation)

Eligible Units	Operating Element	Modernization Element	Total Per Unit Amount
Homeownership Units	\$962	\$3,599	\$4,562
Low Rent Units	\$4,449	\$3,599	\$8,048
Section 8	\$6,610	0	\$6,610

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Local Cost Adjustment Factor can have a big impact

Area Office	AEL/FMR Factor Range (FY 2022)	TDC Factor Range
Alaska	2.8 – 3.8	1.4 – 1.8
Phoenix	0.8 – 2.1	0.9 – 1.3
Seattle	0.9 – 1.3	1.0 – 1.2
Chicago	0.7 – 2.4	0.8 – 1.5
Denver	0.7 – 1.5	0.9 – 1.0
Oklahoma	0.7 – 0.9	0.8 – 0.9

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How much did Tribes get per unit in FY 2022 for FCAS?

(Initial Calculation – Base*Inflation*Local Area Cost Adjustment Factor)

	Minimum	Maximum	Eligible Units	# of Tribes with Units
LR	\$6,094	\$22,229	30,180	225
HO	\$3,601	\$10,012	3,412	134
SB	\$4,801	\$19,908	3,559	22

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Step 2: Calculate Needs

Total Amount Available -(minus) Amount needed for FCAS =(equals) Amount to be distributed under the Needs Component based on each Tribe's share of national needs as measured by seven variables, with national minimum and phase-down adjustment (volatility control)

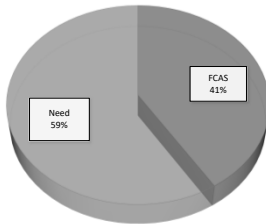
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Step 3: Other Formula Provisions

- 1996 Minimum
- Adjustments for Prior Year Over/Under-Funding
- Undisbursed IHBG Funds Factor (UDFF)
- Minimum Total Allocation using Carry-Over Funds

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FY 2022 FCAS and Need



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**WHAT COUNTS AS
FCAS And HOW DO I
REPORT?**

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What counts as FCAS?

Counts

- Units funded under 1937 Act
- Conversions before 10/1/97
- CE but beyond Tribe's control
- Anticipated DOFAs
- Section 8 still in management
- Demolished/replaced in year
- Burnt/rebuilt w/proceeds in year
- CE units w/executed plan*

*see PIH Notice 2017-15 for more information.

Does Not Count

- NAHASDA units
- HOME, ICDBG, State units
- Units over ACC with DOFA after 10/1/97
- IHA financed units
- Non-dwelling units including vacant units not being made available for occupancy
- Conversions after 10/1/97
- Conveyances
- CE with TARs
- Section 8 not in management

How do we determine unit type?

- It generally depends on the original ACC which specified the program and type of unit.
- But conversions happen –
 - If converted before 10/1/97, as evidenced by amended ACC, then counted for funding as type of unit it converted to.
 - If units converted on or after 10/1/97, then funded as type specified on original ACC in effect on 9/30/97.

Unit types sometimes differ in Tribe and HUD records

- Continued eligibility is based on the type of unit as managed.
- But HUD takes action based on type of unit as recorded in FCAS database.
- Correct treatment requires good communication, reporting by Tribes.
- Tribes must be prepared to report all conversions on FRF Appendix A3.

Units NOT eligible as FCAS

- Units built over the number specified in the original ACC for projects with DOFA after October 1, 1997
- Units constructed with NAHASDA, Indian Community Development Block Grant (ICDBG), or HOME funds
- Conveyance-eligible units
- Units NOT used as low-income housing dwelling units
 - Demolished units, unless rebuilt within one year
 - Units used for non-dwelling purposes
 - Vacant units, unless being made available for occupancy
 - Units being used for Tribal Veterans Affairs Supportive Housing (VASH) program

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Most of the changes to FCAS are because HO units become conveyance eligible

- Conveyance eligibility occurs when:
 - Unit paid-off **OR** term of the MHOA expires
 - Whichever comes first
 - TARs not a reason for continued eligibility

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Units are removed from FCAS in FY following CE UNLESS

- Reasons beyond Tribe's control
- After reasonable efforts **AND**
- Legal impediments remain

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Units CE before 12/22/16

- Effective date of revised Formula regs
- If **no** reasonable efforts taken and legal impediments outstanding, then not eligible FCAS
- If reasonable efforts taken and legal impediments remain, then assigned new CE Date of 12/22/16
- Processed under new regs once CE 12/22/16 or later

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Use Appendix A1-1 to report conveyance eligibility of units

- On Table A1-1 below Report:
- ❖ All units that have been conveyed that did not have legal impediments preventing conveyance.
 - ❖ All units that are conveyance eligible but not conveyed.

TABLE A1-1: Conveyed units and conveyance-eligible units that did not/do not have legal impediments preventing conveyance

Project Number	Unit Number	Conveyance Eligibility date*	Conveyance date

*The conveyance eligibility date is the date that the unit's purchase price was paid-off, whether through lump sum payment, accrual in equity accounts, self-amortization of the purchase price, or any combination of these. Because the MHQA has a self-amortizing purchase price, pay-off necessarily occurs no later than the end of the term of the MHQA.

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Legal Impediments

- Action legally prohibited conveyance, or
- 3rd party failure (not Tribe/TDHE) to take action legally required for conveyance
- Examples include:
 - Delays in obtaining or absence of Title Status Reports. (If required for conveyance)
 - Incorrect/inadequate legal descriptions or other legal documentation necessary for conveyance
 - Clouds on title due to probate or intestacy or other court proceedings

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Non-legal impediments to conveyance

- Inaction by Tribe/TDHE
- Delays arising from failure by Tribe/TDHE to
 - Enforce strict compliance by homebuyer with MHOA
 - Ex: Accrual of TARs
- Do not justify eligibility of CE unit past CE date

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Reasonable Efforts

Up to 4 months after CE

- Document reasonable efforts
- Document legal impediments
- When unit becomes CE under terms of MHOA
 - Tribe/TDHE took all other steps necessary to convey, but can't because a legal impediment prevents it
- May include preparation in anticipation of CE, for example:
 - Preparing documents
 - Confirming land descriptions
 - Scheduling or obtaining Board resolutions

*Provisions in Notice PIH 2017-15

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Reasonable Efforts

Between 4 to 24 Months

- Prior requirement **AND**
- Have written action plan including:
 - Description of and applicable documentation supporting specific legal impediments
 - Specific, ongoing, appropriate actions for each applicable unit to resolve legal impediments
 - Actually convey unit within 24-months
- Implement plan and document efforts
- Submit plan on 1st FRF after CE date or 2-years after CE (whichever 1st) for HUD's decision to back-fund CE unit previously removed

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Reasonable Efforts

After 24 months

- Prior requirements **AND**
- Third party documenting legal impediments
 - Third parties include Court, and State & Federal Government Agencies.
- Evidence required annually for consideration.

Use Appendix A1-2 to report when conveyance of unit with legal impediment occurs

On Table A1-2 below Report:

- All units that are paid-off that have legal impediments preventing conveyance.
- All units that were previously removed as conveyance eligible that had legal impediments and that have since conveyed.
- For each unit meeting the criteria in bullets 1 and 2 above, provide reasons that conveyance was beyond the tribe's control and steps the tribe has taken to resolve the problem. For further information see PIH Notice 2017-15.

Project Number	Unit Number	Conveyance Eligibility date*	Conveyance date	Explanation of legal impediments preventing timely conveyance**

*The conveyance eligibility date is the date that the unit's purchase price was paid-off, whether through lump sum payment, accrual in equity accounts, self-amortization of the purchase price, or any combination of these. Because the MHOA has a self-amortizing purchase price, pay-off necessarily occurs no later than the end of the term of the MHOA.
 **Explanation of legal impediments preventing timely conveyance of each unit can be provided on supplemental pages if more space is needed.

Converted Units

- If converted *before 10/1/97*, as evidenced by amended ACC, then counted for funding as type of unit it converted to
- If units converted *on or after 10/1/97*:
 - Funded as type specified on original ACC in effect on 9/30/97
 - Continued FCAS eligibility as type converted
- If conversion date unknown,
 - If HO unit, then report term & date of MHOA
 - If LR unit, then assume after 10/1/97
- Must report ALL conversions on FRF (Appendix A3)

Use Appendix A5-1 to report non-dwelling, vacant, and units not occupied by a NAHASDA eligible family

- Units used for non-dwelling purposes
- Vacant units, not currently available for occupancy (unless they are being made available for occupancy)
- Units not occupied by NAHASDA-eligible family

TABLE A5-1: Units not used as low-income dwelling units

Project Number	Unit Number	Date unit was last occupied by eligible recipient	Reason for change

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Use Appendix A5-2 to report subsequent homebuyers

TABLE A5-2: Units with Subsequent Homebuyers

Project Number	Unit Number	New Agreement Signed Date	Term of the Agreement (in years)

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Use Appendix A5-3 to report all other corrections to FCAS

TABLE A5-3: All other corrections to FCAS

Project Number	Formula Response Form Unit Counts & Unit Type	Correct Number of Units & Unit Type	Reason/Explanation for Change

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HUD DOFA challenge

- HUD removes all HO units with DOFA dates more than 25 years prior unless eligibility of unit was re-justified in last 3 years.
- FRF will show the project with 0 units and an asterisk if removed in that FY. The project will not show at all in later years.

Project Number	Low Rent	Mutual Help	Turnkey III	In Development	DOFA
8005000	21	0	0	0	3-1-1978
8005037*	0	0	0	0	3-31-1993
8005038	0	12	0	2	3-31-1999
8005039	10	0	0	0	3-31-2000
8005040	17	0	0	0	3-31-2000
8005041	0	18	0	0	3-31-1999
8005042	0	2	0	0	12-31-2002
8005042	0	1	0	0	12-31-2002
8005042	0	1	0	0	12-31-2002
8005042	0	1	0	0	12-31-2002
8005042	0	1	0	0	12-31-2002
8005042	0	2	0	0	12-31-2002
8005042	0	2	0	0	12-31-2002

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Removed units may still be eligible as FCAS

- Report subsequent homebuyers on Appendix A5 Table 2.
- Report units converted to LR and actively managed on Appendix A3.
- The new MHOA or conversion must have taken place prior to the expiration date of the first MHOA.
- Keep your supporting documentation. You will have to re-justify every 3 years.

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Determining CE Dates

- Tribes report on FRF
- HUD action based on 25 years after DOFA
 - MHOAs typically had 25-year term under '37 Housing Act
 - HUD removes units from FRF 25 years after DOFA
- Exceptions
 - Subsequent homebuyer with new MHOA date and term
 - Unit is still within term
 - Unit converted to LR
 - Reasonable efforts but legal impediments
- Units with approved exceptions
 - Removed from FRF every 3 years
 - Unless additional documentation submitted and approved

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Incorrect Reporting

- Required use of FRF
 - HUD has 3 years to initiate action
 - Tribe has 5 years to repay
- No back-funding for failure to report
 - Except if under-count was reported or challenged prior to October 30, 2003

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Need

- 0.11 AIAN Persons
- 0.13 AIAN Households < 30% Median Income
- 0.07 AIAN HH 30%-50% Median Income
- 0.07 AIAN HH 50%-80% Median Income
- 0.25 AIAN HH Overcrowded or No Kitchen/Plumb
- 0.22 AIAN HH Paying > 50% of Income for House
- 0.15 AIAN HH <80% Median Income-Assisted Units

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Need Data

- AIAN Persons - 2010 US Decennial Census Data
 - Adjusted for census under-count for trust/res/remote AK
 - Updated annually U.S. Census population estimates
- Other 6 variables- American Community Survey (ACS)
 - 5-Year rolling data updated annually
 - FY 2022 Formula used 2013-2017 data
- Both data sets
 - Consistent, defensible, objective data
 - Higher of multi/single race
 - Represents National share of each variable
 - TDC used to adjust for local cost differences
 - Census challenge process March 30 deadline
 - Tied to Formula Area

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Census Challenges

- Can't use different ACS data set or different Decennial Census to challenge Census data
- Challenges good for 5 years
 - Tribe can opt to go back to Census data
 - Once switched back, can't return to challenge data
- Undercount adjustment not applied to challenge data
- Don't have to challenge all variables HOWEVER
 - Must submit for all variables surveyed
 - If challenging one low income variable all three must be challenged
- Challenge data can't be older than Census data
- Census pop growth estimates applied to challenge data
- Can challenge pop growth estimate but through census process

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Census Challenge Guidelines

- Submit data and documentation by March 30th
 - See "Challenging U.S. Decennial Census Data: Guidelines for the Indian Housing Block Grant Formula"
- Count only AIAN persons living in Formula Area
- Data sources
 - Tribal survey in accordance with HUD guidelines
 - Few other options possible but not likely
 - Tribal enrollment data if significant per capita payments
 - Indian Health Service data if data made available to HUD
 - Labor Force reports only if method verified
- HUD can challenge data too

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Formula Area often differs from Indian Service or Service Area

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Use Appendix B1 for these Formula Areas

- Reservations
- Trust Lands
- Department of Interior Near-Reservation Service Areas
- Oklahoma Tribal Statistical Areas (OTSA)
- Congressionally Mandated Service Areas
- State Designated American Indian Statistical Areas (SDAISA)
- Tribal Designated Statistical Areas (TDSA)
- California Tribal Jurisdictional Areas per Federal Court Judgment
- Detailed Alaska Provisions

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Alaska Provisions

There are also special provisions for Alaska

- Hierarchy of Data Assignment (ANV, Regional Tribe, Regional Corporation)
- Alaska Native Villages
 - TDSA Established by 1990 Census or Current Alaska Native Village Statistical Areas (ANVSA)
 - Must not Substantially Exceed Actual Area of Village
 - Challenge Process Exists to use Census Geography that most Closely Approximates Area of Village
- Regional Corporations
 - Alaska Native Corporations Statistical Area

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Use Appendix B2 for Adding Formula Area under the Substantial Housing Services Provision

- Option 1: Affordable Housing Activities
 - Funded by any source
 - Provided to AIAN households =< 80% of median income
 - Valued at least 100% of increase in IHBG funding
- Option 2: Affordable Housing Activities
 - Funded by IHBG
 - Provided to AIAN households =< 80% of median income
 - Valued at least 51% of current IHBG allocation and
 - At least 51% of enrollment residing in area
 - Or at least 51% of AIAN in area is enrolled by Tribe
- Annual verification required

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Use Appendix C or Submit an agreement from all Tribes for overlapping formula areas

- Division of funds based on:
 - Proportional share of population in overlap area
 - Commitment to serve proportional share
 - Federally Recognized over State Recognized Up to Population Cap with State Tribe Getting Remaining Data.
- Method of division:
 - Tribes have 1st choice on data to use
 - HUD decides if Tribes do not agree on data using BIA Total Resident Service Area Indian Population (TRSAIP)
- Exception
 - Alaska Tribes seeking to expand areas not on list in areas,
 - And less than 50% of AIAN in area is enrolled by Tribe,
 - Then Tribe only gets demographics based on its own tribal membership

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Use Appendix D1 to report on Tribal Enrollment

- Tribal enrollment is NOT your AIAN number.
- Tribal enrollment is used to cap the population data at twice your Tribe's Tribal enrollment.
- Tribes that have an * next to their AIAN number on the FRF are pop capped and are now required to certify their enrollment number annually (if they don't send an updated number they are certifying that the number on the FRF is accurate).
- Some Tribes in overlaps choose to substitute tribal enrollment as the method of sharing Needs data instead of TRSAIP. This, however, requires an agreement from all of the Tribes in the overlap.

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Use Appendix D-2 to increase Population Cap

- Control to maintain fairness
- Only if AIAN persons > 2 x enrollment

If you wish to adjust your Tribe's population cap to a level greater than twice your Tribe's enrollment, please provide the information below and a brief narrative describing the programs.

A	B	C	D	
Tribal Enrollment	Total Number of AIAN Persons Served	Total Number of Tribal Members Served	Total Number of Members of Other Federally Recognized Tribes Served	Population Factor (C+D)/C (submit if Factor>2.0)

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Other Data Challenges

- Data provided by other agencies or HUD processes
 - Total Development Costs (TDC) – HUD ONAP
 - Fair Market Rents (FMR) – HUD PD&R
 - Total Resident Service Area Indian Population (TRSAIP) – BIA
 - U.S. Census Population Estimates – Census Bureau
 - Cannot challenge allowable expense levels (AEL)
- Tribes need to follow data correction processes
 - Specified by other agency
 - HUD office responsible for data

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Minimum Need Funding

- Minimum funding independent of participation year
- 0.007826 of appropriation
 - After set-asides
 - \$50,634 in FY 2021 Finals
 - \$60,417 in FY 2022 Finals
 - Must have FCAS funding < \$200,000
 - Must certify need in Indian Housing Plan

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Other Formula Adjustments!

Formula Current Assisted Stock (FCAS) Component ¹ :
Needs Component ² :
§1000.331 Phase Down Adjustments to Moderate Impact of Introduction of New Data Source ³ :
§1000.340(b) Adjustments to achieve FY 1996 Base Year Amount ⁴ :
Preliminary Current Year Allocation:
Adjustments for over- or under-funding in prior years ⁵ :
Initial Allocation:
§1000.342 Undisbursed Funds Adjustment ⁶ :
§1000.329 Minimum Allocation Adjustment ⁷ :
FY 2022 Final Allocation:

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Initial Allocation Amount

Initial Allocation Amount =

FCAS + Need + 1996 Minimum +
Adj for Prior Year Over/Under-Funding

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Undisbursed Funds Factor (24 CFR 1000.342)

- If Tribe has
 - Initial allocation \geq \$5 mil **AND**
 - Undisbursed IHBG grant amounts in LOCCS on Oct 1 of FY of current allocation > sum of prior 3 years' initial allocation
- Then Tribe's
 - Initial allocation will be adjusted down
 - By difference between Tribe's undisbursed grant amounts & sum of its prior 3-years' initial allocation
- If adjustment brings Tribe below FY 1996 Minimum, then allocated its FY 1996 minimum
- The amounts collected are redistributed proportionally to all Tribes not subject to UDFB and shown as a positive adjustment

Formula Current Assisted Stock (FCAS) Component ¹ :	
Needs Component ² :	
	\$1000.131 Phase Down Adjustments to Moderate Impact of Introduction of New Data Source ³ :
	\$1000.340(b) Adjustments to achieve FY 1996 Base Year Amount ⁴ :
Preliminary Current Year Allocation:	
Adjustments for over- or under-funding in prior years ⁵ :	
Initial Allocation:	
	\$1000.342 Undisbursed Funds Adjustment ⁶ : ←
	\$1000.329 Minimum Allocation Adjustment ⁷ :
FY 2022 Final Allocation:	

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Example

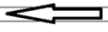
- Assumptions
 - This FY, Tribe's initial allocation > \$6 million
 - Tribe's 1996 Minimum = \$2 million
 - Last 3 FYs Tribe received \$5 million each year
 - LOCCS as of Oct 1 of this FY = \$20 million
- Calculations
 - Sum of last 3 years = \$15 million
 - Difference between LOCCS and prior 3 = \$5 million
 - Tribe's initial allocation – Difference = \$1 million
 - But, since \$1 mil < 1996 Minimum, Tribe gets \$2 million

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Minimum total allocation of carry-over funds (24 CFR 1000.329)

- Allocates up to \$3 mil in carry-over for min total allocations
- **If** Tribes certify (in IHP) eligible households **AND**
- Have allocations (after UDFR) < 0.011547% of appropriation (after set-asides);
- **Then** allocation adjusted upwards to 0.011547% appropriation (after set-asides) **OR**
- Lesser to stay within available carry-over held for this adjustment.
- In FY 2022, \$89,143

Formula Current Assisted Stock (FCAS) Component ¹	
Needs Component ²	
§1000.311 Phase Down Adjustments to Moderate Impact of Introduction of New Data Source ³	
§1000.340(b) Adjustments to achieve FY 1996 Base Year Amount ⁴	
Preliminary Current Year Allocation:	
Adjustments for over- or under-funding in prior years ⁵	
Initial Allocation:	
§1000.342 Undisbursed Funds Adjustment ⁶	
§1000.329 Minimum Allocation Adjustment ⁷	
FY 2022 Final Allocation:	



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