Office Hours: Indian Housing Plan (IHP)

July 30, 2026

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Office Hours Format

- Welcome and Introductions
- Housekeeping
- Overview and FAQs
- **Open Discussion**
- Wrap-up

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Welcome and Introductions

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Panelists

SME:

- Rob Jordan, Dare to Know LLC

Moderator:

- Mariel Trainum, FirstPic, Inc.

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Housekeeping

- Please mute your mic when not speaking to reduce background noise
- Submit questions using the chat or raise hand features
- Feel free to turn your camera on (optional)
- State your name and organization
- Limit detailed project-specific questions

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Overview and FAQs

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IHP Essentials — Why It Matters

- The IHP is your operational plan — not paperwork
- It is the front end of a compliance arc that closes with the APR
- It tells ONAP what you intend to do with IHBG funds, and binds you to it
- A well-built IHP reduces back-and-forth, audit risk, and monitoring findings
- Two framings — newer staff: use it as a checklist; experienced staff: use it as a risk map

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IHP Readiness Scorecard

A quick way to spot whether the IHP is ready for review or likely to bounce back.

1 Activities

Specific enough for ONAP to evaluate



2 Budget

Every source maps to a use



3 Timing

75-day submission window is protected



4 Governance

Tribal approvals and certifications are lined up



If any box is weak, use office hours to ask a specific fix-it question.

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IHP Compliance Arc

The IHP is the front end of the year-long compliance record.

1. Plan → 2. Budget → 3. Submit → 4. Operate → 5. Report

Watchpoints

- 75-day timing
- Complete activity detail
- Amend before changed spending

Evidence Trail

- Budget lines tie to activities
- Sources reconcile to uses
- APR follows the same logic

Decision Rule

- Material mid-year change?
- Update the IHP before funds move

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IHP Essentials – What the Rules Require

The short list of requirements that most often go wrong:

1. **Submission timing**: due to Area ONAP no later than 75 days before the tribal program year start
2. **Required content**: IHP form sections that must be complete
3. **Activity-level detail**: describing activities so ONAP can evaluate them
4. **Amendments**: required before spending IHBG on activity not in the approved IHP
5. **Certifications**: Tribal Council action, environmental, civil rights

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75-Day Submission Timeline

Work backward from the tribal program year start date.



Practical rule: do not discover missing approvals at T-75.

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IHP Budget – The Sources and Uses Framework

Every IHP budget is two ledgers that must reconcile:

1. **SOURCES** - where the money comes from; IHBG, carryover, program income, other
2. **USES** - what the money buys; eligible activities under NAHASDA §202

Total Sources = Total Uses, by program year - no orphan dollars on either side

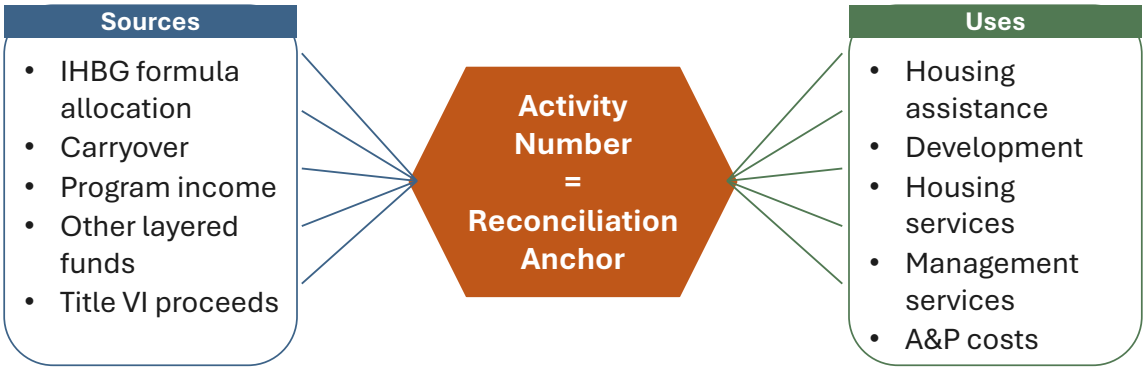
- The IHP budget table is the reconciliation document.
- Common monitoring finding – Sources are disclosed, but Uses are under-specified.

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Sources-to-Uses Budget Map

A clean budget shows where each dollar comes from and what activity it supports.



Build activity-by-activity, then assign sources: fewer orphan dollars, cleaner APR lines.

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IHP Budget – Sources of Funds

- **Federal sources:**
  - Current-year IHBG formula allocation
  - IHBG carryover
  - Program income and investment income
  - 1937 Act receipts
  - Title VI loan proceeds
- **Non-IHBG resources:**
  - Other federal funds
  - Tribal funds and non-federal match

Key reminder: disclose layered funds separately from IHBG.

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Funds Classification Matrix

Separate what counts as IHBG from what must be disclosed as layered support.

Funding Type	How to Treat It	Common Risk
IHBG carryover	IHBG source	Unassigned to a Use
Program income	IHBG-related source	Not mapped to an activity
Other federal funds	Layered, non-IHBG	Double-counted as IHBG
Tribal / match funds	Disclosed separately	Missing from full project picture

The budget can be layered. The accounting still has to be clean.

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IHP Budget – Uses of Funds

Eligible affordable housing uses under NAHASDA §202:
- Indian housing assistance
- Development
- Housing services
- Housing management services
- Crime prevention and safety
- Model activities approved by HUD
- Reserves within IHBG limits
- Administrative and planning (A&P)

Every Use line should map to an IHP activity and APR activity number.

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IHP Budget – Tying Sources to Uses

The reconciliation logic that makes the budget legible:

- Each Use line shows the Source(s) funding it
- Each Source is fully allocated to one or more Uses — no orphan dollars
- Activity numbers carry through: IHP narrative → IHP budget table → APR expenditures

Best practice: build the budget activity-by-activity, not source-by-source. The activity is the anchor that holds both ledgers together.

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IHP Budget – Administrative and Planning (A&P) Costs

- Administrative and Planning (A&P) is a separate Use category in the IHP budget:
  - Caps apply: 20% for grants over $500,000; 30% for grants at or below $500,000
  - Prior HUD approval is required to exceed the applicable cap
  - HUD monitors A&P ratios during IHP review, APR review, and monitoring visits
  - A&P includes administrative positions, planning, overhead, and approved indirect costs.
  - A&P does not include direct construction, tenant services, modernization, or maintenance crews.

Common audit finding: activity-delivery staff misclassified into A&P.

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A&P Classification Filter

Use these questions before placing staff time or costs in Administrative and Planning.

1	**Program administration, planning, or overhead?**	**Likely A&P**
2	**Direct construction, rehab, maintenance, or tenant service?**	**Activity delivery**
3	**Would it push the A&P ratio near the cap?**	**Flag for review**

Cap Reminder

20% over $500k; 30% at or below $500k

Audit Signal

Misclassified delivery staff can inflate A&P and trigger scrutiny

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IHP Budget – The IHP-to-APR Throughline

What you plan in the IHP is what you report against in the APR:
- **SOURCES** reconcile to APR receipts and balances
- **USES** carry through to APR expenditures
- Outputs and outcomes become APR performance measures

Mid-year amendments close the loop:
- If the activity shifts materially, amend before spending IHBG on the new activity
- Spending outside the approved IHP requires a formal amendment first

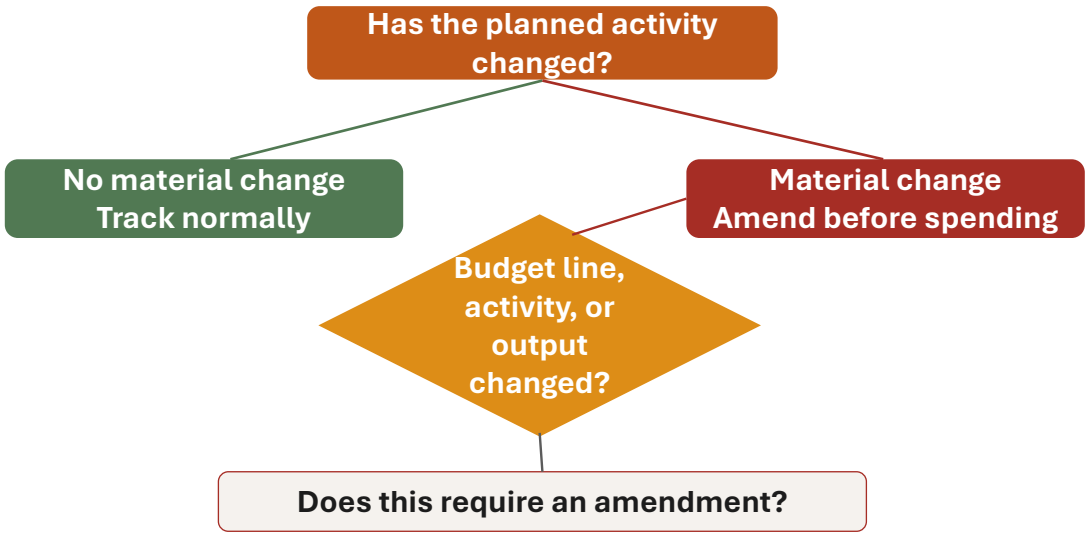
Today's session is the front end; the *August 17 APR Office Hours* is the back end.

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Amendment Decision Tree

When the work changes, decide before spending.



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IHP-to-APR Throughline

The APR should read like the closing chapter of the IHP, not a separate story.

IHP Activity	Budget Line	Spending Record	APR Output
Build / rehab units	Development use	Draws by activity	Units completed
Tenant services	Housing services	Service costs	Households served
Program admin	A&P use	Admin cost records	A&P ratio reported

Design test: every major IHP activity should have a budget line, spending trail, and APR result.

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Budget Checks and Authorities

Common Checks

- Program income assigned to a Use
- Carryover rolled into total Sources
- Activity numbers match narrative, budget, and APR
- Layered funds disclosed separately from IHBG
- A&P excludes direct program-delivery labor

Authorities

- NAHASDA §§202 and 208
- 24 CFR §§1000.26(a)(3), 1000.62, 1000.64
- 24 CFR §§1000.212, 1000.214, 1000.220, 1000.232
- 24 CFR §§1000.236–1000.240, 1000.512, 1000.514
- Form HUD-52737; PIH-2011-23; PIH-2025-01

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Open Discussion

Conversation starters:

- Foundational – what does the IHP actually require?
- Procedural – how do we handle timing, amendments, carryover?
- Strategic – how does the IHP drive multi-year programming?
- **Be specific**: your program year, your activity, your blocker.

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It's Your Turn!

How can we help you. What Questions do you have?

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Next Steps

- One-takeaway prompt: what is one thing you will check or change in your current IHP?
- Follow-up channel: questions captured in the session Google Doc will get a written response
- Register for the August 17 SWONAP APR Office Hours — the IHP and APR are two ends of one arc
- Contact: [FirstPic / Area ONAP follow-up contact]

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Closing

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