

## **Indian Housing Black Grant (IHBG) Formula Critical Deadlines and Frequently Asked Questions**

<b>Deadlines for IHBG Formula</b>	
August 1, 2024	Deadline to submit corrections to FY 2025 formula allocation estimates.
Winter 2024/ Spring 2025	Final FY 2025 IHBG allocations sent to eligible Tribes/Tribally Designed Housing Entities (TDHEs). Actual date is subject to announcement of FY 2025 funding.
TBD (see FAQ 6)	Deadline for filing a Census challenge for FY 2026.
June 1, 2025	FY 2026 formula allocation estimates sent to eligible Tribes/TDHEs on the Formula Response Form.

**Submission Information:** All corrections and challenges must be submitted to the IHBG Formula Customer Service Center. Submissions will be accepted by mail, fax, *or* email to the following:

### **IHBG Formula Customer Service Center**

101 Ridgely Avenue, Suite 10

Annapolis, MD 21401

e-mail: [IHBGformula@firstpic.org](mailto:IHBGformula@firstpic.org)

Toll Free Number: 1-800-410-8808

FAX: 202-393-6411

### **Frequently Asked Questions**

#### **Q1: Do I need to report changes on the Formula Response Form?**

A1: Yes. In accordance with 24 CFR § 1000.315, Tribes/TDHEs must report changes to information related to the IHBG formula on the Formula Response Form, including corrections to the number of Formula Current Assisted Stock (FCAS) units. Reporting these changes in your Indian Housing Plan (IHP) or Annual Performance Report (APR) is *not* sufficient.

#### **Q2: What happens if I misrepresent or fail to report FCAS information on the Formula Response Form?**

A2: If a Tribe/TDHE fails to report changes on the Formula Response Form in a timely manner and receives an over-payment based on ineligible units, the Tribe is required to repay the funds. A Tribe/TDHE will also not receive back-funding for any units that the Tribe/TDHE failed to report as eligible on the Formula Response Form in a timely manner. For FY 2025, this means Tribes must report by August 1, 2024.

#### **Q3: Where do I find more information regarding FCAS eligibility?**

A3: For more information on eligibility criteria for FCAS units in common situations, please refer to PIH Notice 2017-15, which can be found here <https://www.hud.gov/sites/documents/17-15PIHN.PDF>.

**Q4: Our Needs data is not reflecting our demographics. What can I do?**

A4: There are a few things you may be able to do to update your Needs data without submitting a Census Challenge. These include:

- 1) Reviewing your Formula Area to see if it adequately represents the geography in which you have historically provided housing services and are planning to continue to provide services in the future (see 24 CFR § 1000.302).
- 2) Checking to see if your population data has been capped (indicated by a ‘\*’ next to the American Indian and Alaska Native (AIAN) Persons variable under your Tribe’s Needs data). If your population data has been capped, it will reduce the counts for all of your Needs variables. In that case, check to see that your Tribal Enrollment figure is accurate.
- 3) If the population cap has been applied to your Tribe and you are providing housing services to more than twice as many AIAN members of other Tribes as members of your own Tribe, follow the instructions in Appendix D to raise your Tribe's Population Cap.

If your Formula Area, Tribal Enrollment, and Population cap numbers are all accurate, you may want to consider conducting a Census challenge for FY 2026 (See Question 5 below).

**Q5: What information is included in ‘Attachment A’?**

A5: As stated in PIH Notice 2017-14 (<https://www.hud.gov/sites/documents/PIH2017-14.PDF>), HUD provides Tribes their Needs data for the following Fiscal Year in Attachment A, so that they may decide whether or not to submit a Census challenge. The data in Attachment A provides counts before the population cap is applied. The guidelines for submitting Census challenges are included in the HUD document *Challenging U.S. Decennial Census Data: Guidelines for the Indian Housing Block Grant Formula* found here: <https://www.hud.gov/sites/dfiles/OCHCO/documents/4119Census.pdf>. You are strongly encouraged to contact the IHBG Formula Customer Service Center at the number above before you undertake a Census challenge. However, this fiscal year, Attachment A is not included as part of the Tribes’ Formula Response Form.

**Q6: Why is ‘Attachment A’ missing from the FY 2025 Formula Response Form?**

A6: HUD does not have the most recent American Community Survey data published by Census in a form that is needed to calculate the IHBG formula allocations. As a result, the FY 2026 Needs data will be published and distributed when it is available. To provide Tribes and TDHEs with a comparable amount of time as they had in prior fiscal years to review their data, HUD is considering issuing a waiver extending the deadline for submitting the FY 2026 Needs data challenges to a later date. Tribes and TDHEs will be notified should the waiver be issued.

**Q7: Where can I find more information about the IHBG Formula?**

A7: The regulations governing the formula can be found at [24 CFR Part 1000](#), Subpart D. In addition, PIH Notice 2017-16 <https://www.hud.gov/sites/documents/PIH2017-16.PDF> summarizes the most recent changes to the formula.