

HUD Indian Community Development Block Grant (ICDBG) CARES Act Imminent Threat Program

Kenaitze Indian Tribe (Kenaitze) is a federally recognized tribal government reorganized in 1971 under the Indian Reorganization Act of 1934, as amended for Alaska in 1936. The Tribe's service area comprises the communities of Kenai, Soldotna, Sterling, Nikiski, Salamatof, Ridgeway, Cohoe, Kalifornsky, Kasilof, Funny River, and Cooper Landing—a geographical area that spreads across more than 15,000 square miles of rural Alaska. Tribal facilities are located in Kenai, Alaska, near the ancestral fishing grounds of the Kahtnuht'ana Dena'ina (Kenaitze) people where the Kenai River empties into Cook Inlet. Kenaitze serves 1,684 Tribal members and approximately 4,410 Alaska Native/American Indian (AN/AI) residents of the central Kenai Peninsula; the total population living within this service area is approximately 35,943 people, most of whom are non-Native. The Kenaitze/Salamatof Tribally Designated Housing Entity ("the TDHE") was established in 1998 through a collaborative effort between Kenaitze Indian Tribe and Salamatof Tribal Council, pursuant to the Native American Housing Assistance and Self-Determination Act of 1996 (NAHASDA). The TDHE promotes development of affordable housing opportunities via new construction, rental assistance, home modernization and weatherization, and other affordable-housing activities for eligible AN/AI beneficiaries, serving a geographical area that includes residences from south of Cooper Landing to north of the Kasilof River.

a. Description of the activities to be undertaken

Additional support is necessary to help Kenaitze and Salamatof Tribal member households financially to remain in their homes and avoid becoming homeless due to eviction or foreclosure, or suffer unlivable conditions created by a suspension of utilities and/or a lack of food because of the ongoing COVID-19 National Emergency. While increases to IHBG formula allocations via the CARES Act have been instrumental in supporting households with rental, mortgage, utility, and/or other assistance payments in the near term, these funds are being quickly exhausted, and would benefit from additional monetary infusion from an ICDBG CARES Act "Imminent Threat" grant as the economic effects of the pandemic have dramatically increased the numbers of households seeking emergency assistance from the TDHE. In order to continue responding to the imminent threat to health and safety across the service area by enabling households to safely quarantine/shelter in place, the TDHE proposes extending the availability of emergency assistance payments to Kenaitze and Salamatof Tribal member heads of household age 18 and older living within the service area via the following distribution:

- rental/mortgage, utility, and/or food assistance payments in the amount of \$1000 per month for up to 450 Tribal households for up to two (2) months each (\$2000 per household, \$900,000 in total); and
- Tribal households awarded with a first distribution will be eligible to re-apply after two (2) months for a second distribution of any remaining funds.

Although the TDHE anticipates that most funds will be disbursed within the first six (6) months, proposed expenditures will be available through the end of the 12-month performance period or until funds are fully exhausted, whichever is soonest. These continued emergency assistance payments are necessary *to prevent* and *respond to* the dire financial effects of the COVID-19 pandemic in residences that are otherwise safe, livable, and appropriate for ongoing quarantine/shelter-in-place activities.

b. How grant-funded activities will be carried out

Kenaitze’s Facilities and Housing Director, Mr. Royal Brown, will be responsible for overseeing the Housing Program staff who will carry out grant-funded activities. Mr. Brown earned a Bachelor of Science degree in Finance from the University of South Florida in 1992 and has served Kenaitze in various roles since 2014. In prior and current roles, Mr. Brown has managed purchasing, acquisitions, capital projects, and large events; administers transitional and other TDHE-managed housing rentals; supervises various staff, including housing representatives, facility and maintenance crews; has worked closely with contractors and Tribal departments to ensure compliance with all local, state, and federal laws concerning contracts, procurement, and capital projects; and oversees construction and remodeling projects to their successful completion. Using an application process developed in response to IHBG funding made available through the CARES Act, prospective Kenaitze and Salamatof Tribal member heads of household age 18 and older living within the service area will be considered for emergency assistance payments by the Housing Representative/ROSS Coordinator (Sonja Barbaza) and/or the Housing Assistant (Velma Carroll), which includes the following steps:

- Applicant screening—Upon inquiry, Housing Program staff engage prospective applicants in either a telephonic or face-to-face discussion to determine emergency assistance and/or housing-related needs, with preliminary eligibility based on Tribal affiliation, status of their current housing situation, and affordability. Applicants who are screened-in as “Eligible” will be provided with a paper application to be completed and submitted to the TDHE’s Housing Representative/ROSS Coordinator or Assistant.
- Application completion—The application itself is a 1-page form that asks applicants to provide basic information about their identity (first and last name, physical and mailing addresses, telephone numbers, preferred email address), household composition, Tribal affiliation (Kenaitze or Salamatof only), and a checkbox for one of the following assistance options: Utilities, Food, Rental, Mortgage, or a combination of these. Applicants must also supply State-issued photo identification, birth certificates for minor children in the household, lease or mortgage statement, utility bill(s), and W9 from a qualified vendor (if the vendor is not already in the TDHE’s system).
- Application submission—Once completed, the application is hand-delivered to either the Housing Representative/ROSS Coordinator or Assistant and stamped as of the date of submission; applications are reviewed for completeness, and photocopies of all supportive documentation are included with the newly generated case file, which also includes all supplemental applications, correspondence, and a checklist with dates of items submitted. Applicants who meet the service area residency, Tribal affiliation, proof of household composition, and qualified vendor requirements will be determined as “Eligible” to receive funds under this ICDBG CARES Act “Imminent Threat” grant program.
- Internal submission of Accounting request—All necessary documentation is scanned, coded, and submitted by the Housing Representative/ROSS Coordinator or Assistant to Kenaitze’s Accounting Department using procurement management software called ReqLogic; all requisition requests such as emergency assistance payments are approved in ReqLogic by the Facilities and Housing Director. Once all documentation is received and the request is approved, Accounting Department staff process the request and a check is cut; depending on when in the week the approved request was received, checks are cut either the same week or early the following week.
- Check distribution—Accounting Department staff mail checks on behalf of approved applicants to each vendor recipient at the mailing address listed on the W9 included with the

original application materials; Accounting will also route copies of distributed checks to the Housing Program staff to be included in individual applicants' paper files.

- Electronic tracking—All approved and denied applications (including the reason for denial) are tracked by the Housing Representative/ROSS Coordinator and Assistant per fiscal year using Microsoft Excel for quarterly and end-of-year reporting to the TDHE Housing Board and HUD as requested.

Emergency assistance payments in the amount of \$1000 per month for two (2) months (\$2000 in total) will be disbursed on behalf of up to 450 eligible Kenaitze and Salamatof Tribal member heads of household age 18 and older living within the service area until the entirety of HUD ICDBG CARES Act “Imminent Threat” grant funds are expended or the 12-month performance period has elapsed, whichever is soonest. Each approved applicant household will be limited to receipt of an initial distribution of two (2) months of emergency assistance payments; after two (2) months, approved applicant households will be eligible to re-apply for a second distribution of any emergency assistance funds that may remain from the grant award.

c. Description of the implementation timeline

The following expanded description of the implementation timeline accompanies HUD form 4125:

- July 2020, Notice of Award (NOA)—Once the NOA from HUD is received, Kenaitze and the TDHE will take note of and respond to the “Special Conditions” that will need to be resolved before award funds are disbursed; likely these conditions will include the requirement to submit a Tribal Resolution attesting that the “Citizen Participation” requirements have been met, and authorizing the acceptance of HUD ICDBG CARES Act “Imminent Threat” grant funds.
- July 2020, Tribal Resolution—Kenaitze will submit to the Tribal Council draft text for a Resolution attesting that the “Citizen Participation” requirements have been met, and authorizing the acceptance of HUD ICDBG CARES Act “Imminent Threat” grant funds; if the Tribal Council approves, the Resolution is signed. The signed Resolution will be submitted to HUD in satisfaction of expected pre-award conditions.
- July–August 2020, Pre-award Application Period—Once the NOA from HUD is received, Kenaitze and the TDHE will begin to accept and prioritize applications during a pre-award period that will ensure funds are distributed according to the TDHE’s funding schema. Applications will be selected for award from eligible heads of household age 18 and older living within the service area via the following order of priority:
 1. Kenaitze and Salamatof Tribal elders disabled
 2. Kenaitze and Salamatof Tribal elders non-disabled
 3. Kenaitze and Salamatof Tribal members disabled
 4. All other Kenaitze and Salamatof Tribal member households
- August 2020, HUD Release of Funds—Once all pre-award conditions have been satisfied, HUD will issue a “Release of Funds” notice permitting Kenaitze and the TDHE to begin drawing down ICDBG CARES Act “Imminent Threat” grant funds.
- August 2020–June 2021, TDHE Administers Emergency Assistance Payments—Once Kenaitze and the TDHE are approved to begin drawing down ICDBG CARES Act “Imminent Threat” grant funds, the TDHE Housing Program will administer emergency assistance payments per the established order of priority to eligible Kenaitze and Salamatof Tribal member heads of household age 18 and older living within the service area until the entirety of

grant funds are expended or the 12-month performance period has elapsed, whichever is soonest. Tribal member heads of household awarded with a first distribution will be eligible to re-apply for a second distribution of any remaining grant funds after two (2) months.

- October 2020, January 2021, April 2021, July 2021, Quarterly reporting to TDHE Housing Board—Each quarter following the distribution of ICDBG CARES Act “Imminent Threat” grant funds via emergency assistance payments, the Facilities and Housing Director and Housing Representative/ROSS Coordinator will report on the level of funding disbursed, approved and denied applications (including the reason for denial), and any other pertinent trends and data to the TDHE Housing Board.
- July 2021, Final reporting to HUD—Once the entirety of ICDBG CARES Act “Imminent Threat” grant funds are expended or the 12-month performance period has elapsed, whichever is soonest, Kenaitze and the TDHE will submit final grant reporting to HUD and close out the grant in the Tribe’s Accounting systems.