U.S. Department of Housing and Urban Development

Procurement for PHAs

HUD OCI

Overview

PHA PROCUREMENT HANDBOOK 7460.8 REV 3 A Guide to Assist Public Housing Agencies on Procurement Practices

https://www.hud.gov/sites/default/files/documents/PHA-Procurement-Handbook.pdf

Procurement and Contract Requirements

PHAs must:

- Comply with 2 CFR 200.317-200.326. (substantially the same as 24 CFR 85.36, except for thresholds for micro/small purchases).
- Conduct transactions in a manner that provides, to the extent possible, full and open competition.
- A PHA must have its own Procurement Policy consistent with 2 CFR 200 and State law.
- A PHA must have written ethics standards and sanctions.
- Perform an independent cost estimate (ICE) for all procurements above small purchase threshold.

Procurement Handbook Chapters

1. Background
2. Procurement Authority & Administration of the Procurement Function
3. General Requirements
4. Ethics in Public Contracting
5. Informal Procurement Methods
6. Sealed Bids
7. Competitive Proposals
8. Noncompetitive Procurement
9. Specification
10. Miscellaneous Requirements
11. Contract Administration and Statements of Work
12. HUD Review Requirements
13. Waivers, Exceptions, Enforcement Discretion & Disaster
14. State, Local Laws, & Regulations Governing PHA Procurement
15. Cooperative Business Relationships
16. Employment & Training Opportunities & Contracting with Residents, Resident-Owned, Small, Minority, & Other Disadvantaged Businesses
17. Public/Private Partnerships & Mixed Finance Development
18. Utility Purchasing, Energy Conservation Loans, & Energy Performance Contracting

Helpful Aides in the Procurement Handbook

- Glossary of Procurement Terms
- Acronyms, Initialisms, and Abbreviations

Appendices

- **Appendix 1** – Definitions
- **Appendix 2** – Procurement Policy Guidance
- **Appendix 3** – Procurement Forms and Templates
- **Appendix 4** – Cost and Price Analysis Guidance
- **Appendix 5** – Independent Cost Estimates
- **Appendix 6** – Contract Clauses and Federal Requirements
- **Appendix 7** – Small Purchase Procedures
- **Appendix 8** – Sealed Bidding Procedures
- **Appendix 9** – Competitive Proposal Procedures
- **Appendix 10** – Noncompetitive Procurement Justifications

Introduction

Purpose of the Procurement Handbook

- Provides comprehensive procurement guidance for Public Housing Agencies (PHAs).
- Assists PHAs in complying with Federal procurement requirements, including **2 CFR Part 200** and HUD regulations.
- Promotes full and open competition, integrity, transparency, and accountability in procurement activities.
- Helps ensure Federal funds are spent efficiently, effectively, and in the best interests of residents and taxpayers.
- Establishes consistent procurement standards for goods, services, construction, and professional services.
- Provides practical tools, examples, templates, and best practices for procurement planning, solicitation, award, and contract administration.
- Supports PHAs in obtaining the best value while maintaining compliance with applicable laws and regulations.

What's New - Major Updates Since the 2007 Edition

- Aligned with 2 CFR Part 200 (Uniform Guidance) and current Federal procurement requirements.
- Updated procurement thresholds, including micro-purchase and simplified acquisition thresholds consistent with Federal standards.
- Increased focus on conflicts of interest, ethics, and procurement integrity.
- Expanded guidance on micro-purchases, small purchases, and purchasing cards.
- New and enhanced guidance on procurement planning and market research.
- Clarified requirements for independent cost estimates (ICEs) and cost/price analysis.
- Expanded guidance on professional services procurement, including A/E services.
- Enhanced discussion of contract administration, modifications, options, and performance monitoring.
- Updated treatment of Section 3, small businesses, and socioeconomic contracting considerations.
- New tools, examples, checklists, and best practices throughout the handbook.

Procurement Policy

PHAs are required to establish and follow a written procurement policy that is consistent with 2 CFR 200.317 through 200.327.

The PHA Board approves the procurement policy.

The Executive Director is responsible for ensuring procurement actions comply with the PHA's adopted procurement policy as well as with applicable federal, state, local, and territorial requirements.

A person with authority for procurement activities is referred to as the Contracting Officer when he/she performs that function, regardless of any other job or position title he/she may have.

10 Basic Procurement Steps

1. Develop a Specification or Statement of Work (SOW)
2. **Complete an Independent Cost Estimate (ICE)**
3. Determine rationale for procurement method
4. Solicit & receive quotes/bids/proposals
5. Determine responsive/responsible bidder, as applicable
6. **Determine price reasonableness (Cost vs. Price Analysis)**
7. Award contract
8. Implement contract administration system
9. Close out the contract
10. Maintain records for minimum of 3 years

Ethics

Ethics in Procurement

Code of Conduct

- PHAs must maintain written standards of conduct governing employees, officers, and agents involved in procurement.
- Procurement actions must be conducted impartially and ethically.
- Employees must avoid both actual conflicts and the appearance of conflicts.

Conflicts of Interest

- A conflict exists when an individual has a financial, personal, family, or organizational interest that could influence—or appear to influence—a procurement decision.
- Individuals with a conflict must not participate in the selection, award, or administration of a contract.
- Conflicts must be disclosed and addressed in accordance with PHA policies and applicable requirements.

Strictest Standard Applies

Procurement requirements may come from multiple sources, including:

- Federal statutes and regulations
- 2 CFR Part 200
- State and local laws
- PHA procurement policies

General Rule

- When requirements differ, the PHA should follow the **most restrictive applicable requirement**, unless a law or regulation specifically provides otherwise.

Ethics in Procurement Cont.

Gratuities

- Do not solicit or accept gifts, favors, entertainment, or anything of value from contractors, vendors, or prospective offerors.
- Even the appearance of improper influence should be avoided.

Kickbacks

- Kickbacks are strictly prohibited.
- No person may offer, solicit, accept, or receive anything of value in exchange for favorable procurement treatment.

Confidential Information

- Protect procurement-sensitive information before award.
- Do not disclose source selection information, proposals, evaluation results, or proprietary vendor data.
- Share information only with individuals who have an official need to know.

Methods of Procurement

Methods of Procurement

Method	Summary
Micro Purchase	Maximum $15,000, one quote permitted
Small Purchase	Maximum $350,000, typically three quotes
Sealed Bid	Typically for construction contracts over $350,000; contract awarded to the lowest bid. “IFB” used when only price is considered
Competitive Procedures	Request for Proposal (RFP) and Request for Qualifications (RFQ) procurements
RFP	Used when price and other factors are “considered”
RFQ	Used when price is not considered
Noncompetitive Procedures	Sole source solicitation after competitive process is deemed inadequate

Simplified Acquisition – Small Purchase

- Develop ICE and SOW - ICE is optional but recommended
- Solicit 3 Quotes
- Perform Price Analysis
- Execute Purchase Order/Contract (attach forms)
- Manage Contract

- Below the $350,000 Federal Simplified Acquisition Threshold or lower threshold as specified in the PHA's Procurement Policy.
- At least an adequate number (3 or more) of written quotes. Email and Fax are ok.
- PHAs may obtain equipment or supplies, or seek professional services typically obtained via the formal solicitation process.

Simplified Acquisition – Micro Purchase

What Is a Micro-Purchase?

- A procurement at or below the applicable **micro-purchase threshold**.
- Intended to reduce administrative burden for low-dollar purchases.

Key Requirements

- Competitive quotations are **not required** if the price is determined to be reasonable.
- Distribute purchases equitably among qualified suppliers when practicable.
- Avoid splitting purchases to stay below the threshold.
- Maintain documentation supporting the purchase and price reasonableness.

Prohibition Against Bid Splitting

Bid Splitting

- The intentional division of a procurement into smaller purchases to avoid applicable procurement requirements, competition requirements, or procurement thresholds.
- PHAs must consider the total anticipated value of a requirement when selecting the appropriate procurement method.

Exception

- The prohibition on bid splitting does not prevent a PHA from awarding micro-purchases to **Minority Business Enterprises (MBEs), Women-Owned Business Enterprises (WBEs), or Section 3 businesses**, as permitted under the micro-purchase rules.

Sealed Bids

- Develop ICE & Specifications for Bid
- Receive Bids-Open Publicly
- Determine Lowest Responsible and Responsive Bidder
- Execute Contract (attach forms)
- Manage Contract

- Construction contracts and purchase of commodities
- ICE is *more than* $350,000 Federal Simplified Acquisition Threshold or lower as specified in the PHA's Procurement Policy.
- Two or more bidders willing in the open market.
- Awarded on the basis of *price*
- Fixed-price contract.

IFB Package

An IFB Package Typically Includes:

- Instructions to Bidders
- Scope of Work, Specifications, and Drawings
- Bid Form and Pricing Schedule
- Contract Terms and Conditions
- Required Federal Clauses
- Wage Rate Requirements (if applicable)
- Bid Guarantee Requirements (if applicable)
- Section 3 and Other Applicable Requirements
- Submission Instructions and Bid Due Date

Method of Solicitation

1) Advertising in newspapers or other print mediums of local or general circulations. A sample advertisement is provided in Appendix 3.

2) Advertising in various trade journals or publications.

3) E-Procurement. PHAs may conduct their public procurements through the internet using eprocurement systems. However, all e-procurements must otherwise be compliant with 2 CFR 200.317 through 200.327, State and local requirements, and the PHA's own procurement policy. Steps must be taken to meet the requirements for full and open competition to avoid potential protests.

Competitive Proposals

- Develop ICE and SOW for Proposal
- Panel Rates and Ranks Submitted Proposals (do not open publicly)
- Develop Competitive Range or Choose Highest Rated Proposal
- Contracting Officer negotiates with competitors, including prices
- Award and Manage contract

- Two types of Competitive Procedures:
  - Price Considered during Evaluation.
  - Price Not Considered during Evaluation (A/E and Mixed Finance Development Partners).
- Project will be based on technical merits and price.
- Award will be made to the firm with the proposal that is most advantageous with price and other factors considered.

Evaluation of Competitive Proposal

The RFP must contain a clear statement of the evaluation factors to guide the offerors in structuring their proposal. Non-price factors are also called “technical factors.”

Where Price is Assigned an Explicit Point(s). Under this method, the PHA may award the price a specific number of points.

Evaluation Plan. An evaluation plan is an essential tool to ensure that proposals or qualifications are evaluated in a uniform and objective manner. Such a plan should be written and established for each procurement for the evaluation of technical and cost/price proposals before the RFP or RFQ.

When to use Non-Competitive Procurement

- Micro Purchase
- Competition is inadequate.
- PHA receives only one bid or proposal upon solicitiation
- Public exigency or emergency
- PHAs are required to submit proposed noncompetitive contracts in excess of the simplified acquisition threshold to HUD for pre-award review and approval

Intergovernmental Agreements

What Is an Intergovernmental Agreement?

- An agreement between a PHA and another Federal, State, Tribal, or local governmental entity to obtain goods, services, or other resources.

Key Features

- Allows PHAs to leverage existing governmental contracts, expertise, and resources.
- May reduce procurement costs and administrative burden.
- Can provide access to contracts that have already been competitively awarded.

Requirements

- The agreement must be in the PHA's best interest.
- The underlying contract or procurement must comply with applicable procurement requirements.
- The PHA remains responsible for ensuring the arrangement is properly documented and compliant.

Joint Venture Partners

What Is a Joint Venture Partnership?

- A joint venture partnership is a business arrangement in which a PHA and one or more public or private entities combine resources, share risks, and share rewards to carry out a specific project or business activity.

Key Requirements

- Must be permitted under applicable HUD requirements and state law.
- The arrangement must further the PHA's mission and be in the PHA's best interests.
- PHA officials and employees must comply with conflict-of-interest requirements.
- Any procurement conducted by the joint venture using Federal funds remains subject to applicable Federal procurement requirements.

Procurement Considerations

- Forming a joint venture is generally **not a procurement action**.
- However, contracts awarded by the PHA to create or support the joint venture may trigger procurement requirements.
- PHAs should clearly document the legal authority, business purpose, and ownership structure of the partnership.

Procurement Process & Contract Management

Specifications

Detailed description of materials, supplies, equipment, pre-cuts, or construction work that tells vendors what the PHA wants to procure.

Functional or Performance Specifications. These specifications describe the item's desired performance characteristics or identify how the item works.

Design Specifications. Design specifications describe the exact characteristics of the PHA's desired item.

Brand Name or Equal Specifications. Per 2 CFR 200.319(d)(1), PHAs must only use "brand name or equal" specifications in limited situations "when it is impractical or uneconomical to make a clear and accurate description of the technical requirements" for the item the PHA is seeking to procure. In these circumstances, PHAs may use a "brand name or equivalent" description to define the item's performance or other salient requirements that the item must satisfy to comply with the PHA's desired procurement.

Statement of Work (SOW)

Elements of the SOW.

- Detailed work and task requirements;
- End results and deliverables, including the criteria which a deliverable must meet to be acceptable;
- Delivery schedules/period of performance;
- Any reporting and compliance requirements;
- A precise statement of the work's objectives;
- Contact information for the PHA contact person/contract administrator; and
- Other special considerations (e.g., warranties, personnel and required classifications, testing procedures, and procedural safeguards).

Price and Cost Analysis

Price analysis

- performed when there is adequate competition.

Cost analysis

- performed when an absence of competition (e.g., sole source contracts) or where the PHA requires (e.g., competitive proposals contracts) to facilitate price negotiation.
- Labor
- Materials
- General and Administrative Costs
- Owner Overhead
- Profit

Independent Cost Estimate ICE

What Is an ICE?

- An Independent Cost Estimate (ICE) is the PHA's estimate of the anticipated cost of a procurement, prepared **before** receiving bids or proposals.
- Supports procurement planning.
- Helps determine funding availability.
- Assists in evaluating price reasonableness.
- Serves as a benchmark during contract negotiations and award.

Key Requirements

- Must be prepared by **PHA staff or an independent consultant acting on behalf of the PHA**. **May not be prepared by a vendor, contractor, or prospective offeror that will compete for or perform the work.**
- Must be prepared before soliciting bids or proposals.
- Must be based on reasonable and supportable information.
- Should be documented in the procurement file.

Common Sources

- Historical prices
- Market research
- Published price lists
- Cost estimating guides
- Professional estimates

Contract Types

Firm-Fixed-Price (FFP) – Contractor performs the work for a set price. Contractor bears the risk of cost overruns. Preferred when requirements are well-defined.

Fixed-Price with Economic Price Adjustment (FPEPA) – Fixed-price contract that allows price adjustments based on specified economic factors, such as inflation or commodity price changes.

Fixed-Price Incentive – Fixed-price contract that includes incentives tied to cost, schedule, or performance objectives.

Cost-Reimbursement – Contractor is reimbursed for allowable costs incurred in performing the work. Used when costs cannot be estimated with sufficient certainty.

Cost-Plus-Fixed-Fee (CPFF) – Cost-reimbursement contract that provides a negotiated fixed fee that does not vary based on actual costs incurred.

Time-and-Materials (T&M) – Contractor is paid fixed labor rates for hours worked plus the cost of materials. Appropriate only when the scope cannot be accurately estimated.

Labor-Hour – Similar to a T&M contract, but payment is limited to labor hours at fixed rates and does not include materials.

Indefinite Delivery Contract (IDC) – Establishes a contractual framework for future orders when the timing or quantity of work is uncertain.

Indefinite Delivery/Indefinite Quantity (IDIQ) – Provides for an indefinite quantity of supplies or services during a fixed period, with work ordered as needed.

Requirements Contract – Contractor agrees to fulfill all actual requirements for specified supplies or services during the contract period.

Definite-Quantity Contract – Provides for a specific quantity of supplies or services to be delivered during a specified period.

Mandatory Contract Clauses

Mandatory Requirements for Construction/Development Contracts Greater than $350,000*. PHAs must incorporate the clauses contained in form HUD-5370, General Conditions of the Contract for Construction, and the applicable Davis-Bacon wage decision.

Mandatory Requirements for Non-Construction Contracts (Without Maintenance Work) Greater than $350,000*. PHAs must incorporate the clauses contained in Section I of form HUD5370-C, General Conditions for Non-Construction Contracts.

Mandatory Requirements for Maintenance Contracts (including Non-Routine Maintenance Work) Greater than $350,000*. PHAs must incorporate the clauses contained in Sections I and II of Form HUD-5370-C, General Conditions for Non-Construction Contracts.

Wage Rates

Davis-Bacon	HUD-Determined Prevailing Wage
Davis-Bacon and Related Acts require payment of prevailing wage rates and benefits as determined by the Department of Labor (DOL) on federally-financed or assisted construction.	Contracts for certain professional services are excluded from coverage by HUD-determined prevailing wage rates, including contracts for inspections and service or maintenance of leased equipment, fixtures, or appliances.
Except for non-routine maintenance work, for all construction contracts exceeding $2,000.	All maintenance (routine and non-routine) contracts in excess of $2,000.
Includes both on-site and off-site work.	

Section 3

What Is Section 3?

- Section 3 requires recipients of certain HUD financial assistance to direct employment, training, contracting, and other economic opportunities to low- and very low-income persons and eligible businesses.

Key Requirements

- Consider Section 3 requirements when planning procurements and contracting activities.
- Provide opportunities for eligible workers and Section 3 businesses to participate in HUD-funded projects.
- Maintain records demonstrating compliance and reporting, as applicable.

Resident-Owned Businesses and RMC

Resident-Owned Businesses

- PHAs are encouraged to provide contracting opportunities to qualified resident-owned businesses, consistent with applicable procurement requirements.
- Resident-owned businesses may also qualify as Section 3 business concerns.

Resident Management Corporations (RMCs)

- An RMC is a resident organization that has entered into a management agreement with a PHA to perform management functions at a public housing development.
- PHAs may contract with RMCs in accordance with HUD requirements and applicable procurement standards.

Construction Contract Administration

Contractor is responsible for completing work within contractually required timeframes

PHA responsible for monitoring contractor to ensure work is completed as scheduled, on budget, and within acceptable quality standards

Monitoring and Inspections

Pre-construction Conference

- Discuss all key construction and contract administration issues
- Issue a “Notice to Proceed” that includes start date and expected completion date
- May address mobilization, if appropriate

Progress Meetings

- Regularly occurring meetings
- Discuss progress, delays, payments, etc.

Inspections

- PHA responsible for ensuring regular inspections of work are completed
- May be completed by a qualified third party (e.g., retained architect; retained construction manager)
- “Inspection Report” must be completed for each inspection to document results, address payments for work completed, and record identified deficiencies

Payments

PHA responsible for making progress payments to contractor based

PHA may authorize justifiable time extensions • HUD approval is not necessary unless PHA is subject to HUD– established threshold less than requested amounton approved schedule

Final Payment

- Documents to be submitted for final payment:
- Certificate of Occupancy (if applicable)
- Contractor's release certification (notarized) that indicates:
  - Work completed in accordance with construction documents
  - Total amount due the contractor and separately stated amount for each unsettled claim against the PHA
  - PHA is released of all claims
  - Wages paid—no outstanding claims for unpaid wages
  - All guarantees and warranties assigned to PHA

Change Order

Change orders should include

- the number of the modification,
- a brief description of the change,
- the cost of the modification (increase or decrease),
- the date submitted to HUD for approval, if applicable,
- any critical deadline dates,
- the date of HUD approval or disapproval, if applicable, and
- the amount of additional time required by the contractor to fulfill the terms of the modification, if any.

PHAs must make available to HUD any proposed contract modifications that change the scope of the contract or increase the contract by more than the simplified acquisition threshold.

Completion of Work

Notification

Contractor will provide written notification to PHA when all work is complete •

Final Inspection

PHA should conduct final inspection of all work within 10 days of receiving written notification of completion

HUD Review Requirements

Chapter 12

Require HUD Approval

A. Noncompetitive procurements expected to exceed the Federal simplified acquisition threshold (2 CFR 200.325(b) (2));

B. Brand name-only procurements expected to exceed the Federal simplified acquisition threshold (2 CFR 200.325 (b)(3));

C. Awards over the Federal simplified acquisition threshold to other than the apparent low bidder under a sealed bid (2 CFR 200.325(b)(4));

D. Proposed contract modifications that change the scope of the contract (as per the "Changes" clause in Forms HUD-5370, HUD-5370-C, or HUD-5370-EZ) or increasing the contract amount by more than the Federal simplified acquisition threshold (2 CFR 200.325(b)(5));

E. Use of the qualification-based selection (QBS) method of procurement for other than A/E services, joint venture partners or developers, or energy service contracts;

F. For PHAs operating under the 1969 public housing ACC 53010 and 53011, any agreement or contract for professional, management, fee accountants, legal, or other professional services with any person or firm if the total period or term of the contract, including renewal option provisions, exceeds two years;

Require HUD Approval cont

G. Procurements for legal or other non-personal services in connection with litigation, per HUD's Litigation Handbook, that exceed $100,000;

H. Procurements that exceed the amount included in: (1) the HUD-approved Development Cost Budget or (2) where HUD has required prior approval on a Notice of Deficiency or corrective action order under the Capital Fund Program;

I. Contracts that exceed five years, including options. To approve terms of more than five years, HUD must determine there is no practical alternative;

J. PHAs operating under the 1969 public housing ACC who enter into a transaction with any joint venture, affiliate, or other identity-of-interest entity. Section 515 of the 1969 public housing ACC specifies that such transactions must comply with the conflict of interest provisions that apply to the PHA. PHAs and their instrumentalities operating under the 1995 or 2023 public housing ACCs must comply with the conflict of interest provisions under the ACC;

K. Solicitations, and any resulting contracts, related to energy performance contracting and utility add-ons, as per Chapter 18 of this Handbook; and

L. Solicitation and contracts by any PHA whose procurement procedures or operations fail to comply with the procurement standards in 2 CFR 200.317-327

Development

A/E contracts, fee appraiser contracts, development manager contracts, construction solicitations, construction contracts, and contract modifications.

Require HUD Approval cont

Exemptions

- The PHA requests, and HUD subsequently certifies, that its procurement system be reviewed by HUD to determine if its systems meet the standards under 2 CFR 200.317-327 and the essential requirements of this Handbook and HUD Handbook 7485.1 (2 CFR 200.325(c)(1)); or
- The PHA self-certifies that its procurement system meets the standards under 2 CFR 200.317- 327 and the essential requirements of this Handbook and HUD Handbook 7485.1 (2 CFR 200.325(c)(2)). However, this certification does not limit HUD's right to review the PHA's procurement policy.
- Exemptions are granted for a one-year period and may be automatically renewed each year unless the PHA is found not to be in compliance with 2 CFR 200.317-327 or the PHA requests that the exemption be rescinded.

Waivers

When a PHA is going to take an action noncompliant with procurement regulations and wishes to be granted a waiver of a HUD regulation or an exception of a 2 CFR Part 200 regulation, they must submit a waiver or exception request.

The PIH Assistant Secretary or the official with delegated authority either approves or denies the request and informs the HUD field office that received the request of the decision. The HUD field office then informs the PHA of the decision in writing.

Not less than quarterly, the Secretary must notify the public of all waivers and exceptions of regulations that HUD has approved, by publishing a notice in the Federal Register.

Procurement File Checklist

Item	Micro-Purchase	Simplified Acquisitions	Sealed Bid	Competitive Proposals	Non-Competitive Proposals
Pre-Solicitation					
Independent Cost Estimate					
Individual Procurement Plan					
Rationale for Contract Method (if not apparent)					
Rationale for Contract Type (if not apparent)					
Evaluation Plan					
Solicitation					
Sources (mailing lists, advertisements, etc.)					
Solicitation Notice and Amendments					
IFB/RFP					
Notes of Pre-Bid/Proposal Conferences					
IFB/RFP Correspondences					
Record of Bids/RFPs Requested					
Quotes, Bids or Proposals Received					
Justification for Other than Full/Open Competition					

Procurement File Checklist cont

Item	Micro-Purchase	Simplified Acquisitions	Sealed Bid	Competitive Proposals	Non-Competitive Proposals
Evaluation					
Bid Opening					
Evaluation Panel Disclosures and Ethics Statement					
Technical Evaluation					
Price Evaluation					
Competitive Range Determinations					
Evaluation Report					
Memo of Negotiation and Selection Decision					
Pre-award Survey and Responsibility Determinations					
Award					
Contract and Award Documents					
Notification to Unsuccessful Bidders					
Appeals (all correspondence)					
Post-Award and Contract Administration					
Insurance and Bonding Requirements					
Records of Post-Award Conferences					
Notice to Proceed					
Contract Modifications and Supporting Documentation					
Receiving Reports					
General Contract Correspondence					
Payment Record/Documentation					
Inspections and Field Reports					
Completion Certificate					

Thank you!

Next session we will go into more eligibility detail.

Thank you!

Questions

- Time for questions!
- If you think of any after this training, email:
- PIHOCI@hud.gov

- Additional Trainings can be found here: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/capfund/learningtools