

# Paperwork Reduction Act Submission

Please read the instruction before completing this form. For additional forms or assistance in completing this forms, contact your agency's Paperwork Reduction Officer. Send two copies of this form, the collection instrument to be reviewed, the Supporting Statement, and any additional documentation to: Office of Information and Regulatory Affairs, Office of Management and Budget, Docket Library, Room 10102, 725 Seventeenth St. NW, Washington, DC 20503.

1. Agency/Subagency Originating Request: <b>U.S. Department of Housing and Urban Development</b> Office of Native American Programs	2. OMB Control Number: a. <b>2577</b> b. <input checked="" type="checkbox"/> None
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3. Type of information collection: (check one) a. <input checked="" type="checkbox"/> New Collection b. <input type="checkbox"/> Revision of a currently approved collection c. <input type="checkbox"/> Extension of a currently approved collection d. <input type="checkbox"/> Reinstatement, <b>without change</b> , of previously approved collection for which approval has expired e. <input type="checkbox"/> Reinstatement, <b>with change</b> , of previously approved collection for which approval has expired f. <input type="checkbox"/> Existing collection in use without an OMB control number For b-f, note item A2 of Supporting Statement instructions.	4. Type of review requested: (check one) a. <input checked="" type="checkbox"/> Regular b. <input type="checkbox"/> Emergency - Approval requested by c. <input type="checkbox"/> Delegated 5. Small entities: Will this information collection have a significant economic impact on a substantial number of small entities? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No 6. Requested expiration date: a. <input checked="" type="checkbox"/> Three years from approval date    b. <input type="checkbox"/> Other (specify)
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7. Title:  
**Indian Housing Operating Cost Study**

8. Agency form number(s): (if applicable)  
 None

9. Keywords:  
 Housing; Low and moderate income housing

10. Abstract:  
 This is a collection of cost data on the costs of operating housing developed by Indian Housing Authorities under provisions or the Housing Act of 1937 and an examination of how these data reflect location differences for the continued operation of this housing. The collected cost data will be used to analyze the AEL factor in the current Indian Housing Block Grant formula.

11. Affected public: (mark primary with "P" and all others that apply with "X") a. Individuals or households    e. Farms b. Business or other for-profit    f. Federal Government c. Not-for-profit institutions    g. <b>P</b> State, Local or Tribal Government	12. Obligation to respond: (mark primary with "P" and all others that apply with "X") a. <b>P</b> Voluntary b. Required to obtain or retain benefits c. Mandatory
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13. Annual reporting and recordkeeping hour burden: <table style="width:100%; border-collapse: collapse;"> <tr><td>a. Number of respondents</td><td style="text-align: right;">261</td></tr> <tr><td>b. Total annual responses</td><td style="text-align: right;">255</td></tr> <tr><td>  Percentage of these responses collected electronically</td><td style="text-align: right;">15%</td></tr> <tr><td>c. Total annual hours requested</td><td style="text-align: right;">975</td></tr> <tr><td>d. Current OMB inventory</td><td style="text-align: right;">0</td></tr> <tr><td>e. Difference (+,-)</td><td style="text-align: right;">+975</td></tr> <tr><td>f. Explanation of difference:</td><td></td></tr> <tr><td>  1. Program change:</td><td style="text-align: right;">+975</td></tr> <tr><td>  2. Adjustment:</td><td style="text-align: right;">0</td></tr> </table>	a. Number of respondents	261	b. Total annual responses	255	Percentage of these responses collected electronically	15%	c. Total annual hours requested	975	d. Current OMB inventory	0	e. Difference (+,-)	+975	f. Explanation of difference:		1. Program change:	+975	2. Adjustment:	0	14. Annual reporting and recordkeeping cost burden: (in thousands of dollars) <table style="width:100%; border-collapse: collapse;"> <tr><td>a. Total annualized capital/startup costs</td><td style="text-align: right;">\$0</td></tr> <tr><td>b. Total annual costs (O&amp;M)</td><td style="text-align: right;">0</td></tr> <tr><td>c. Total annualized cost requested</td><td style="text-align: right;">\$0</td></tr> <tr><td>d. Current OMB inventory</td><td style="text-align: right;">0</td></tr> <tr><td>e. Difference</td><td style="text-align: right;">\$0</td></tr> <tr><td>f. Explanation of difference:</td><td></td></tr> <tr><td>  1. Program change:</td><td style="text-align: right;">0</td></tr> <tr><td>  2. Adjustment:</td><td style="text-align: right;">\$0</td></tr> </table>	a. Total annualized capital/startup costs	\$0	b. Total annual costs (O&M)	0	c. Total annualized cost requested	\$0	d. Current OMB inventory	0	e. Difference	\$0	f. Explanation of difference:		1. Program change:	0	2. Adjustment:	\$0
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15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X") a. Application for benefits    e. <b>P</b> Program planning or management b. <b>X</b> Program evaluation    f. <b>X</b> Research c. <b>X</b> General purpose statistics    g. Regulatory or compliance d. Audit	16. Frequency of recordkeeping or reporting: (check all that apply) a. <input type="checkbox"/> Recordkeeping    b. <input type="checkbox"/> Third party disclosure c. <input checked="" type="checkbox"/> Reporting: 1. <b>X</b> On occasion    2. <input type="checkbox"/> Weekly    3. <input type="checkbox"/> Monthly 4. <input type="checkbox"/> Quarterly    5. <input type="checkbox"/> Semi-annually    6. <input type="checkbox"/> Annually 7. <input type="checkbox"/> Biennially    8. <input type="checkbox"/> Other (describe)
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17. Statistical methods: Does this information collection employ statistical methods? <input type="checkbox"/> Yes <b>X</b> No	18. Agency contact: (person who can best answer questions regarding the content of this submission) Name: <b>Randall R. Akers</b> Phone: <b>303- 672-5465</b>
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## 19. Certification for Paperwork Reduction Act Submissions

On behalf of this Federal Agency, I certify that the collection of information encompassed by this request complies with 5 CFR 1320.9.

**Note:** The text of 5 CFR 1320.9, and the related provisions of 5 CFR 1320/8(b)(3). Appear at the end of the instructions. The certification is to be made with reference to those regulatory provisions as set forth in the instructions.

The following is a summary of the topics, regarding the proposed collections of information, that the certification covers:

- (a) It is necessary for the proper performance of agency functions;
- (b) It avoids unnecessary duplication;
- (c) It reduces burden on small entities;
- (d) It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
- (e) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- (f) It indicates the retention periods for recordkeeping requirements;
- (g) It informs respondents of the information called for under 5 CFR 1320.8(b)(3):
  - (i) Why the information is being collected;
  - (ii) Use of the information;
  - (iii) burden estimate;
  - (iv) Nature of response (voluntary, required for a benefit, or mandatory);
  - (v) Nature and extent of confidentiality; and
  - (vi) Need to display currently valid OMB control number;
- (h) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to collected (see note in item 19 of the instructions);
- (i) It uses effective and efficient statistical survey methodology; and
- (j) It makes appropriate use of information technology.

If you are unable to certify compliance with any of these provisions, identify the item below and explain the reason in item 18 of the Supporting Statement.

Signature of Program Official:

X

Date:

Signature of Senior Officer or Designee:

X  
Lillian L. Deitzer, Departmental Reports Management Officer  
Office of Investment Strategies, Policy, and Management, Office of the Chief Information Officer

Date:

# Supporting Statement for Paperwork Reduction Act Submissions

## A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

Congress passed Public Law 104-330, the Native American Housing Assistance and Self-Determination Act (NAHASDA) in 1996 and the NAHASDA Reauthorization Act of 2002 (Public Law 107-292). NAHASDA reorganized how Federal housing assistance is provided to low income Native Americans by eliminating programs of the 1937 Housing Act and replacing them with a single block grant program, the Indian Housing Block Grant (IHBG) program. The regulations and the formula for the IHBG program were developed through a Negotiated Rulemaking process as authorized by the Administrative Procedures Act (5 USC 4111, 4112).

NAHASDA requires that participating Tribes and Tribally Designated Housing Entities (TDHEs) “protect and maintain the viability of the housing owned and operated by the recipient and that was developed under a contract between the Secretary and an Indian housing authority pursuant to the United States Housing Act of 1937” (Title I, Section 102 (D)). NAHASDA also requires that the federal amount provided in each fiscal year for each Indian tribe for which operating or modernization assistance was provided in Fiscal Year (FY) 1996 shall not be less than the total amount provided for the tribe for FY 1996. (Title 3, Section 301 (d)).

Negotiated Rulemaking resulted in the IHBG formula and associated regulations for the allocation of funds to Tribes/TDHEs and the publication of these regulations at 24 CFR 1000 Subpart D (Federal Register / Vol. 63, No. 48 / Thursday, March 12, 1998). The IHBG formula uses the fiscal year (FY) 1996 national average operating subsidy, adjusted for inflation and local area costs, as the basis for per unit funding to an Indian tribe to operate housing developed under 1937 Housing Act. The cost adjustment for each Tribe/TDHE uses either the Tribe’s FY 1996 Allowable Expense Level (AEL) as a proportion of the 1996 national average AEL or the Tribe’s current year 2-bedroom Fair Market Rent (FMR) as a proportion of the current year national average FMR. The formula selects whichever is greater for each Tribe/TDHE.

In 2001 HUD announced a new Negotiated Rulemaking committee for the purpose of negotiating changes to the allocation formula used under the IHBG Program (Federal Register / Vol. 66, No. 136 / Monday, July 16, 2001). The committee was to provide Indian tribal governments the opportunity to have input into any changes determined to be necessary to improve the distribution of funds under the IHBG Program. The Negotiated Rulemaking Committee held several meetings from April 2003 to February 2006. These sessions included discussion about the validity of AEL data and its use as an adjustment factor in the IHBG formula for funding the operation of housing units developed under the 1937 Act programs.

The minutes of the Negotiated Rulemaking Committee reveal that the AEL was discussed during several committee meetings. The sixth meeting of the Formula Negotiated Rulemaking Committee held January 13 – 16, 2004, included discussion about the costs of operating 1937 Act affordable housing programs in Indian Country. Many committee members felt that the use of AEL data in determining the operating subsidy portion of the IHBG grant did not adequately recognize the real cost of operating housing in Indian country and that the AEL values needed to be replaced with more realistic figures. Assistant Secretary (A/S) Liu responded that the goal of HUD was to work with tribes to come up with something that removes AEL as an adjustment factor in the IHBG formula. However, AEL should not be replaced on an ad hoc basis through appeals. A/S Liu stated that HUD has made a commitment to start the process and was beginning to allocate funds to collect data to replace AEL, and that HUD is committed to identifying real costs.

This information collection is necessary to follow-up on questions that arose during negotiated rulemaking about the costs of operating 1937 Act affordable housing programs in Indian Country. There is no current database which contains this information. This is a collection of cost data on the costs of operating housing developed by Indian Housing Authorities under provisions of the Housing Act of 1937 and an examination of how these data reflect location differences in costs for the continued operation of this housing. The collected cost data will be used to analyze the AEL factor in the current IHBG formula.

2. Indicate how, by whom and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

Data will be used by HUD’s Office of Native American Programs, by future Negotiated Rulemaking Committees, and by individual Tribes/TDHEs to understand the current costs of operating 1937 Act housing units and the factors, such as energy consumption, that contribute to variation among Tribes and regions.

The proposed information collection requests, from each Tribe/TDHE with housing developed under provisions of the Housing Act of 1937, expenditures for a list of housing operating cost categories for three Fiscal Years (2002 through 2004) (See **Attachment A: Cost Categories for Indian Housing Operating Cost Study**, and **Attachment B: Cost Category Definitions**). The proposed information collection also requests respondents to discuss local factors that affect costs, e.g. remote location, energy resources and unit conditions.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Multiple strategies will be used to collect cost information.

The Executive Director of each housing entity will be contacted initially and asked for existing records that describe the costs of operating 1937 Act housing units. Annual statements, financial statements, reports to a Board of Commissioners, trial balances, and similar records may provide the basis for understanding costs. This information may be submitted by postal service, electronic format, or during site visits. Based upon other data collections, the limited availability of broadband Internet service in Indian Country, and similar factors **we expect 15% of the collection to be submitted electronically**. Letters and calls requesting these documents will provide information about the voluntary nature of the request and the OMB Paperwork Reduction Act clearance. (See **Attachment C: Telephone Contact and Letter Contact**, for the OMB disclosure to be included in the Standard Request Letter or telephone call.) Pilot test results have found that these records will generally have to be discussed with the Tribe/TDHE Executive Director, Chief Financial Officer. These discussions can occur by phone, email, or during a site visit.

Some Tribes/TDHEs may request a format for use in electronically submitting information about 1937 act unit operating costs and cost factors. A spreadsheet format will be available (See **Attachment D: Spreadsheet Format for Operating Costs for 1937 Act Units**). This will be emailed to the Tribe/TDHE. If email is not available the Tribe/TDHE will be mailed a disk. The project website (<http://www.indianhousingcosts.org>) will also provide access to the spreadsheet format. The spreadsheet format can be returned electronically or by email. Because not all Tribes and TDHEs organize their housing expenditures data in the same format, data collection for this study cannot be fully automated. We expect a need to discuss some responses in every submission with the staff of the Tribe/TDHE.

Site visits to representative Tribes/TDHEs will be another strategy used to collect cost information. During site visits observations of selected 1937 Act housing units will assess conditions affecting operating costs. These observations may lead to discussion of attributes of the home. See **Attachment E: Resident Contact for Home Observation** for the OMB disclosure to be given out and reviewed with the resident at the beginning of all Home Evaluations.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

This information is not collected elsewhere. Reporting forms currently in use, the Annual Performance Report (APR) and the Indian Housing Plan (IHP), were evaluated to see if currently collected data would be appropriate for the purposes of this study. The data collected by these forms is inappropriate for this study. The IHP does not collect operating cost data, while the operating cost data collected by the APR does not collect sufficient detail for the purposes of this study.

Information similar to the requested cost information was collected prior to the enactment of NAHASDA. However, NAHASDA removed this reporting requirement after FY 1997. Current information about Tribal housing is necessary to achieve the two purpose of this research: to study the real and current costs of operating affordable housing programs in Indian Country and to analyze the AEL adjustment factor. While individual TDHEs continue to keep financial records regarding the costs of operating housing, there is no standardized form or process for collecting that information. This study will attempt to do that, for a one-time data collection. Any data already submitted to HUD will not be requested again.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I) describe any methods used to minimize burden.

No impact.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If data are not collected there will continue to be a lack of current information for HUD and Tribes/TDHEs to use in reconsidering the AEL factor in the Formula Current Assisted Stock (FCAS) portion of the Indian Housing Block Grant (IHBG) formula.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
  - requiring respondents to report information to the agency more than quarterly;
  - requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
  - requiring respondents to submit more than an original and two copies of any document;
  - requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
  - in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;
  - requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

No special circumstances exist.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.
  - Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping disclosure, or reporting format (if any) and the data elements to be recorded, disclosed, or reported.
  - Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that preclude consultation in a specific situation. These circumstances should be explained.

As required by **5 CFR 1320.8** a notification of intention was published in the **Federal Register** on April 12, 2005, as **Indian Housing Operating Costs Survey (Docket No. FR-4978-N-03)**. HUD received one response to this notification. The Tribe/TDHE making the response stated that they believed there was no need for the study and that HUD was the only participant to the Negotiated Rulemaking that expressed an interest in reviewing AEL data. The Tribe/TDHE making the response also stated that the use of AEL as a geographic location factor was validated by the Negotiated Rulemaking Committee. Finally, they questioned what data and methods would be used. HUD believes that the minutes and activities of the Negotiated Rulemaking Committee show that HUD was not the only participant interested in the AEL data used as a location factor. HUD responded to the comment received. A copy of the comment and response is attached.

HUD has sought to consult with Tribes/TDHEs and interested individuals . This has included 1) a mailing to all Tribes/TDHEs describing the intent of the study and the need for discussion, 2) attending meetings of Indian housing associations in all ONAP regions, 3) providing a toll-free telephone to facilitate responding to questions and concerns, 4) providing a website to describe the project and all comments to be placed on an electronic bulletin board, 5) meeting with staff of individual Tribes/TDHEs to discuss the intent of the study, and 6) pilot testing of specific procedures with nine Tribes/TDHEs covering all ONAP regions.

9. Explain any decision to provide any payment or gift to respondents, other than reenumeration of contractors or grantees.

There will be no payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation or agency policy.
 

Respondents from individual Tribes/TDHEs will be assured of the confidentiality and anonymity of their individual opinions expressed during any discussion. If potential respondents have questions or concerns about the information sought, or how it will be used, they will be given a contact name and toll-free number to call as well as an email address for contact. The project website location ([www.indianhousingcosts.org](http://www.indianhousingcosts.org)) will be provided; it also has information about the study.
11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No such information is being sought.

12. Provide estimates of the hour burden of the collection of information. The statement should:
  - indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally estimates should not include burden hours for customary and usual business practices;
  - if this request covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I; and
  - provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

The hour burden for the three events of this study are shown below: 1) requests by letter, phone, or during site visits for submission of documents that describe the costs of operating 1937 Act units, 2) requests for clarification of information in documents received, and 3) observations of actual conditions during site visits.

<b>Tribe/TDHE Burden Hours and Cost</b>							
	<b>Number of Tribes/TDHEs with 1937 Act Units</b>	<b>Frequency of Their Responses</b>	<b>Expected Number or Tribes/TDHEs Responding</b>	<b>Expected Average Response Time(Hours)</b>	<b>Total Annual Burden Hours</b>	<b>Estimated Hour Cost</b>	<b>Total Annual Cost</b>
<b>Cost Records Submission</b>	261	One submission	105	4	420	\$25.06	\$10,525.20
<b>Cost Record Clarification</b>	105	One contact	105	1	105	\$25.06	\$ 2,631.30
<b>Site Visits</b>	45	One visit	45	10	450	\$25.06	\$11,277.00
<b>TOTALS</b>				15	975		\$24,433.50

The estimated annualized cost to Tribes/TDHEs is based on the 2006 general pay schedule for a GS-11, Step 5, rate that is \$25.06 per hour.

The expected response time for records submission is expected to range from 0.5 to 6.0 hours, with an average of 4 hours.

Pilot testing indicates that 0-5 contacts will be needed for clarification of submitted records. The expected response time for clarification is expected to range from 0.0 to 1.5 hours, with an average of 1 hour.

Pilot testing indicates that the site visits will range from 2 to 17 hours, with an average of 10 hours.

During site visits the observation of existing conditions will include housing units and will therefore place a burden on those unit residents. This burden is expected to range from 0.75 to 2.0 hours per house with an average of 1.0 hour. Twenty-five Tribes/TDHEs will select up to 4 houses for observation.

<b>Resident Burden Hours and Cost</b>							
	<b>Number of Tribes/TDHEs with 1937 Act Units</b>	<b>Frequency of Their Responses</b>	<b>Expected Number or Residents Responding</b>	<b>Expected Average Response Time(Hours)</b>	<b>Total Annual Burden Hours</b>	<b>Estimated Hour Cost</b>	<b>Total Annual Cost</b>
<b>House Evaluation</b>	261	25 Tribes; 4 homes per Tribe	100	1	100	\$0	\$ 0

There will be no annual collection; this is a one time only collection of information that already exists in Tribe/TDHE records.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information (do not include the cost of any hour burden shown in Items 12 and 14).
- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s) and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities;
  - If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10) utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
  - generally, estimates should not include purchases of equipment or services, or portions thereof made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There are no annual costs anticipated for respondents or recordkeepers. Data will be collected only once from existing records.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The direct and indirect costs of collecting this information for the Office of Native American Programs are estimated at \$910,182 for 27 months.

15. Explain the reasons for any program changes or adjustments reported in Items 13 and 14 of the OMB Form 83-I.

This is a new collection. The collection of information is necessary because the existing operating cost data used in the IHBG block grant formula is not current. It is based upon AEL data from FY 1996. The validity of the AEL data has been questioned by some members of the Formula Negotiated Rulemaking Committee in FY 2004.

16. For collection of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

There is no plan for publication beyond an internal report to the Agency.

Data obtained through the instrument (types and amounts of operating costs) will be aggregated by program type and region. When possible, comparisons will be made with historical data. No complex analytical techniques will be used. The total cost data will be examined to determine its potential for creating an adjustment factor for the IHBG formula.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Not Applicable

18. Explain each exception to the certification statement identified in item 19.

Not Applicable

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**B. Collections of Information Employing Statistical Methods**

Not Applicable. The respondent universe is the set of 261 TDHEs that operated housing developed under the 1937 Housing Act during fiscal years 2002-2004. No sampling of this population will be sought; information from all tribes is desired.