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:
U.S. Department of Housing and Urban Development
Office of Public and Indian Housing

2. OMB Control Number:
a. 2577-0263 b. None

3. Type of information collection: (check one)
- a. ☐ New Collection
- b. **X** Revision of a currently approved collection
- c. Extension of a currently approved collection
- d. ☐ Reinstatement, **without change**, of previously approved collection for which approval has expired
- e. ☐ Reinstatement, **with change**, of previously approved collection for which approval has expired
- f. ☐ 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. ☒ Regular
- b. ☐ Emergency
- c. ☐ Delegated

5. Small entities: Will this information collection have a significant economic impact on a substantial number of small entities?
☐ Yes ☒ No

6. Requested expiration date:
a. ☒ Three years from approval date b. ☐ Other (specify)

7. Title:
Recovery Act Reporting for the Community Development Block Grant Program for Indian Tribes and Alaska Native Villages (ICDBG)

8. Agency form number(s): (if applicable)

9. Keywords:
Housing, Indians, Community Economic Development Block Grants, American Recovery and Reinvestment Act

10. Abstract:
The American Recovery and Reinvestment Act of 2009 (Recovery Act) provided a one-time Indian Community Development Block Grant funding to eligible Indian tribes (or tribal organizations on behalf of Indian tribes) for the development of decent housing, environment, and economic opportunities for low and moderate-income persons in Indian service areas. Fifty-Three applicants applied for funding. Nineteen applicants were awarded funding.

11. Affected public: (mark primary with "P" and all others that apply with "X")
- a. Individuals or households
- b. Business or other for-profit
- c. Not-for-profit institutions
- e. Farms
- f. Federal Government
- g. **P** State, Local or Tribal Government

12. Obligation to respond: (mark primary with "P" and all others that apply with "X")
- a. Voluntary
- b. **P** Required to obtain or retain benefits
- c. Mandatory

13. Annual reporting and recordkeeping hour burden:

a. Number of respondents	19
b. Total annual responses	19
Percentage of these responses collected electronically	0
c. Total annual hours requested	38
d. Current OMB inventory	6,295
e. Difference (+,-)	-6,257
f. Explanation of difference:	
1. Program change:	0
2. Adjustment:	-6,257

14. Annual reporting and recordkeeping cost burden: (in thousands of dollars)
Do not include costs based on the hours in item 13.

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:	
2. Adjustment:	

15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X")
- a. **P** Application for benefits
- b. Program evaluation
- c. General purpose statistics
- d. Audit
- e. Program planning or management
- f. Research
- g. **X** Regulatory or compliance

16. Frequency of recordkeeping or reporting: (check all that apply)
- a. ☒ Recordkeeping
- b. ☐ Third party disclosure
- c. ☒ Reporting:
  - 1. ☐ On occasion
  - 2. ☐ Weekly
  - 3. ☐ Monthly
  - 4 X Quarterly
  - 5. ☐ Semi-annually
  - 6. **x** Annually
  - 7. ☐ Biannually
  - 8. ☒ Other (describe) Final Report

17. Statistical methods:
Does this information collection employ statistical methods?
☐ Yes ☒ No

18. Agency contact: (person who can best answer questions regarding the content of this submission)
Name: Deborah Lalancette
Phone: (303) 675-1625

19. Certification for Paperwork Reduction Act Submissions

On behalf of the U.S. Department of Housing and Urban Development, 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 Deitzer, Departmental Reports Management Officer, Office of the Chief Information Officer	Date:

Supporting Statement for Information Collection: Application for Indian Community Development Block Grant (ICDBG) Programs Grant Assistance

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.

On February 17, 2009, the "American Recovery and Reinvestment Act of 2009" (Recovery Act) was enacted to provide economic stimulus for the U.S. economy. Pursuant to the Recovery Act, Community Development Funds were appropriated (to remain available till September 30, 2010) to carry out the community development block grant program under title I of the Housing and Community Development Act of 1974 (42 U.S.C. 5301 et seq.) The Indian Community Development Block Grant (ICDBG) program, pursuant to 42 U.S.C. 5306 (copy attached), is authorized a 1 percent set-aside of the Community Development Fund for Indian tribes and requires the Department of Housing and Urban Development (HUD) to make approximately $10 million available through a one time grant competition to Indian tribes (or tribal organizations on behalf of Indian tribes) who received an ICDBG grant in fiscal year 2008. The Office of Native American Programs (ONAP) in HUD's Office of Public and Indian Housing (PIH) administers the ICDBG program.

The Recovery Act ICDBG Grant Program for Indian tribes and Alaska Native villages is a one time grant program offered in 2009 in addition to the regular ICDBG funding competition. This program required eligible applicants to submit information to enable HUD to select the best projects for funding during the one time competition. The collection of this information is essential for HUD to monitor grants and ensure that grantees are making proper use of federal funding. ICDBG funds are used for the development of viable Indian and Alaska Native communities, including the creation of decent housing, suitable living environments and economic opportunities primarily for persons with low- and moderate-incomes as defined in 24 CFR § 1003.4. The Recovery Act required that, in selecting ICDBG projects to be funded, priority shall be given to projects that can award contacts based on bids within 120 days from the date the funds are made available to the recipients. The Recovery Act requires the submission of standard program reports, in addition to a quarterly report developed by the Office of Management and Budget for all Recovery Act grantees. The ICDBG program regulations can be found in 24 CFR Part 1003.

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.

HUD ONAP used the information to ensure that statutory and regulatory requirements were met prior to entering into grant agreements, including information regarding distribution and obligation of funds when spending this one time allocation. Respondents were eligible Indian tribes or tribal organizations on behalf of Indian tribes that received ICDBG grants in fiscal year 2008. The information was collected during the application process. Collection of this data served two purposes:

a) It enabled HUD to select grantees under a competitive selection process with the assurance that the grantee had the capacity to quickly and effectively implement economic stimulus projects in Indian country.

b) It will enable the Office of Native American Programs Grants Management Specialists and Grants Evaluation Specialists to monitor each grantee's performance according to their projected budget and implementation schedules.

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.

   Electronic submission of the SF-425 and the ASER may only be done by scanning the document then attaching it to electronic mail or facsimile transmission.

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 program does not duplicate any existing government program. No similar information is available.

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.

   The ICDBG Recovery Act program does not involve small businesses or other small entities.

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 the requested information was not collected during the application process, HUD would not have qualitative and quantitive criteria for selecting applicants with the capacity to implement the Recovery Act projects in a timely manner. If reporting information is not collected for monitoring purposes, HUD would not be able to ensure that federal dollars were being spent wisely and appropriately and in accordance with the ICDBG Recovery Act criteria

   Information collected pursuant to submitting applications was requested only once as this was a one time funding program. Information collected for monitoring purposes is submitted quarterly and annually during the three year grant performance period. A final report is also submitted when all funds are expended. To require less frequent submission would mean that no action could be taken to correct administrative problems before the end of the grant period nor would timely information on project progress be made available for Recovery Act reporting purposes.

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.

   Respondents are not required to report information to the agency more than quarterly;
   Respondents are not required to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
   Respondents are not required to submit more than an original and two copies of any document;
   Respondents are not required to retain records other than health, medical, government contract, grant-in-aid or tax records for more than three years;
   The information collection does not require the use of statistical survey that is not designed to produce valid and reliable results than can be generalized to the universe of study;
   The information collection does not require the use of a statistical data collection that has not been reviewed and approved by OMB;

The information collection does not include a pledge of confidentiality not supported by statutory or regulatory authority *et al*;
The information collection does not require respondents to submit proprietary trade secrets or other confidential information.

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.

A Notice of Proposed Information Collection in the Federal Register announcing the agency's intention to request an OMB review of data collection activities for the Recovery Act Application for the Community Development Block Grant Program for Indian Tribes and Alaska Native Villages (ICDBG) was not published in the Federal Register for this Information Collection Request. This publication was waived by OMB because of the urgency to obligated Recovery Act funds.

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

No payments or gifts will be made to respondents.

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

HUD ONAP does not have unique confidentiality policies or other privacy polices applicable to the collection of this information. There is no assurance of confidentiality. This information is available under the Freedom of Information Act.

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.

There are no questions of a sensitive nature included in the information collection.

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.

In Fiscal Year 2008, 83 awardees were funded through the Indian Community Development Block Grant (ICDBG) program and were eligible to apply for the ICDBG competitive grants created by the Recovery Act.

HUD received a total of 53 applications for the ICDBG Recovery Act competitive grants. Nineteen grants were awarded.

1) Post-Award

HUD estimates that each grantee will spend approximately 175 hours a year maintaining records. Each grantee will spend approximately 12.5 hours a year preparing quarterly and annual reports and 2 hours during each funding cycle's final grant year preparing an annual report and prepare one final report requiring 25 hours. Clerical staff will prepare these reports. HUD estimates the applicable hourly rate at $18. The computation is as follow: 19 grantees x 175 hours x $18 an hour = $59,850.

Description of Information Collection	Number of Respondents	Responses per Year	Total Annual Responses	Burden Hours	Total Hours
Federal Cash Transactions Reports (SF-425)	19*				
Annual Status and Evaluation Report (ASER)	19	1	19	2	38
Total	**19**		**19**		**38**

* Burden hours included in SF-425 Paperwork Reduction Act Submission.

ICDBG Recovery Act grantees will also be subject to Recovery Act reporting requirements.

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 is no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

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.

1) Post-Award

HUD awarded 19 grants pursuant to ICDBG Notice of Funding Availability. With annual reporting, HUD would receive 19 progress reports for each grant cycle, requiring a total review time of 120 hours per grant per report, for a total of 2,280 hours. Assuming a GS-12 (step 5) conducts the reviews, the cost is computed as follows: 120 hours x 19 reports x $32.36 an hour = $73,780.80.

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 revision of a previously approved collection. The original estimate of 83 applications was updated to reflect actual total of 53 applications received and 19 awards which resulted in a decrease of 2970 burden hours. This collection removes the application requirements and only covers reporting requirements.

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.

The 1989 Reform Act requires that all funding awards be published in the Federal Register.

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.

The OMB approval number and the expiration date will be shown on all the HUD forms.

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

There are no exceptions to the certification statement, item 19 of OMB Form 83i.

B. Collections of Information Employing Statistical Methods

The information collection will not use statistical methods.