



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, D.C. 20410-5000

ASSISTANT SECRETARY FOR
PUBLIC AND INDIAN HOUSING

December 10, 2010

Mr. Ross A. Rutledge
OMB Desk Officer
Office of Management and Budget
New Executive Office Building
Washington, DC 20503

Dear Mr. Rutledge:

The Department is seeking emergency review of the Paperwork Reduction Act (PRA) requirements contained in the revision to the Indian Housing Block Grant (IHBG) Program information collection. The revision affects the Indian Housing Plan (IHP) and Annual Performance Report (APR) which have been modified significantly as a result of consultation with tribal grantees and statutory changes to the Native American Housing Assistance and Self-Determination Act (NAHASDA). The revision to the IHP/APR will simplify the IHBG program and will also result in a significant reduction in burden for IHBG recipients. The Notice of Paperwork Submission (copy enclosed), explains the burden of the collection requirements. This is a revision of a previously approved collection.

In compliance with the requirements of 5 CFR 1320.13, this letter requests emergency processing within 30 days from the date of this letter. This request for emergency processing is essential in order to implement the statutory changes to NAHASDA for fiscal year 2012. A standard PRA review would delay implementation of the revised IHP/APR until fiscal year 2013.

The agency cannot reasonably comply with the normal clearance procedures under this part because the statutory changes accelerate the submission of the IHP. With implementation of the statutory changes, the IHP is due 75 days prior to the beginning of the grantee's fiscal year. For grantees with a fiscal year beginning October 1, 2011, the revised IHP will be due July 16, 2011, rather than July 1, 2012. The emergency clearance processing of the revised PRA is needed in order to provide IHBG recipients with sufficient time to complete the IHP prior to submission and provide training to all IHBG recipients on the revised form. Therefore, the use of the normal clearance procedures is reasonably likely to prevent or disrupt the collection of information and is reasonably likely to cause a statutory deadline to be missed.

The revision of the IHP and APR includes many statutory changes that are required as a result of the NAHASDA Reauthorization Act which was effective October 14, 2008. Since that time, the IHP and APR have been revised to accommodate the statutory changes in consultation with tribal recipients through a Negotiated Rulemaking process. This consultative process interrupted the previous request for approval of the revised forms. The issues that were raised during the consultation process were resolved with the Negotiated Rulemaking Committee and the form has been updated based on that process.

The APR enhancements include a statutory change as well as a better collection of data on outputs and outcomes from the IHBG Program. The improvement in data collection will allow HUD to provide Congress and the public with better information about the effectiveness of the IHBG Program.

Thank you for your consideration and assistance.

Sincerely,

Sandra B. Henriquez
Assistant Secretary

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