

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.

<p>1. Agency/Subagency Originating Request: U.S. Department of Housing and Urban Development Office of Public and Indian Housing</p>	<p>2. OMB Control Number: a. 2577-0191 b. <input type="checkbox"/> None</p>
<p>3. Type of information collection: (check one)</p> <p>a. <input type="checkbox"/> New Collection</p> <p>b. <input checked="" type="checkbox"/> Revision of a currently approved collection</p> <p>c. <input type="checkbox"/> Extension of a currently approved collection</p> <p>d. <input type="checkbox"/> Reinstatement, without change, of previously approved collection for which approval has expired</p> <p>e. <input type="checkbox"/> Reinstatement, with change, of previously approved collection for which approval has expired</p> <p>f. <input type="checkbox"/> Existing collection in use without an OMB control number</p> <p>For b-f, note item A2 of Supporting Statement instructions.</p>	<p>4. Type of review requested: (check one)</p> <p>a. <input checked="" type="checkbox"/> Regular</p> <p>b. <input type="checkbox"/> Emergency - Approval requested by</p> <p>c. <input type="checkbox"/> Delegated</p> <p>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</p> <p>6. Requested expiration date: a. <input checked="" type="checkbox"/> Three years from approval date b. <input type="checkbox"/> Other (specify)</p>

7. Title:
Information Collection for the Indian Community Development Block Grant (ICDBG) Program for Indian tribes and Alaska Native Villages

8. Agency form number(s): (if applicable)
 SF-424, HUD-2880, HUD-2993, HUD-4123, HUD-4125, and HUD-2516

9. Keywords:
 Housing, Indian Community Development, ICDBG, Tribes, Economic development, Alaska, Community Development Block Grants, Grant Programs - housing and community development, Grant Programs - Indians, Reporting and recordkeeping requirements

10. Abstract:
 Title I of the Housing and Community Development Act of 1974 allows for applications of funding for the development of decent housing, environment and economic opportunities for low and moderate-income persons. The Indian Community Development Block Grant (ICDBG) Program for Indian tribes and Alaska Native villages requires applicants to submit information to enable HUD to select the best projects for funding during annual competitions. Eligible applicants are invited to submit grant applications through a Notice of Funding Availability which is posted on www.grants.gov. Required information is submitted through Application for Federal Assistance (SF-424), Applicant/Recipient Disclosure/Update Report (HUD-2880), Acknowledgment of Application Receipt (HUD-2993), and Cost Summary (HUD-4123), Implementation Schedule (HUD-4124). ICDBG recipients are also required to submit periodic information through the Federal Financial Report (SF-425) and the Contract and Subcontract Activity Report (HUD-2516).

<p>11. Affected public: (mark primary with "P" and all others that apply with "X")</p> <p>a. Individuals or households e. Farms</p> <p>b. X Business or other for-profit f. Federal Government</p> <p>c. X Not-for-profit institutions g. P State, Local or Tribal Government</p>	<p>12. Obligation to respond: (mark primary with "P" and all others that apply with "X")</p> <p>a. Voluntary</p> <p>b. P Required to obtain or retain benefits</p> <p>c. Mandatory</p>
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<p>13. Annual reporting and recordkeeping hour burden:</p> <table style="width: 100%;"> <tr><td>a. Number of respondents</td><td style="text-align: right;">225</td></tr> <tr><td>b. Total annual responses</td><td style="text-align: right;">840</td></tr> <tr><td> Percentage of these responses collected electronically</td><td style="text-align: right;">99%</td></tr> <tr><td>c. Total annual hours requested</td><td style="text-align: right;">10,095</td></tr> <tr><td>d. Current OMB inventory</td><td style="text-align: right;">9,370</td></tr> <tr><td>e. Difference (+,-)</td><td style="text-align: right;">725</td></tr> <tr><td>f. Explanation of difference:</td><td></td></tr> <tr><td> 1. Program change:</td><td style="text-align: right;">+175</td></tr> <tr><td> 2. Adjustment:</td><td style="text-align: right;">+550</td></tr> </table>	a. Number of respondents	225	b. Total annual responses	840	Percentage of these responses collected electronically	99%	c. Total annual hours requested	10,095	d. Current OMB inventory	9,370	e. Difference (+,-)	725	f. Explanation of difference:		1. Program change:	+175	2. Adjustment:	+550	<p>14. Annual reporting and recordkeeping cost burden: (in thousands of dollars) Do not include costs based on the hours in item 13.</p> <table style="width: 100%;"> <tr><td>a. Total annualized capital/startup costs</td><td style="text-align: right;">0.00</td></tr> <tr><td>b. Total annual costs (O&M)</td><td style="text-align: right;">0.00</td></tr> <tr><td>c. Total annualized cost requested</td><td style="text-align: right;">0.00</td></tr> <tr><td>d. Current OMB inventory</td><td style="text-align: right;">0.00</td></tr> <tr><td>e. Difference</td><td style="text-align: right;">0.00</td></tr> <tr><td>f. Explanation of difference:</td><td></td></tr> <tr><td> 1. Program change:</td><td style="text-align: right;">0.00</td></tr> <tr><td> 2. Adjustment:</td><td style="text-align: right;">0.00</td></tr> </table>	a. Total annualized capital/startup costs	0.00	b. Total annual costs (O&M)	0.00	c. Total annualized cost requested	0.00	d. Current OMB inventory	0.00	e. Difference	0.00	f. Explanation of difference:		1. Program change:	0.00	2. Adjustment:	0.00
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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. Program planning or management
b. Program evaluation f. Research
c. General purpose statistics g. Regulatory or compliance
d. Audit

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. Quarterly 5. Semi-annually 6. Annually
7. Biannually 8. Other (describe)

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) 675-1600

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
Colette Pollard, Departmental Paperwork Reduction Act Officer,
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.

Title I of the Housing and Community Development Act of 1974, which authorizes Community Development Block Grants, requires that grants for Indian tribes be awarded on a competitive basis. The purpose of the ICDBG program is to develop viable Indian and Alaska Native communities by creating decent housing, suitable living environments and economic opportunities primarily for low and moderate income persons. Consistent with this objective, not less than 70 percent of the expenditures are to benefit low and moderate income persons. The law specifies four criteria or options that are considered to meet this objective. The four options or criteria are: area benefit; limited clientele; housing; job creation/retention. Eligible applicants include Federally-recognized tribes, which includes Alaska Native communities, and tribally authorized tribal organizations.

The ICDBG program regulations can be found at 24 CFR 1003. The ICDBG program for Indian tribes and Alaska Native villages requires eligible applicants to submit information to enable HUD to select the best projects for funding during annual competitions. Additionally, the requirements are essential for HUD in monitoring grants to ensure that grantees are making proper use of Federal dollars.

ICDBG applicants must submit a complete application package which includes an Application for Federal Assistance (SF-424), Applicant/Recipient Disclosure/Update Report (HUD-2880), Implementation Schedule (HUD-4125), and Cost Summary (HUD-4123). If the applicant has a waiver of the electronic submission requirement and is submitting a paper application, an Acknowledgement of Application Receipt (HUD-2993) must also be submitted. If the applicant is a tribal organization, a resolution from the tribe stating that the tribal organization is submitting an application on behalf of the tribe must also be included in the application package.

Section 105 of the 1974 Housing and Community Development Act (42 U.S.C. 5305) was amended by section 588 of the Quality Housing and Work Responsibility Act of 1998 creating a new subsection (h) entitled, "Prohibition on Use of Assistance for Employment Relocation Activities." This subsection prohibits the use of Community Development Block Grant funds to facilitate the relocation of for-profit businesses from one labor market to another if the relocation is likely to result in significant job loss. HUD's regulations for the ICDBG program were amended to add § 1003.209, Prohibition on use of assistance from employment relocation activities, and revise § 1003.505, Records to be maintained, to include the statement, "This includes establishing and maintaining records demonstrating that the recipient has made the determinations required as a condition of eligibility of certain activities, including as prescribed in § 1003.209."

The ICDBG regulations at § 1003.209 prohibits certain job relocation activities that results in disinvestment in low and moderate income tribal communities. ICDBG recipients are prohibited from using ICDBG funds to facilitate the relocation of for-profit businesses from one "identified service area" as defined in § 1003.4, to another if the relocation is likely to result in significant job loss. To show compliance with the statute and regulations, ICDBG recipients that provide ICDBG assistance to a business must require and obtain, as a condition of the assistance, a certification from the assisted business that it has no plans to relocate jobs. If the assistance results in business relocation, the agreement must provide that the business will reimburse the ICDBG recipient for any assistance provided to, or expended on behalf of the business.

ICDBG recipients are required to submit a quarterly Federal Financial Report (SF-425) that provides a snapshot of the grant funds drawn from the recipient's line of credit. The reports are used to monitor cash transfers to the recipients and obtain expenditure data from the recipients. (Title 24 CFR 1003.501(16))

The government-wide administrative requirements for grants and cooperative agreements to state, local, and federally recognized Indian tribal governments codified by HUD at 24 CFR part 85 require that grantees and sub-grantees “take all necessary affirmative steps to assure that minority firms, women’s business enterprises, and labor surplus area firms are used when possible” (§ 85.36(e)). Consistent with these regulations, § 1003.506(b) requires that ICDBG grantees report on these activities on an annual basis, with Contract and Subcontract Activity reports being due to HUD on October 10 of each year (HUD-2516).

Copies of the Community Development Act of 1974, as amended, the 2012 Notice of Funding Availability (NOFA) and the ICDBG regulations are attached to this submission.

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.

ICDBG applicants are required to submit information to demonstrate compliance with eligibility and other program requirements. HUD uses collected information to determine whether applications meet minimum screening eligibility requirements and application submission requirements. Applicants provide general information about the project and are preliminary to the review of applicant’s response to the criteria for rating the application. HUD needs the information for grantee selection.

If a recipient decides to commit ICDBG assistance to a business (whether directly or indirectly), the grantee must require and obtain, as a condition for assistance, a certification from the assisted business that neither it, nor any of its subsidiaries, has plans to relocate jobs at the time of the agreement committing ICDBG assistance to the business. Further, the agreement must provide that, in the event the ICDBG assistance results in a business relocation subject to the anti-job pirating requirements of the ICDBG statute and regulations, the business will reimburse the ICDBG recipient for any assistance (with interest) provided to, or expended on behalf of, the business.

The information collected allows HUD to audit the program accurately. HUD will also use the information to verify that statutory, regulatory and other program compliance is met. The quality of reported data is a very important issue in maintaining HUD’s databases used to monitor a recipient’s performance and to determine program compliance.

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.

HUD has implemented Public Law 106-107 to streamline grants, and as of fiscal year 2005, has required all grant applications to be submitted electronically through the Grants.gov system. All ICDBG applications are submitted through the Grants.gov website unless a waiver of this requirement has been granted to the recipient.

With regard to all of the information collection requirements described in this package for the ICDBG program, HUD encourages appropriate cost effective methods, but does not prescribe particular technological collection techniques. Tribes are given maximum feasible deference in designing information collection systems that allow them to administer and monitor ICDBG funds and program compliance with applicable statutes and regulations.

There are currently no information collection technologies uniformly available which would further reduce the reporting burden on all affected entities. The information collection requirements have been reduced to the minimum necessary to meet regulatory requirements as indicated by the attached rules.

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

There is no duplication of project information. There are no other sources of information that are being submitted to HUD that duplicate the information of the application package. The periodic reporting and closeout package information is not a duplication of project information and there are no other sources of information.

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 collection of information does not impact small businesses or other small entities. Some tribal governments may meet the definition of a “small entity”, however; this information collection will not have a significant impact on these entities. HUD has minimized the burden on all applicants and recipients by allowing them to determine the complexity of the program contained in the application and grant.

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.

The information is collected at the time of grant application and is required to identify the applicant, describe the project, and comply with requirements of law or regulation. If no records are collected on this aspect of the program, program performance/regulatory compliance will not be able to be determined. According to 42 U.S.C. 5313 (b) and 24 CFR 1003.505 of HUD’s implementing regulations, each ICDBG grant recipient must establish and maintain records that are adequate to allow the Secretary to determine whether or not the program is being carried out according to the applicable laws. The anti-job pirating provisions of 24 CFR 1003.505, Records to maintained, includes the statement, *“This includes establishing and maintaining records demonstrating that the recipient has made the determinations required as a condition of eligibility of certain activities, including as prescribed in §1003.209.”*

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 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.

There are no special circumstances that would cause an information collection to be conducted in a special manner (as listed in the instructions to the supporting statement). HUD program regulations address the maintenance of the appropriate files. Records are not required to be retained beyond the 3-period beginning when the final expenditure documentation is submitted.

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 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 was published in the Federal Register, volume 76, page 23328, dated April 26, 2011. No comments were received.

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

There are no provisions to provide any payments or gifts to respondents, other than reenumeration of contractors or grantees.

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

There is no assurance of confidentiality. This information is available under the Freedom of Information Act (FOIA). In addition, the information collected under this request does not include information on individuals.

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 to be collected.

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.

There are approximately 579 native entities throughout the country, which includes tribes, pueblos, Alaska Native Regional Corporations, and Alaska Native Villages. The native entities may designate a tribal organization to submit an application and administer an ICDBG award on its behalf.

Based upon the Department's prior competition experience for this program 225 entities will prepare and submit an ICDBG application. The average application preparation time is 30 hours per application. Of the 225 respondents to the NOFA approximately 83 grants will be awarded each year. Grant recipients are required to submit a quarterly Federal Financial Report (SF-425) and at grant closeout. The Federal Financial Report has a preparation time of 30 minutes. Recipients that propose economic development projects may trigger the anti-job pirating provisions that require a statement on employment relocation activities. Such a statement would require a 3 hour timeframe for the determination and statement preparation, however, very few ICDBG applicants request funds for projects that would trigger this requirement. Grant recipients are also required to report on minority business enterprise activity by October 10 each year. Preparation of this report takes approximately 1 hour.

Estimated Number of Respondents, Responses, and Burden Hours Per Annum

	Respondents	Frequency of Responses	Total Responses	Burden Hours	Total Hours
Grant Application (includes SF-424,	225	1	225	30	6,750

HUD-2880, HUD-2993, HUD-4123, and HUD 4125)					
Statement on employment relocation activities	5	1	5	3	15
Federal Financial Report (SF-425)	332	4	1,328	0.50	664
Minority Business Enterprise Report (HUD-2516)	332	1	332	1	332
Annual Status and Evaluation Report (ASER)	332	1	332	4	1,328
Total	1,226		2,222	38.5	9,089

Estimates of Annualized Cost to Respondents

	Number of Hours	Cost Per Hour*	Total Cost
Grant Application	6,750	\$18.00	\$121,500
Statement of Employment Relocation	15	\$18.00	\$270
Federal Financial Report	664	\$18.00	\$11,952
Minority Business Enterprise Report	332	\$18.00	\$5,976
Annual Status and Evaluation Report	1,328	\$18.00	\$23,904
Total	9,089	\$18.00	\$163,602

*The hourly cost is based on an average annual salary of \$37,440

13. Provide an estimate of the total annual cost burden to respondents or record keepers 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 additional costs other than what is reported above.

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 review of application information will not constitute an additional staff burden. This is a routine servicing and technical assistance function already being performed.

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

The number of burden hours for the application submission was reduced because the Federal Cash Transactions Report (SF-272) and the Financial Status Report (SF-269) was replaced by the Federal Financial Report (SF-425). Applicants are no longer required to submit the SF424 SUPP or the HUD-2994-A so that further reduces the burden hours. The inclusion of the Contract and Subcontract Activity (HUD-2516) on the other hand necessitated a modification of the burden hours. A review of ICDBG applications from 2006 through 2011 revealed that approximately 83 grants are awarded each year. Most ICDBG grants take three years to complete – others longer. This calculation assumes recipients of applicants in fiscal years 2008 through 2011 are continuing to submit the required annual reports (SF-425, HUD-2516, and the ASER).

16. For collections of information whose results are planned to 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 information collected is not for statistical use nor does its collection use statistical methods, however, the information is provided to Congress, upon request.

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 number and expiration date of the information collection will be displayed on the forms.

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

There are not exceptions to the certification identified in Item 19 of the OMB 83-I.