

# 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, Office of Native American Programs	2. OMB Control Number: a. 2577-0218 b. <input type="checkbox"/> None
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3. Type of information collection: (check one) a. <input type="checkbox"/> New Collection b. <input checked="" type="checkbox"/> Revision of a currently approved collection c. Extension of a currently approved collection d. 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 type="checkbox"/> Regular b. <input checked="" 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? Yes No X 6. Requested expiration date: a. <input checked="" type="checkbox"/> Three years form approval date    b. <input type="checkbox"/> Other (specify)
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7. Title:  
**Indian Housing Block Grant (IHBG) Information Collection**

8. Agency form number(s): (if applicable) Applicant/Recipient Disclosure/Update Report (HUD-2880), Acknowledgement of Application Receipt (HUD-2993), IHBG Cost Summary (HUD-53246), IHBG Implementation Schedule (HUD-53247), and Annual Performance Report (HUD-52737).  
 9. Keywords: Housing, Indian Housing Block Grant NOFA, low- and moderate-income Indian housing, Indian housing and community development, NAHASDA, Native American  
 10. Abstract: The Native American Housing Assistance and Self Determination Act (NAHASDA) authorizes the award of Indian Housing Block Grants (IHBG) competitively through a Notice of Funding Availability (NOFA) to spur the construction and rehabilitation of low-income housing in tribal communities. The NOFA requires applicants to submit a grant application that includes a narrative response to NOFA requirements, Application for Federal Assistance (SF-424), Applicant/Recipient Disclosure/Update Report (HUD-2880), Acknowledgement of Application Receipt (HUD-2993), and two new forms: IHBG Cost Summary (HUD-53246), and IHBG Implementation Schedule (HUD-53247). Successful applicants will also submit post-award reports including the Annual Performance Report (HUD-52737). The Annual Performance Report (HUD-52737) is not part of this information collection and displays a valid OMB Control Number through July 31, 2018.

11. Affected public: (mark primary with "P" and all others that apply with "X") a. <input checked="" type="checkbox"/> Individuals or households    e. <input type="checkbox"/> Farms b. <input type="checkbox"/> Business or other for-profit    f. <input type="checkbox"/> Federal Government c. <input type="checkbox"/> Not-for-profit institutions    g. <input checked="" type="checkbox"/> State, Local or Tribal Government	12. Obligation to respond: (mark primary with "P" and all others that apply with "X") a. <input type="checkbox"/> Voluntary b. <input checked="" type="checkbox"/> Required to obtain or retain benefits c. <input checked="" type="checkbox"/> Mandatory
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13. Annual reporting and recordkeeping hour burden: <table style="width: 100%; border-collapse: collapse;"> <tr><td style="width: 80%;">a. Number of respondents</td><td style="text-align: right;">700</td></tr> <tr><td>b. Total annual responses</td><td style="text-align: right;">700</td></tr> <tr><td>Percentage of these responses collected electronically</td><td style="text-align: right;">100</td></tr> <tr><td>c. Total annual hours requested</td><td style="text-align: right;">94,367</td></tr> <tr><td>d. Current OMB inventory</td><td style="text-align: right;">47,967</td></tr> <tr><td>e. Difference (+,-)</td><td style="text-align: right;">+46,400</td></tr> </table> f. Explanation of difference: <table style="width: 100%; border-collapse: collapse;"> <tr><td style="width: 80%;">1. Program change:</td><td style="text-align: right;">+46,400</td></tr> <tr><td>2. Adjustment:</td><td style="text-align: right;">0</td></tr> </table>	a. Number of respondents	700	b. Total annual responses	700	Percentage of these responses collected electronically	100	c. Total annual hours requested	94,367	d. Current OMB inventory	47,967	e. Difference (+,-)	+46,400	1. Program change:	+46,400	2. Adjustment:	0	14. Annual reporting and recordkeeping cost burden: (in thousands of dollars) <table style="width: 100%; border-collapse: collapse;"> <tr><td style="width: 80%;">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. Total annual cost requested</td><td style="text-align: right;">\$1,068,028</td></tr> <tr><td>e. Current OMB inventory</td><td style="text-align: right;">\$863,406</td></tr> </table> f. Explanation of difference: <table style="width: 100%; border-collapse: collapse;"> <tr><td style="width: 80%;">1. Program change:</td><td style="text-align: right;">+\$204,622</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. Total annual cost requested	\$1,068,028	e. Current OMB inventory	\$863,406	1. Program change:	+\$204,622	2. Adjustment:	0
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15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X") a. <input checked="" type="checkbox"/> Application for benefits    e. <input checked="" type="checkbox"/> Program planning or management b. <input checked="" type="checkbox"/> Program evaluation    f. <input type="checkbox"/> Research c. <input type="checkbox"/> General purpose statistics    g. <input checked="" type="checkbox"/> Regulatory or compliance d. <input type="checkbox"/> Audit	16. Frequency of recordkeeping or reporting: (check all that apply) a. <input type="checkbox"/> Recordkeeping    b. <input type="checkbox"/> Third party disclosure b. <input checked="" type="checkbox"/> Reporting: <table style="width: 100%; border-collapse: collapse;"> <tr><td style="width: 33%;">1. <input checked="" type="checkbox"/> On occasion</td><td style="width: 33%;">2. <input type="checkbox"/> Weekly</td><td style="width: 33%;">3. <input type="checkbox"/> Monthly</td></tr> <tr><td>4. <input checked="" type="checkbox"/> Quarterly</td><td>5. <input type="checkbox"/> Semi-annually</td><td>6. <input checked="" type="checkbox"/> Annually</td></tr> <tr><td>7. <input type="checkbox"/> Biannually</td><td>8. <input type="checkbox"/> Other (describe)</td><td></td></tr> </table>	1. <input checked="" type="checkbox"/> On occasion	2. <input type="checkbox"/> Weekly	3. <input type="checkbox"/> Monthly	4. <input checked="" type="checkbox"/> Quarterly	5. <input type="checkbox"/> Semi-annually	6. <input checked="" type="checkbox"/> Annually	7. <input type="checkbox"/> Biannually	8. <input type="checkbox"/> Other (describe)	
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17. Statistical methods: Does this information collection employ statistical methods? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	18. Agency contact: (person who can best answer questions regarding the content of this submission) Name: Fred Griefer Phone: (202) 402-5186
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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 Heidi Frechette, Deputy Assistant Secretary Office of Native American Program (ONAP)	Date:
Signature of Senior Officer or Designee:  X Colette Pollard, Departmental Reports Management Officer Office of 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.**

The Native American Housing Assistance and Self-Determination Reauthorization Act of 1996 (25 U.S.C. 4101 et seq.) (NAHASDA) authorizes funding for the Indian Housing Block Grant (IHBG) program that supports the development, management, and operation of affordable homeownership and rental housing; infrastructure development; and other forms of housing assistance intended for low-income persons. Federally-recognized Native American and Alaska Native tribes, tribally-designated housing entities, and the Department of Hawaiian Home Lands are eligible to receive IHBG funds. NAHASDA is a formula-driven program whereby eligible recipients receive an equitable share of funds as appropriated by Congress.

In Fiscal Year 2018, Congress enacted H.R. 1625- Consolidated Appropriations Act, 2018 (P.L. 115-141) (Effective: 3/23/18) that appropriated \$99,000,000 for competitive grants under NAHASDA. The Indian Housing Block Grant Competitive (IHBG Competitive) program will give priority to projects that will spur construction and rehabilitation from NAHASDA-eligible recipients while considering need and administrative capacity. Additionally, applicants may apply for other eligible activities under Section 202 of NAHASDA.

HUD will make IHBG Competitive funds available under a Notice of Funding Availability (NOFA) and will award the funds to the applicants with the highest rated applications, particularly those with the greatest housing need and administrative capacity. The regulations and requirements governing the formula-driven IHBG program will apply to the competitive IHBG program

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IHBG applicants must submit a complete application package which includes a narrative response to the NOFA requirements, Application for Federal Assistance (SF-424), Applicant/Recipient Disclosure/Update Report (HUD-2880), Acknowledgement of Application Receipt (HUD-2993), and two new forms: IHBG Cost Summary (HUD-53246), and IHBG Implementation Schedule (HUD-53247). At the end of the 12-month program year, grant recipients submit Annual Performance Reports (HUD-52737) describing accomplishments, outcomes, and outputs. **NOTE:** The Annual Performance Report (HUD-52737) is not part of this information collection and has a valid OMB Control Number through July 31, 2019.

Attached to this submission are copies of the FY 2018 Appropriations language for the competitive IHBG program, FY 2018 Competitive IHBG NOFA, NAHASDA, and NAHASDA regulations at 24 CFR Part 1000.

- 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 uses the information collected to evaluate applications, make grant awards, monitor grantee performance throughout the grant term, and report annually to Congress.

- 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.**

All required documentation will be submitted electronically through Grants.gov.

**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.**

There are no other sources of information that are being submitted to HUD that duplicate the information in the grant applications.

**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.**

HUD has minimized the burden on all recipients by allowing the applicant to determine the complexity of the program being offered within their area of responsibility. HUD staff is available to provide one-on-one assistance if needed.

**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 IHBG Competitive program is authorized by Congress and the information collected is required for annual reports to Congress.

**7. Explain any special circumstances that would cause an information to be collected in a manner:**

- requiring respondents to report information to the agency more than quarterly;  
Recipients are required to submit SF-425s quarterly and within 90 days of project completion.
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;  
**Not Applicable**
- requiring respondents to submit more than an original and two copies of any document;  
**Not Applicable**
- requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years;  
**Not Applicable**
- in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of the study;  
**Not Applicable**
- requiring the use of statistical data classification that has not been reviewed and approved by OMB;  
**Not Applicable**
- 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  
**Not Applicable**
- 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.  
**Not Applicable**

There are no special circumstances that would cause the information collection to be conducted in a special manner (as listed in the instructions to the supporting statement). HUD program regulations address the maintenance and retention of the appropriate files. The grantee must retain its ICDBG records for three years upon submission of the final expenditure documentation.

**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.

HUD published a Notice of Proposed Information Collection for Public Comments in the *Federal Register*, Volume XX; No. X; Page XXX on XXXXX X, XXXX. The public was given until XXXXX X, XXXX to submit comments on the proposed information collection. HUD received no comments on this proposed collection.

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

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

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

The information collection is public information; therefore, there is no assurance of confidentiality.

**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.**

HUD estimates that it will receive 500 grant applications and will fund 200 IHBG Competitive awards. Each awardee will complete and submit a grant application and, allowing for variations in the applicant's program, preparation of the application takes an average of 80 hours. At the end 12-month program year, the recipient will submit an Annual Performance Report (HUD-52737) and it takes an average of 32 hours to complete and submit the report.

The table on the following page provides estimates on the number of respondents, frequency of submissions, total responses, and the estimated annual burden. The estimated levels of effort are based on recent discussions with ONAP staff and their interactions with tribes and tribally designated housing entities.

See the following page.

**Estimated Number of Respondents, Responses, and Annual Burden Hours**

<i>Type of Submission</i>	<i>Number of Respondents</i>	<i>Frequency of Submissions</i>	<i>Total Responses</i>	<i>Estimate Average Time (Hrs)</i>	<i>Estimate Annual Burden (Hrs)</i>
<b><i>IHBG Competitive Program</i></b>					
IHBG Competitive Grant Application (Includes Narrative, SF-424, HUD-2880, HUD-2993, HUD-53246, HUD-53247)	500	1	500	80	40,000
Annual Performance Report (HUD-52737)	200	1	200	32	6,400
Sub Total	700		700		46,400
<b><i>IHBG Program</i></b>					
IHP/APR (HUD-52737)	366	2	732	62	45,384
Formula Correction (HUD-4117)	300	1	300	0.5	150
Formula Challenge (HUD-4119)	15	1	15	150	2,250
Depository Agreement (Banker) (HUD-52736-A)	366	1	366	0.25	91.5
Depository Agreement (Broker) (HUD-52736-B)	366	1	366	0.25	91.5
Sub Total	366		1,779		47,967
Grand Total	1,066		2,479		94,367

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.

#### Estimated Annualized Cost to Respondents

<i>Type of Submission</i>	<i>Number of Hours</i>	<i>Cost per Hour*</i>	<i>Total Cost</i>
<b><i>IHBG Competitive Program</i></b>			
IHBG Competitive Grant Application (Includes Narrative, SF-424, HUD-2880, HUD-2993, HUD-53246, HUD-53247)	40,000	\$ 18	\$720,000
Annual Performance Report (HUD-52737)	6,400	\$ 18	\$115,200
Sub Total	46,400		\$835,200
<b><i>IHBG Program</i></b>			
IHP/APR (HUD-52737)	45,384	\$18	\$816,912
Formula Correction (HUD-4117)	150	\$18	\$2,700
Formula Challenge (HUD-4119)	2,250	\$18	\$40,500
Depository Agreement (Banker) (HUD-52736-A)	91.5	\$18	\$1,647
Depository Agreement (Broker) (HUD-52736-B)	91.5	\$18	\$1,647
Sub Total	47,967	\$18	\$863,406
Grand Total	94,367		\$1,698,606

\*The hourly cost is based on a mid-level staff position in a mid-sized tribal government and represents an average annual salary of \$34,560.

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 table below summarizes the estimated annualized cost for reviewing the grant applications and forms associated with the IHBG Competitive program.

**Estimated Annualized Costs to the Federal Government**

<i>Type of Submission</i>	<i>Number of Respondents</i>
<b><i>IHBG Competitive Program</i></b>	
IHBG Competitive Grant Application (Includes Narrative, SF-424, HUD-2880, HUD-2993, HUD-53246, HUD-53247)	
Annual Performance Report (HUD-52737)	
Sub Total	
<b><i>IHBG Program</i></b>	
IHP/APR (HUD-52737)	
Formula Correction (HUD-4117)	
Formula Challenge (HUD-4119)	
Sub Total	
Grand Total	

**NOTES:** The hourly rate of \$39 represents the 2018/2019 costs of contracted services to review the IHBG Competitive grant applications. The hourly rate of \$38 represents midpoint in the 2018 GS-12 schedule for an Area ONAP. The hourly rate of \$57 represents the midpoint in the 2018 GS-13 schedule for HQ staff.

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 currently approved collection.

On or about July 7, 2018, OMB's Office of Information and Regulatory Affairs approved the submission of this request for emergency PRA processing and review. At the time, the program was referred to as the Native American Housing Block Grant program. Subsequent to OMB's approval, the Deputy Assistant Secretary for HUD's Office of Native American Programs decided to change the program's name to the IHBG Competitive program to more accurately reflect the competitive nature of the new program. The rationale for the emergency request, as described below, has not changed, only the program name has changed.

HUD believes that the funding for IHBG Competitive meets the emergency processing criteria of 5 CFR § 1320.13. The appropriations language meets the "unanticipated event" criteria of 5 CFR §1320.13 because this additional funding creates an entirely new competitive grant program to supplement the traditional formula-based block grant program of NAHASDA. Furthermore, the Department believes that the information collection associated with this competitive grant warrants emergency processing because following the regular PRA schedule would impede both the intent of this additional appropriation and HUD's goal to award funding to Native American communities in an expedited manner. The "Consolidated Appropriations Act of 2018" also directs the Department to give priority to projects that will "spur construction and rehabilitation for grantees" and the additional amount would "remain available until September 30, 2022." For example, construction projects in Indian Country can take three to five years from start to completion due to remote locations and complex land issues. Following an expedited emergency processing time frame would maximize the limited period of availability given by Congress for recipients to plan and implement projects as soon as possible.

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.

Section 407 of NAHASDA requires the Secretary to prepare an annual report to Congress; the information gathered in this collection will be used to prepare that report. The Secretary is required to include a description of the progress made in accomplishing the objectives of the IHBG Competitive program and to summarize the use of funds during the preceding 12-month period.

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 no exceptions to the certification identified in Item 19 of the OMB 83-i.

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

The information will not be published for statistical purposes