

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 |
|---|--|

| | |
|--|---|
| 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. <input type="checkbox"/> Extension of a currently approved collection d. <input type="checkbox"/> Reinstatement, without change , of previously approved collection for which approval has expired e. <input type="checkbox"/> Reinstatement, with change , 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? Yes No X 6. Requested expiration date: a. <input checked="" type="checkbox"/> Three years form approval date b. <input type="checkbox"/> Other (specify) |
|--|---|

7. Title:
Indian Housing Block Grant (IHBG) Information Collection

8. Agency form number(s): (if applicable), HUD-4117, HUD-4119, HUD-52736-A, HUD-52736-B, HUD-52737, HUD-53246, HUD-53247

9. Keywords: Housing, low-and moderate-income housing, housing and community development, NAHASDA, IHBG, IHBG Competitive, IHBG Native American housing, Indians
10. Abstract: This information collection includes forms associated with the Indian Housing Block Grant program (formula and competitive) as authorized under the Native American Housing Assistance and Self-Determination Act of 1996 (25 USC 4212).

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

| | |
|---|---|
| 13. Annual reporting and recordkeeping hour burden: a. Number of respondents 792 b. Total annual responses 2,395 Percentage of these responses collected electronically 90 c. Total annual hours requested 140,805 d. Current OMB inventory 94,367 e. Difference (+,-) +46,438 f. Explanation of difference: 1. Program change: 0 2. Adjustment: +46,438 | 14. Annual reporting and recordkeeping cost burden: (in thousands of dollars) 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 \$5,068,980 e. Current OMB inventory \$729,585 f. Explanation of difference: 1. Program change: 2. Adjustment: +\$4,339,395 |
|---|---|

| | |
|--|--|
| 15. Purpose of Information collection: (mark primary with "P" and all others that apply with "X") a. P Application for benefits e. X Program planning or management b. X Program evaluation f. Research c. General purpose statistics g. X Regulatory or compliance d. Audit | 16. Frequency of recordkeeping or reporting: (check all that apply) a. <input type="checkbox"/> Recordkeeping b. Third party disclosure b. <input checked="" type="checkbox"/> Reporting: 1. <input 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) |
|--|--|

| | |
|---|--|
| 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: Gary Nemeč Phone: (202) 402-2988 |
|---|--|

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 forms included in this collection are associated with the Indian Housing Block Grant (IHBG) program, as authorized under Title I of the Native American Housing Assistance and Self-Determination Reauthorization Act (NAHASDA) (25 U.S.C. 4101). The IHBG program provides funding to eligible Native American tribes and tribally designated housing entities (TDHEs) in the form of formula-based allocations and competitive awards.

IHBG Formula Allocations

NAHASDA authorizes HUD to allocate IHBG funds by formula annually. Recipients may use their IHBG funds to carry out a range of affordable housing activities that benefit low-income Indian families living on Indian reservations or in other Indian areas. HUD's Fiscal Year 2018 Report to Congress states that there are approximately 592 Indian tribes in 34 states that are eligible to participate in the program.

To receive an IHBG, a recipient is required to submit an Indian Housing Plan (IHP) annually to the Office of Native American Programs (ONAP). The IHP describes its planned affordable housing activities for its upcoming program year. The IHP is due to ONAP at least 75 days before the recipient's program year begins.

Recipients must also submit an Annual Performance Report (APR) to ONAP within 90 days of the end of their program year. The APR details the actual activities and accomplishments of their IHBG-funded housing programs.

IHBG Competitive Awards

In Fiscal Years 2018 and 2019, Congress enacted H.R. 1625- Consolidated Appropriations Act, 2018 (P.L. 115-141) (Effective: 3/23/18) that appropriated \$99,000,000 each fiscal year for IHBGs awarded on a competitive basis. The 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.

In Fiscal Year 2019, 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

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 APRs describing accomplishments, outcomes, and outputs.

Attached to this submission are copies of the FY 2018 Appropriations language for the competitive IHBG program, FY 2019 Competitive IHBG NOFA, NAHASDA statute, and NAHASDA regulations at 24 CFR Part 1000.

HUD-52737: Indian Housing Plan /Annual Performance Report (IHP/APR). A recipient of IHBG funds is required to submit an IHP/APR (HUD-52737) that consists of two components. The Indian Housing Plan (IHP)

component describes the eligible IHBG-funded, affordable housing activities the recipient plans to conduct for the benefit of low and moderate income tribal members and identifies the intended outcomes and outputs for the upcoming 12-month program year. At the end of the 12-month period, the recipient submits the Annual Performance Report (APR) component to describe (1) the use of grant funds during the prior 12-month period; (2) the actual outcomes and outputs achieved; (3) program accomplishments; and (4) jobs supported by IHBG-funded activities. (NAHASDA §§ 102 and 404).

HUD-4117 and HUD-4119: Formula Response Form and Guidelines for Challenging U.S. Decennial Census Data Document. IHBG recipients are responsible for notifying HUD of changes to the Formula Current Assisted Stock (FCAS) component of the IHBG formula. HUD is notified of changes in the FCAS through the Formula Response Form (HUD-4117). IHBG recipients or HUD may challenge the data from the U.S. Decennial Census or provide an alternative source of data by submitting the Guidelines for Challenging U.S. Decennial Census Data Document. Census challenges (HUD-4119) are due to HUD by March 30th of each fiscal year, as stipulated at 24 CFR § 1000.336.

HUD-52736-A and B: Depository Agreements. IHBG recipients have the option of investing IHBG funds in eligible instruments with bankers and brokers by using the Depository Agreement for bankers (HUD-52736-A) and the Depository Agreement for brokers (HUD-52736-B). These agreements may be executed at any time.

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.

Recipients of IHBG formula and IHBG Competitive funds are required to submit periodic information to HUD. HUD uses the information collected to make grant awards, monitor a recipient's performance, determine program compliance, 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.

For the IHBG program, approximately 90% of the information is collected electronically. All IHP/APRs are submitted electronically using the EPIC website or a fillable PDF that is submitted as an electronic mail attachment. The Formula Response form, Census Challenge forms, and Depository Agreements are most frequently submitted by facsimile or as an electronic mail attachment.

For the IHBG Competitive program, all required application documentation will be submitted electronically through Grants.gov. The APRs and SF-425s will be submitted electronically through HUD's web-based Energy and Performance Information Center.

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 IHP/APR. IHBG recipients do not have to challenge formula data and, if a recipient opts not to challenge the formula data, HUD will rely on the currently available data for determining a recipient's allocation.

For the IHBG Competitive program, 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.

Most recipients of funds authorized by NAHASDA represent entities that are small in scale and population numbers. HUD has minimized the burden on all recipients by allowing the recipient to determine the complexity and scale of its housing plans and programs. Additionally, ONAP 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 formula and Competitive programs are 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 of IHBG formula and Competitive funds 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

- 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 84; No. 53; Page 10117 on March 19, 2019. The public was given until May 20, 2019 to submit comments on the proposed information collection. HUD received and responded to public comments from National Low-Income Housing Coalition (NLIHC), and Santa Clara Pueblo Housing Authority.

- 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 for these programs 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.

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

Estimated Hourly Rates:

\$36/hour represents a mid-level staff position in a mid-sized tribal government at an average annual salary of approximately \$75,000.

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

| Indian Housing Block Grant Program | <i>Form Name</i> | <i>Number of Responses</i> | <i>Frequency of Response</i> | <i>Responses Annually</i> | <i>Burden Hour for Response</i> | <i>Respondent Annual Burden Hours</i> | <i>Respondent Hourly Base Rate</i> | <i>Respondent Annual Cost</i> |
|--|------------------------------------|----------------------------|------------------------------|---------------------------|---------------------------------|---------------------------------------|------------------------------------|-------------------------------|
| HUD-52737 | IHP/APR | 792 | 2 | 1,584 | 62 | 98,208 | \$ 36 | \$ 3,535,488 |
| HUD-4117 | Formula Correction | 300 | 1 | 300 | 0.5 | 150 | \$ 36 | \$ 5,400 |
| HUD-4119 | Formula Challenge | 15 | 1 | 15 | 150 | 2,250 | \$ 36 | \$ 81,000 |
| HUD-52736-A | Depository Agreement (Banker) | 394 | 1 | 394 | 0.25 | 99 | \$ 36 | \$ 3,546 |
| HUD-52736-B | Depository Agreement (Broker) | 394 | 1 | 394 | 0.25 | 99 | \$ 36 | \$ 3,546 |
| SF-424, HUD-2880, HUD-2993, HUD-53246, HUD-53247 | IHBG Competitive Grant Application | 500 | 1 | 500 | 80 | 40,000 | \$ 36 | \$ 1,440,000 |
| Total | | 2,395 | 7 | 3,187 | 293 | 140,805 | 216 | 5,068,980 |

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.

See table 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.**

Estimated Hourly Rates:

\$25/hour represents the mean in the FY 2019 GS-11, Step 1 schedule for an Area ONAP.

\$46/hour represents the mean in the FY 2019 GS-13 Step 1 schedule for HQ ONAP.

Annualized Cost to the Federal Government

| Indian Housing Block Grant Program | <i>Form Name</i> | <i>Number of Responses</i> | <i>Frequency of Response</i> | <i>Federal Reviews Annually</i> | <i>Federal Annual Burden Hours for Response</i> | <i>Federal Annual Burden Hours</i> | <i>Federal Hourly Base Rate</i> | <i>Federal Annual Cost</i> |
|--|------------------------------------|----------------------------|------------------------------|---------------------------------|---|------------------------------------|---------------------------------|----------------------------|
| HUD-52737 | IHP/APR | 792 | 2 | 1,584 | 20 | 31,680 | \$ 25 | \$ 792,000 |
| HUD-4117 | Formula Correction | 300 | 1 | 300 | 15 | 4,500 | \$ 46 | \$ 207,000 |
| HUD-4119 | Formula Challenge | 15 | 1 | 15 | 15 | 225 | \$ 46 | \$ 10,350 |
| HUD-52736-A | Depository Agreement (Banker) | 394 | 1 | 394 | 2 | 788 | \$ 25 | \$ 19,700 |
| HUD-52736-B | Depository Agreement (Broker) | 394 | 1 | 394 | 2 | 788 | \$ 25 | \$ 19,700 |
| SF-424, HUD-2880, HUD-2993, HUD-53246, HUD-53247 | IHBG Competitive Grant Application | 500 | 1 | 500 | 5 | 2,500 | \$ 25 | \$ 62,500 |
| Total | | 2,395 | 7 | 3,187 | 59 | 40,481 | \$ 192 | \$ 1,111,250 |

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

The number of respondents increased due to two factors: increased number of IHBG recipients and the inclusion of the IHBG Competitive program

The total number of respondents in the previously approved collection (366) was based on the actual number of tribes/TDHEs participating in the program at that time. This information collection bases the number of respondents on the total number of tribes/TDHEs that are eligible to participate in the program (592). While this is a significant adjustment, the updated number is more accurate in that it represents the total number of potential program recipients, whether they choose to participate or not.

The inclusion of the IHBG Competitive program in this information collection increased the number of respondents. ONAP assumes it will receive 500 grant applications and make 200 awards. Therefore, the number of respondents submitting an IHP/APR increased from 592 to 792.

ONAP seeks to include this new program in the IHBG information collection because both programs are authorized by the same statute, are governed by the same regulations, and share the same OMB control number.

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 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 NAHASDA 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.