1**Supporting Statement A**

Bureau of Indian Affairs Housing Improvement Program

OMB Control Number 1076-0184

Terms of Clearance: None.

General Instructions

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question "Does this ICR contain surveys, censuses, or employ statistical methods?" is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

Justification

1. **Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The regulation governing the Housing Improvement Program (HIP) administered by the Bureau of Indian Affairs is at 25 CFR 256. *See also* 25 U.S.C. 13. This regulation allows the leveraging of housing funds to increase the number of families served and projects funded, and provide tribes with flexibility to better address lengthy waiting lists of tribal members awaiting housing assistance. The BIA collects information in implementing this regulation to determine applicant eligibility for housing services based upon the criteria referenced in 25 CFR 256.9 (repairs and renovation assistance), 25 CFR 256.10 (replacement assistance), 25 CFR 256.11 (down payment assistance). The applicant must be a member of a federally recognized tribe, live in an approved tribal service area, meet annual income requirements, and meet other requirements in addition to the eligibility requirements in §§ 256.9 and 256.10. *See* 25 CFR 256.6.

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. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.**

Enrolled members of federally recognized tribes, who live within a tribe's designated and approved service area, submit information which determines who will be the beneficiaries of this program, the neediest of needy. The HIP application form that was developed for this program has been in existence since 1975 and is the instrument used to screen, identify, document and select individual American Indian families for this program. The application form requests the following information:

- Section A: The first 7 questions on the application establish the identity of the respondent, tribal affiliation and marital status. Questions 8 through 11 establish the identity of the spouse for identification purposes. The previous application asked the applicant for their social security number. This question has now been deleted.
- Section B: Establishes the size of the respondent's family or family composition or for determining the minimum number of bedrooms needed for this family.
- Section C: Questions 12 through 14 establish the financial resources available to the respondent and family and for determining whether or not this family meets the program income guidelines.
- Section D: Questions 15 through 24 provides a general description of the home or for determining the category of service.
- Section E: Questions 25 through 27 provides a legal description and location of house or for establishing ownership of the house. This revision adds a question to question 25 regarding whether the applicant can provide proof that the applicant can obtain the land, in accordance with regulatory revisions that allow eligibility under Categories C and A if the applicant can obtain a leasehold.
- Section F: Questions 28 through 34 provide pertinent information about respondent or for determining whether or not the applicant meets the regulatory requirements of the program. This revision adds a new question 32 regarding whether the applicant is seeking down payment assistance and, if so, whether the applicant has applied with another lending institution. This revision is in accordance with the new Category D for down payment assistance.
- Section G: This section is the certification by the respondent that the statements and information included with the applicant are true.

The HIP Addendum to the BIA Form 6407, is a sample tool created to simplify the process for tribal members and the tribal servicing housing office for their previous years applicants to update any new information in order to carry forward the applications for three additional years, 25 CFR 256.16. Tribes and applicants are not required to use this form, but it was created to ease the tribal members burden in providing updated information in order to maintain program eligibility.

- The first section establishes the current fiscal year, identity of the applicant, and year of their initial application.
- The next section asks if there are any changes in their household size since the previous year; and if so, the identity and relationship of those. This section also asks if there are any changes to their previous year's income; and if so, who, amount of income, and type of income. Lastly, the section asks the applicant to explain any other changes in their living situation; as in, disability, veteran status, and any other situation that may increase or decrease their points/ranking.

- The bottom section is the certification by the applicant that the statements and information included on the HIP Addendum are true.

The Tribal Annual Performance Report (TAPR) Excel workbook file, is a tool created to simplify the process for the tribal servicing housing office to verify eligibility, rank, and rate each application received. It is used solely by the tribal servicing housing office and is the instrument used in conjunction with the HIP Application to screen, identify, document, and select individual American Indian families for this program in accordance with 25 CFR 256.14 (c). The TAPR workbook file requests the following information:

- Profile worksheet: This sheet is the "cover page" which the tribe completes. It identifies their region, tribal identity, their agency, fiscal year, and the name and title of the person submitting the Tribal Work Plan for the tribe. This also contains the Privacy Act and Paperwork Reduction Act statements.
- Form worksheet: This is the form completed by the intake clerk directly from the information provided by the applicants on each HIP Application. This worksheet asks for the date of the application, name of the applicant, and pertinent household information that is required in order to rank and assign points for eligibility. This information includes: household income, age, disability status, number of children, and veteran status of all permanent household members. It also requires the applicants living conditions, such as; if they are homeless, living in overcrowded conditions and if the house is a health and safety issue for the occupants. Once this information is filled in for an applicant, the intake clerk will click on the Transfer button, which auto populates to the Priority List Form and Tribal Part 1 worksheets, and then zeros out to be filled in again for each HIP Application received.
- Priority List Form worksheet: This worksheet is automatically populated by the information input directly from the HIP Applications into the Form worksheet, which provides the tribe with pertinent statistical data for each applicant to assist them in determining the number of bedrooms needed, the square footage of the home, whether a home will need Americans with Disabilities Act compliance, and whether they have all the documents needed for eligibility.
- Tribe Part I worksheet: This worksheet is also automatically populated by the information input directly from the HIP Applications into the Form worksheet, but only includes the applicants name, tribe affiliation, eligibility status, and ranking points. This worksheet is the tribes "Tribal Work Plan." They will input only answers to questions 8a and 8b; which are an estimated start date and estimated project costs for each applicant should that project be funded.
- Tribe Part II worksheet: The top portion of the worksheet will auto populate for questions 1 and 2; however, questions 3 through 7c are completed by the tribe, which tells the region which HIP projects were completed in that fiscal year. The information on this worksheet includes the applicant name, which program category they received, when the project was started and completed, and how much was spent on administrative costs versus construction costs.
- 150 Per Cent worksheet: This is the Federal Poverty Income Guideline table that changes each calendar year when the Health and Human Services publish their

guidelines. Since HIP income requires the applicant be at 150% or lower of this income, the table will change each year.

The HIP Government Performance Results Act (GPRA) Reporting Form is a tool created to simplify the process for the tribal servicing housing office to report the amount of administrative and construction funds spent each quarter of the first fiscal year after receipt of HIP funding. It is used solely by the tribal servicing housing office and is the instrument used to report their activity in accordance with 25 CFR Part 256.14 (d). The GPRA workbook file requests the following information:

- Tribal Profile worksheet: This sheet is the "cover page" that the tribe completes, which identifies their region, tribal identity, fiscal year and quarter, and name and title of the person submitting the Tribal Work Plan for the tribe. This also contains the Privacy Act and Paperwork Reduction Act statements.
- 1st Qtr worksheet: This form is completed by the servicing housing office in order to report on their activity within this quarter. This information includes: the name of the funded recipient, identity of the recipient's category of services, whether their project construction schedule is being met, and how much of the funding has been spent on administrative costs, project costs, and total spent.
- 2nd Qtr, 3rd Qtr and 4th Qtr worksheets: These forms are a repeat of the 1st Qrt worksheet.

The HIP Addendum, TAPR, and GPRA Reporting form have been in use without OMB approval. Tribes requested the regional offices develop automated forms they could easily complete and email back to the region (TAPR and GPRA) or to their applicants (Addendum). There was a lack of communication between the regional offices and central offices that resulted in these forms being in use without OMB approval. As a part of this renewal, the program and BIA are seeking OMB approval for all forms associated with HIP.

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 and specifically how this collection meets GPEA requirements.**

   Forms may be completed and emailed to the Housing Improvement Program. Forms are available for download from the IA Forms website; and the Bureau of Indian Affairs, Office of Indian Services, Division of Human Services, Housing Improvement Program website. *See* www.bia.gov/policy-forms/online-forms and www.bia.gov/bia/ois/dhs/housing-improvement-program.

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.

Much of the data collected is unique to the program and applicant. There are no other programs like HIP due to the income level requirements being much lower than other federal programs. This form establishes a paper trail and documents individual continued eligibility for a federally funded grant program. We have approached other Federal, state, local and private agencies, such as HUD, VA, IHS, USDA, FEMA, Red Cross, other private organizations and lenders to explore the idea of adopting a single application for collecting data from the tribe's general service population; to date, we have not gained any support to establish and use a single application form to determine eligibility for even general individual housing program services.

5. **If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

The information on the forms does not come from small businesses, but from individuals seeking housing assistance. The collection does not impact small businesses or entities.

6. **Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Due to the nomadic nature of our clients because of the severe lack of employment opportunities on many of our reservations, the information that is needed to properly assess an individual for housing services frequently changes each calendar year. Therefore, the need to update an individual HIP applicant's file each fiscal year is necessary. The consequences for not updating the information on at least an annual basis would mean that we would be serving individuals who are ranked lower on the reservation-wide priority waiting list and would be bypassing individuals who would be rated higher or considered more in need for individual housing services.

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 often 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 that can be generalized to the universe of study;**

***   requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
***   that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
***   requiring respondents to submit proprietary trade secrets, 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 will apply to this collection that would require exceptions to 5 CFR 1320.5(d)(2). We only require a yearly update of information, although an applicant who moves may wish to voluntarily update the information more frequently or as needed. Our pledge of confidentiality would be covered by the Privacy Act, as stated on our form.

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 in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A 60-day notice for public comments was published in the Federal Register on September 7, 2021 (86 FR 50153). No comments were received in response to this notice.

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 on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The program discussed this information collection with the following:

- Housing Planner, Hualapai Tribe;
- HIP Coordinator, Colorado River Indian Tribe;
- HIP Coordinator, White Mountain Apache Tribe;
- Housing Manager, San Carlos Apache Tribe; and

- Housing Manager, Hopi Tribe.

Representative were all in agreement that the Application was straight-forward and easily understood. They approved of the current format for the TAPR and GPRA Reporting form; and indicated the simple one-page Addendum aids in the ranking and rating of the applications.

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

No payment or gift is being given to respondents.

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

The information collected is subject to the system of records notice “Indian Housing Improvement Program, Interior, BIA-10” published September 13, 1983 (48 FR 41104).

The Privacy Act statement printed on the HIP Application, Addendum and the Tribal Annual Performance Report (Profile worksheet), BIA Form 6407, provides the assurance of confidentiality. This application is included in the BIA HIP Handbook or processing manual, which is provided at our annual HIP orientation sessions for both BIA and tribal housing staff who are tasked with the administration of this program; they are advised about the confidentiality and the safeguarding of the information provided by the respondents. This format may also be shared more frequently to other individuals and groups who request a presentation of this information at their meetings and workshops.

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.

We do not request any information of a sensitive nature.

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 for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
*** 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.**

We have 7,000 qualified respondents apply annually for this program. Annually, there are an additional 1,000 applicants who do not qualify, making the total 8,000 applicants. The HIP Addendum is submitted by 4,000 respondents annually, the TAPR is submitted by 215 Tribes annually, and the GPRA Reporting Form is submitted by 77 Tribes quarterly. The total number of respondents annually is 12,523, with an annual burden total of 5,185, and a total annual salary burden of $205,067.

Form/Collection	Number of Respondents per Year	Number of Responses per Respondent	Number of Responses per Year	Burden Hour per Response	Total Annual Burden Hours	Salary Burden*
HIP Application	8,000	1	8,000	.5	4,000	$158,200
HIP Addendum	4,000	1	4,000	.25	1,000	$39,550
TAPR	215	1	215	.5	108	$4,271
GPRA	77	4	308	.25	77	$3,045
TOTAL	**12,292**		**12,523**		**5,185**	**$205,067**

* To obtain the hourly rate, the BIA used $39.55, the wages and salaries figure for civilian works from BLS Release USDL-21-2146, Employer Costs for Employee Compensation – issued December 16, 2021, Table 2, Employer costs per hour worked for employee compensation and costs as a percent of total compensation: *Civilian workers*, at www.bls.gov/news.release/pdf/ecec.pdf. This wage includes a multiplier for benefits.

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)
*** 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 and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of**

methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

* **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

*** Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There is no non-hour cost burden to respondents.

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.

Neither the Application nor the Addendum is processed/handled by a Federal employee. They are handled by tribal employees. These burden estimates are included in the above table as part of the burden associated with the TAPR. The total annual salary burden for the government is $28,800.

Form/Collection	GS/Step Level of Federal Employee Processing the Information*	Number of Responses Processed per Year	Burden Hour per Response	Total Annual Burden Hours	Total Salary Burden
TAPR	GS 12/Step 5	215	1	215	$16,781
GPRA	GS 12/Step 5	308	.5	154	$12,020
TOTAL		**523**		**369**	**$28,800**

* This is an average GS Level for all 12 Regional Housing Officers. Using the Office of Personnel Management Salary rate for a GS-12/step 5 is $48.78. To account for benefits, we then multiplied this rate by 1.6, the salary associated with this grade and step is based on the General Schedule 2022. *See* https://www.opm.gov/policy-data-oversight/pay-leave/salaries-

wages/salary-tables/pdf/2022/DCB_h.pdf. This puts the hourly salary at $78.05.

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

Adjustments in costs were made to address wage/salary increases by BLS and OPM.

16. For collections 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.

We will not use the results of the collections for any other purpose but operating the program.

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.

We intend to display the OMB Control Number and the expiration date on the forms and on the cover page of both Excel workbooks.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

We are not seeking any exceptions to the certification statement.