

**36 CFR 800 Supporting Statement for Paperwork Reduction Act Submissions  
Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities  
OMB# 2506-0087**

**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.

HUD-7015.15: 24 CFR Part 58, “Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities,” requires the submission of form HUD-7015.15 – “Request for Release of Funds and Certification.” HUD recipients use this form to certify their compliance with proposed HUD-assisted activities with the National Environmental Policy Act (NEPA), the regulations of the Council on Environmental Quality, related federal environmental laws, executive orders, and authorities, and Part 58 procedures. HUD (or the State for certain State-administered HUD grant programs) approves the certification allowing for the conditionally awarded or formula-allocated funds to be released to the recipient. Various laws that authorize this procedure are listed in 24 CFR 58.1(b).

The Tribal Directory Assessment Tool (TDAT) Interim Updates Request Form (hereinafter “TDAT Form”): The Tribal Directory Assessment Tool (TDAT) is an online database that enables HUD users to access contact information for Tribal Leaders and Tribal Historic Preservation Officers for federally recognized Tribes. Information on both Tribal Leaders and Tribal Historic Preservation Officers is downloaded by HUD from information maintained by the Bureau of Indian Affairs and the National Park Service. Additionally, HUD requests that Tribes provide information in TDAT on geographic areas, delineated by county, within which they believe historic properties may exist and HUD requests that Tribes indicate the types of projects they wish to be notified about. TDAT does not list or identify historic properties. Also, HUD requests Tribes to indicate how they wish to receive project related information (via email or mail, for instance).

TDAT is related to the National Historic Preservation Act, Section 106 Review (36 CFR 800), which is the process by which federal agencies consider the effects of actions that may impact historic properties. 36 CFR 800 is incorporated by reference in 24 CFR 50 "Protection and Enhancement of Environmental Quality and CFR Part 58, “Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities.” It is a federal agency’s responsibility to communicate with Tribes that may identify historic properties within a project’s geographic boundaries and TDAT’s purpose is to expedite and streamline the efforts necessary to identify federally recognized Tribes that may wish to participate in the Section 106 review of agency projects.

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-7015.15: The respondents are HUD recipients who are required to submit form HUD-7015.15. The purpose of the information collection is to document statutory and regulatory compliance by HUD recipients on form HUD-7015.15, which is submitted to HUD (or the State for certain State-administered HUD grant programs) for approval for funds to be released to the recipient.

TDAT Form: The respondents are Tribal Leaders and Tribal Historic Preservation Officers. The purpose of the information is to assist in Section 106 Consultation under 36 CFR 800 by listing the contact information of individuals entitled to comment on projects in their areas of interest.

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-7015.15: Respondents may complete form HUD-7015.15 either on paper or electronically using the HUD Environmental Review Online System (HEROS). Respondents who use HEROS have certain fields autofilled based on information entered elsewhere in the environmental review. Likewise, respondents may submit the form through email or electronically through HEROS. However, HUD is considering a change in policy to require the use of HEROS to complete most environmental reviews and submit the corresponding form HUD-7015.15 electronically.

TDAT Form: Respondents may either submit this information on paper or electronically through the TDAT application. Respondents who use the TDAT application will have the ability to send updated contact information directly to the TDAT administrator for review and this information would directly populate into TDAT. Likewise, respondents may submit the information to the TDAT Administrator through email. However, receiving information by email would create an additional burden as it would need to be copied, formatted, and entered directly into TDAT by the Administrator. The TDAT is a role created by HUD to monitor and implement changes to information on TDAT.

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.

HUD-7015.15: This is not applicable, because there is no similar information already available.

TDAT Form: Similar information may be available on public websites for Tribes and other historic preservation resources. However, this information may not be complete or accurate.

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-7015.15: This collection of information does not impact small businesses or other small entities.

TDAT Form: This collection of information does not impact small businesses or other small 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.

HUD-7015.15: HUD-assisted project or activity. It could not be conducted less frequently, because various environmental and program-implementing statutes require that an environmental review be completed for each HUD-assisted project.

TDAT Form: This collection is necessary to initiate section 106 consultation to consider the effects of HUD actions on properties that are historically significant. If this data is not collected, Tribal contacts for Section 106 would be improperly listed in TDAT and thus would hinder the ability of HUD staff and REs to comply with Section 106. Tribes' participation in TDAT is voluntary.

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; n/a
  - requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; n/a
  - requiring respondents to submit more than an original and two copies of any document; n/a
  - requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years; n/a
  - 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; n/a
  - requiring the use of a statistical data classification that has not been reviewed and approved by OMB; n/a
  - 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 n/a
  - 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.n/a

HUD-7015.15: There are no special circumstances mentioned above that apply to this information collection.

TDAT Form: There are no special circumstances mentioned above that apply to this information collection.

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 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 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 the 60-Day Notice of Proposed Information Collection in the Federal Register on July 7, 2023. The Notice appears on pages 43370 and vol 88. No comments have been received on this Notice.

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

HUD-7015.15: This is not applicable, because HUD does not provide any payment or gifts as remuneration for this information collection.

TDAT Form: This is not applicable, because HUD does not provide any payment or gifts as remuneration for this information collection.

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

HUD-7015.15: HUD-7015.15: The respondent's form HUD-7015.15 submitted to HUD is a public document that must also be made available upon requires to any member of the public, and therefore usage of the form by the respondent provides no assurance of confidentiality under HUD environmental review procedures.

The Privacy Act of 1974 provided privacy protection to respondents. There are no assurances of confidentiality provided.

TDAT Form: The respondent's information submitted to HUD is considered public information and therefore usage of the form by the respondent provides no assurance of confidentiality under HUD's NHPA Section 106 review (36 CFR 800) and environmental review procedures. TDAT does not list historic properties or provide locations of historic properties.

The Privacy Act of 1974 provided privacy protection to respondents. There are no assurances of confidentiality provided.

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.

HUD-7015.15: Form HUD-7015.15 does not involve questions of a sensitive nature as described above.

TDAT Form: TDAT’s online form does not involve questions of a sensitive nature as described above. The form does ask which particular federally-recognized tribe that the respondent represents.

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.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
HUD 7015-15	19,555	1.00	19,555.00	.60	11,733.00	39.63	464,978.79
TDAT Form	233	1.00	233	.25	58.25	27.94	1,627.50
<b>Total</b>	19,788	1	19,788	.85	11,791.25		466,606.50

HUD-7015.15: HUD grants cover all eligible costs including staff work. Hourly cost per response based on hourly mean wage of urban planners working for local government (Bureau of Labor Statistics, <https://www.bls.gov/oes/current/oes193051.htm>).

TDAT Form: Hourly cost per response based on hourly mean wage of historians working for state government (Bureau of Labor Statistics, <https://www.bls.gov/oes/current/oes193093.htm>).

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers 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.

HUD-7015.15: This is not applicable for the following reasons: (1) generally the above listed items do not apply to this information collection; and (2) maintaining a copy of form HUD-7015.15 as part of the recipient's environmental review record is a nominal part of project costs which are eligible for reimbursement under the HUD grant.

TDAT Form: The initial startup cost to implement this form on TDAT is estimated to be \$59,105.60. These are costs that will be paid for entirely by the Federal Permitting Improvement Steering Committee (FPISC), and not HUD. Because the utilization of the TDAT form will represent a time, and thus cost, savings to HUD staff conducting the recordkeeping, there is no additional associated regular HUD staff cost to utilization of the form. Additionally, all costs for completing the form are borne by the respondents; they are not reimbursed or otherwise covered by HUD in any way.

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.

Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
HUD 7015-15	19,555	1.00	19,555.00	.60	11,733.00	39.63	464,978.79
TDAT Form	233	1.00	233	.25	58.25	0	0
<b>Total</b>	19, 788	1	19,788	.85	11,791.25	39.63	464,978.79

HUD-7015.15: Because HUD grants may be used to cover all eligible costs and publication of newspaper notices, the annual cost to respondents is typically borne by HUD. There are no additional costs to HUD beyond the administrative grant used by respondents described in Question 12. Therefore, these tables are identical to reflect that the cost that appears to be borne by respondents is funded through HUD grants.

TDAT Form: HUD has previously allocated staff time to data collection through TDAT and an online form would reduce the required staff time to maintain and update TDAT. This would result in an estimated 20 minutes of staff time saved per respondent. There are no additional costs to HUD to maintain TDAT because of the inclusion of an online form. Thus, because there are no maintenance costs to HUD and the cost to respondents to complete the form is borne entirely by respondents and not HUD, the annualized cost to the federal government for this form is zero.

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

Revision of a previously approved collection. Hourly cost per response based on hourly mean wage of historians working for state government.

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.

HUD-7015.15: This is not applicable, because the collected information is not gathered for publication in the aggregate.

TDAT Form: This is not applicable, because the collected information is not gathered for publication in the aggregate.

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.

HUD-7015.15: Not applicable.

TDAT Form: Not applicable.

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

HUD-7015.15: Not applicable.

TDAT Form: Not applicable.

---

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

Not applicable.