

**Supporting Statement for Paperwork Reduction Act Submissions
Indian Housing Block Grants (IHBG) Program
OMB# 2577-0218**

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.**

This information collection is required to receive applications, and issue and manage grants for the Indian Housing Block Grant (IHBG) program funding (assistance listing number 14.867). HUD uses two methods to allocate IHBG funds among eligible Indian tribes: formula and competition. HUD refers to these allocations as “IHBG Formula” and “IHBG-Competitive.” IHBG Formula is used to allocate equitably and fairly funds made available through NAHASDA among eligible Tribes and TDHEs. The IHBG Competitive grants supplement IHBG Formula funds and are targeted to new housing construction in Native communities. Both programs are managed by HUD’s Office of Native American Programs (ONAP). IHBG is authorized by both the Native American Housing Assistance and Self-Determination Reauthorization Act of 1996 (25 U.S.C. 4101 et seq.) ([NAHASDA](#)), and annual Congressional appropriations; and subject to the regulations at 24 CFR Part 1000.

As required by [2 CFR 25.200\(b\)](#), eligible Tribes and TDHEs organizations for both IHBG Formula and IHBG-Competitive must obtain a UEI and register with SAM.gov, unless exempted under [§ 25.110](#).

IHBG Formula

The IHBG Formula allocation 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 Indian tribes, Alaska Native villages, Tribally Designated Housing Entities (TDHEs), and a limited number of State-recognized tribes that were funded under the Indian Housing Program authorized by the U.S. Housing Act of 1937 are eligible to receive IHBG funds.

Pre-Award: ONAP announces the availability of IHBG Formula funding via Dear Tribal Leader Letter, within 60 days of the enactment of the federal budget. Per [24 CFR 1000.212](#), to receive an IHBG Formula allocation, eligible Tribes or TDHEs must complete and submit an Indian Housing Plan (IHP) or HUD-52737 in the Grants Evaluation and Management System (GEMS). HUD is required, per [24 CFR 1000.230](#), to review the IHP in accordance with [Section 102 of NAHASDA](#) to verify eligibility and program compliance before awarding the allocation. Tribes or TDHEs are notified of the approval of their IHP via GEMS.

Post-Award: Grantees access their funding in LOCCS. At the end of their program year, grantees are required, per [24 CFR 1000.512](#), to complete and submit the Annual Performance Report (APR), which is part of the HUD-52737, reporting the expenditures and progress made. In addition, grantees are required, per [2 CFR 200.328\(a\)](#), to submit an SF-425 or Federal Financial Report detailing federal expenditure for the grant. All expenditures would be included in the annual audit, if an audit is required. Grantees are required to keep records for at least three years from the last expenditure of the grant. IHBG Formula grants are closed when the funds expire.

Other: The IHBG estimated allocations are published annually and detail the data used to calculate each allocation. Grantees may respond to report a change or to correct this data using the HUD-4117: Formula Response Form, specified by [24 CFR § 1000.315\(b\)](#). Depending on the nature of the correction (see [24 CFR 1000.336](#)) one or more of this form's appendices A-D may be used. In addition, IHBG Formula grantees may challenge other formula components using HUD-4119: Challenging U.S. Census Data: Guidelines for IHBG Formula and its appendices A-D.

IHBG-Competitive

Since 2018, Congress has appropriated funding for IHBG-Competitive with the funding appropriations for IHBG Formula. The IHBG-Competitive program (IHBG-COMP) prioritizes projects that increase the availability of affordable housing in Tribal communities with consideration to extent of need and administrative capacity. IHBG-COMP is subject to the same statute and regulations as the IHBG Formula grants. The IHBG-COMP- funds are announced on Grants.gov using an annual notice of funding opportunity (NOFO), as required by 2 CFR 200.204. Tribes or TDHEs are also required to submit applications via Grants.gov.

Pre-Award: In addition to the HUD-wide NOFO application requirements of the SF-424, SF-424D, HUD-2880, and HUD-424B, IHBG applicants must provide a HUD-4123: Cost Summary, a HUD-4125: Implementation Schedule.

Post Award: Grantees access their funding in LOCCS. In addition to the SF-425 required for all federal grantees, IHBG-COMP grantees are required, per [24 CFR 1000.512](#), to report annually on the project's progress using the HUD-53248: IHBG-COMP APR. Grantees are required to keep records for at least three years from the last expenditure of the grant. All expenditures would be included in the annual audit, if an audit is required. IHBG-COMP grants are closed 120 days following the period of performance end date, upon receipt of the final IHBG-COMP APR.

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.**

ONAP uses the application information collected to verify compliance, rate and rank competitive applications, and select competitive applicants for award. ONAP uses post-award information to monitor grantee performance throughout the grant. Additionally, the data collected will be used for annual reporting to Congress. This is a revision of a currently approved collection.

IHBG Formula Documents		
Pre-Award		
1	HUD-52737 IHP/APR	This document is used by IHBG formula grantees to provide HUD with its Indian Housing Plan (IHP). ONAP reviews the IHP to confirm compliance with program requirements prior to awarding the annual IHBG allocation. At the end of its program year, each grantee must use the APR section of the form to report on program accomplishments and expenditures. It is available as a fillable PDF but most grantees use the GEMS for this required reporting.
2	HUD-52737 GEMS IHP/APR	Same as above but available to grantees in the web-based Grants Evaluation and Management System (GEMS).
Post-Award		
3	SF-425: Federal Financial Report	Required for reporting expenditures of all Federal grants.
Other: Formula Data		
4	Formula Response Form HUD-4117	IHBG grantees are notified via an emailed Dear Tribal Leader letter that the estimated IHBG Formula Allocation for the coming fiscal year has been run and are provided with a link to the IHBG Formula Customer Service Center website. The website lists the Formula Response Forms for all IHBG grantees which provides an estimate of the annual allocation, and the data used in calculating the allocation. Grantees can respond with corrections or updates to the data that will be used in the final allocation. Depending on the nature of the data update or correction, the grantee would use one or more of the HUD-4117 appendices A-D described below. Most grantees do not have any updates or corrections to report. Those who do will email or mail the information to the IHBG Formula Customer Service Center.
5	Formula Response Form HUD-4117 Appendix A	This document is used for reporting changes in Formula Current Assisted Stock (FCAS) Units
6	Formula Response Form HUD-4117 Appendix B	This document is used for requesting to add Other Geographies to Formula Area
7	Formula Response Form HUD-4117 Appendix C	This document is used for reporting Enrollment in Overlapping Areas
8	Formula Response Form HUD-4117 Appendix D	This document is used for reporting Tribal Enrollment & Population Cap
9	Census Challenge Form HUD-4119	This document outlines the steps HUD requires for an IHBG grantee to challenge U.S. Decennial Census data used in the Needs component of the IHBG formula.
10	Census Challenge Form HUD-4119 Appendix A	This document outlines the steps HUD required for an IHBG grantee to challenge the Bureau of the Census Population Projections data used in calculating the needs component of the IHBG formula to project Decennial Census person counts or Tribal survey data to the present.

11	Census Challenge Form HUD-4119 Appendix B	This document describes the data and documentation required by HUD for an IHBG grantee to challenge the Total Development Cost (TDC) data used in the FCAS component of the IHBG formula.
12	Census Challenge Form HUD-4119 Appendix C	This document describes the data and documentation required by HUD for an IHBG grantee to challenge the Fair Market Rent (FMR) data used in the FCAS component of the IHBG formula.
13	Census Challenge Form HUD-4119 Appendix D	This document describes the data and documentation required by HUD for a Tribe to challenge the Total Resident Service Area Indian Population (TRSAIP) data used in the Needs component of the IHBG formula.
Authorized Investments		
14	Depository Agreement, Bank Accounts HUD-52736-A	This document is only used by IHBG grantees that HUD has authorized to invest IHBG funds. It describes the bank account depository and investment requirements and agreements between HUD and the federally or state recognized tribe or housing authority. This document requires the signature of the recipient of HUD funds.
15	Depository Agreement, Broker/Dealer HUD-52736-B	This document is only used by IHBG grantees that HUD has authorized to invest IHBG funds. It describes the bank account depository and investment requirements and agreements between HUD and the federally or state recognized tribe or housing authority and the recipient's broker/dealer. This document requires the signature of the broker/dealer.

IHBG-Competitive Forms		
Pre-Award		
1	Application for Federal Assistance SF-424	HUD-wide requirement for competitive applications.
2	Assurances for Construction Programs SF-424D	Required with applications for construction related NOFOs.
3	Applicant Disclosure Report HUD-2880	HUD-wide NOFO application requirement.
4	HUD Applicant/Recipient Assurances and Certifications HUD-424	HUD-wide NOFO application requirement.
5	Cost Summary HUD-4123	This form is used by applicants to provide budget cost information including activity costs, administration, planning, and total resources that will be committed to the project, including resources from both Federal and non-Federal sources. It is assessed by HUD during application review and scoring.
6	Implementation Schedule HUD 4125	This form is used by applicants to provide the tasks, phases, and milestones throughout a project timeline. It is assessed by HUD during application review and scoring.
7	<i>HUD-53246: Obsolete</i>	HUD-53246 will no longer be part of the collection and is being replaced by Form HUD-4123 (OMB no: 2501-0044) to accommodate similar reporting requirements for both the IHBG Comp and ICDBG programs.
8	<i>HUD-53247: Obsolete</i>	HUD-53247 will no longer be part of the collection and is being replaced by Form HUD-4125 (OMB no: 2501-0044) to accommodate similar reporting requirements for both the IHBG Comp and ICDBG programs.

Post-Award		
9	SF-425	Federal Financial Report: Required for all Federal Grants.
1 0	IHBG-COMP APR HUD-53248	This document is used by IHBG-COMP grantees to report progress made on completing the project in accordance with its approved HUD-4125, Implementation Schedule.

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 to adopt this means of collection. Also describe any consideration of using information technology to reduce burden.**

ONAP makes utilization of automated information collection. IHBG Formula recipients submit the Indian Housing Plan/Annual Performance Report (IHP/APR) (HUD-52737) using HUD’s online Grants Evaluation and Management System (GEMS). To access GEMS, grantees will need to set up an account and enter information through the Registration Portal: <https://hud.my.site.com/GEMS/s/login/SelfRegister?locale=us>. GEMS utilizes a one-time signature attestation for the authorized officials to submit electronic signatures in GEMS. The area offices verify and accept registrations submitted in the portal. Once accepted an email with the log-in information will be sent. Both versions of the same form provide advanced automated functionality such as numerous drop-down menus, and fields that perform auto population and calculation. Almost all IHBG Formula grantees submit the IHP via GEMS. However, if a grantee is unable to submit the IHP via GEMS, due to connectivity issues related to remote locals, the form is also available as a fillable PDF.

IHBG-COMP applications are submitted through Grants.gov. Grantees report on program progress and expenditures using the IHBG-COMP APR (HUD-53248) that is a fillable PDF with all the automated functionality described in the fillable PDF above. The grantees submit the IHBG-COMP APR to their assigned Grants Management Specialist via email.

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, or collected by, HUD that duplicate the information identified in this collection.

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

HUD has minimized the burden on small grantees by allowing grantees to determine the scale and complexity of their housing programs. HUD staff are available to provide one-on-one assistance to small grantees if needed.

6. **Describe the consequences 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 grants are authorized by Congress and the information collected is required for ONAP to issue awards, monitor program progress and submit an annual progress report to Congress. If this collection is not approved, ONAP will be out of compliance with its statutory requirements and Tribal communities will not benefit from the available program funds.

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;*

Not applicable.

- *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 study;*

Not Applicable

- *requiring the use of a 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 be recorded, disclosed, or reported.*

HUD published a Notice of Proposed Information Collection for Public Comments in the *Federal Register*, Volume 90; No. 80; Page 17611 on April 28, 2025. The public was given until June 27, 2025, to submit comments on the proposed information collection. HUD received no comments on this proposed collection.

- *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.*

Not Applicable.

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. If the collection requires a system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.**

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.**

Not Applicable.

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 the chart below; 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 total number of respondents for all forms included in this collection is 3,390. This represents the number of respondent Tribes and Tribally Designated Housing Entities (TDHE) for IHBG Formula and IHBG-COMP, excluding record retention.

Information Collection	Number of Respondents	Frequency of Response	Responses per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Application for Federal Assistance SF-424 (2501-0044)	300	1	1	0	0	0	0
Assurances for Construction Programs SF-424D (2501-0044)	300	1	1	0	0	0	0
Federal Financial Report SF-425 (2501-0044)	300	1	1	0	0	0	0
Applicant Disclosure Report HUD -2880 (2501-0044)	300	1	1	0	0	0	0
HUD Applicant/Recipient Assurances and Certifications HUD-424 (2501-0044)	300	1	1	0	0	0	0
Formula Response Form HUD-4117	500	1	500	2	1,000	\$45.14	\$45,140.00

Formula Response Form HUD- 4117 Appendix A	50	1	50	2	100	\$45.14	\$4,514.00
Formula Response Form HUD- 4117 Appendix B	50	1	50	2	100	\$45.14	\$4,514.00
Formula Response Form HUD- 4117 Appendix C	50	1	50	2	100	\$45.14	\$4,514.00
Formula Response Form HUD- 4117 Appendix D	50	1	50	2	100	\$45.14	\$4,514.00
Census Challenge Form HUD-4119	15	1	15	150	2,250	\$45.14	\$101,565.00
Census Challenge Form HUD-4119 Appendix A	15	1	15	10	150	\$45.14	\$6,771.00
Census Challenge Form HUD-4119 Appendix B	15	1	15	10	150	\$45.14	\$6,771.00
Census Challenge Form HUD-4119 Appendix C	15	1	15	15	225	\$45.14	\$10,156.50
Census Challenge Form HUD-4119 Appendix D	15	1	15	10	150	\$45.14	\$6,771.00
Cost Summary HUD-4123	300	1	300	40	12,000	\$45.14	\$541,680.00
Implementation Schedule HUD-4125	300	1	300	40	12,000	\$45.14	\$541,680.00
Depository Agreement, Bank Accounts HUD– 52736–A	15	1	15	1	15	\$45.14	\$677.10
Depository Agreement, Broker/Dealer HUD– 52736–B	15	1	15	1	15	\$45.14	\$677.10
HUD–52737 IHBG IHP-APR	20	2	40	62	2,480	\$45.14	\$111,947.20
HUD-52737 GEMS IHG IHP/APR	370	2	740	62	45,880	\$45.14	\$2,071,023.20
HUD–53248 IHG- COMP APR	65	1	65	30	1,950	\$45.14	\$88,023.00
Record retention	30	1	30	1	30	\$45.14	\$1,354.20

Totals	3,390	25	2,280	442	78,695	\$45.14	\$3,552,292.30
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The total annual burden of this collection is expected to be 78,695 hours. The total estimated annual cost for this information collection is \$3,552,292.30. To estimate the hourly cost per respondent, HUD used the Department of Labor Bureau of Labor Statistics' most recent (May 2024) on the State and local government workers by occupational and industry group <https://data.bls.gov/oesprofile/> we estimate these members of the Federal, State and local government Financial Specialists, All Other, professional series, to have an average hourly rate to be \$45.14.

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 already reflected on the burden worksheet shown in Items 12 and 14).

There are no additional costs to respondents or recordkeepers aside from what is reported in Items 12 and 14.

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 expenses 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 estimated levels of effort are based on recent discussions with ONAP staff and their interactions with tribes and tribally designated housing entities. The estimated hours rate of \$40.54/hour represents the FY 2025 GS-11, Step 1 schedule for an Area ONAP and the \$57.78/hour represents the FY 2025 GS-13 Step 1 schedule for HQ ONAP.

Information Collection	Number of Respondents	Frequency of Response	Responses per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Application for Federal Assistance SF-424 (2501-0044)	300	1	1	0	0	0	0
Assurances for Construction Programs SF-424D (2501-0044)	300	1	1	0	0	0	0
Federal Financial Report SF-425 (2501-0044)	300	1	1	0	0	0	0
Applicant Disclosure Report HUD -2880 (2501-0044)	300	1	1	0	0	0	0

HUD Applicant/Recipient Assurances and Certifications HUD-424 (2501-0044)	300	1	1	0	0	0	0
Formula Response Form HUD-4117	500	1	500	2	1,000	\$57.78	\$57,780.00
Formula Response Form HUD 4117 Appendix A	50	1	50	2	100	\$57.78	\$5,778.00
Formula Response Form HUD 4117 Appendix B	50	1	50	2	100	\$57.78	\$5,778.00
Formula Response Form HUD 4117 Appendix C	50	1	50	2	100	\$57.78	\$5,778.00
Formula Response Form HUD 4117 Appendix D	50	1	50	2	100	\$57.78	\$5,778.00
Census Challenge Form HUD-4119	15	1	15	150	2,250	\$57.78	\$130,005.00
Census Challenge Form HUD-4119 Appendix A	15	1	15	10	150	\$57.78	\$8,667.00
Census Challenge Form HUD-4119 Appendix B	15	1	15	10	150	\$57.78	\$8,667.00
Census Challenge Form HUD-4119 Appendix C	15	1	15	15	225	\$57.78	\$13,000.50
Census Challenge Form HUD-4119 Appendix D	15	1	15	10	150	\$57.78	\$8,667.00
Cost Summary HUD-4123	300	1	300	40	12,000	\$40.54	\$486,480.00
Implementation Schedule HUD-4125	300	1	300	40	12,000	\$40.54	\$486,480.00
Depository Agreement, Bank Accounts HUD-52736-A	15	1	15	1	15	\$40.54	\$608.10
Depository Agreement, Broker/Dealer HUD-52736-B	15	1	15	1	15	\$40.54	\$608.10
HUD-52737 IHBG IHP-APR	20	2	40	62	2,480	\$40.54	\$100,539.20
HUD-52737 GEMS IHBG IHP/APR	370	2	740	62	45,880	\$40.54	\$1,859,975.20

HUD-53248 IHBG-COMP APR	65	1	65	30	1,950	\$40.54	\$79,053.00
Record retention	30	1	30	1	30	\$40.54	\$1,216.20
Totals	3,390	25	2,280	442	78,695		3,264,858.30

15. Explain the reasons for any program changes or adjustments reported in Items 12 and 14 of the Supporting Statement.

- This is a revision of a currently approved collection.
- HUD-4123: Cost Summary (OMB no: 2501-0044) replaced HUD-53246
- HUD-4125: Implementation Schedule (OMB no: 2501-0044) replaced HUD-53247
- Estimated hours per response for both respondents and reviewers were corrected; specifically for Formula forms HUD-4117 and 4119. While every grantee is provided with a HUD-4117, relatively few utilize it annually for requesting adjustments to formula data. Fewer utilize the HUD-4119 to challenge formula data.
- Collection also makes clear the full burden associated with the grant life cycle.

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 HUD to prepare an annual report to Congress and the information gathered in this collection will be used to prepare that report. HUD is required to include a description of the progress made in accomplishing the objectives of the IHBG Formula and IHBG-COMP programs grants and to summarize the use of funds during the preceding 12-month period and at the end of the period of performance.

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

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

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.