

OMAHA TRIBE OF NEBRASKA

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Notice of Proposed Information Collection – Indian Housing Block Grant (IHBG) Program (OMB #2577-0218)

U.S. Department of Housing and Urban Development (HUD), Office of Native American Programs (ONAP)

July 25, 2025

The Omaha Tribe has actively participated in USDA programs designed to alleviate food insecurity and support community resilience. One critical resource is the Food Distribution Program on Indian Reservations (FDPIR), which the Tribe administers to provide USDA commodities to income-eligible Tribal citizens living on or near the reservation. FDPIR is a vital nutrition lifeline for many Native households who lack access to grocery stores and other Supplemental Nutrition Assistance Program (SNAP) services due to geographic and economic barriers.

USDA-supported food programs have been essential in helping the Omaha Tribe reduce health disparities, increase access to traditional and healthy foods, and revitalize foodways deeply connected to cultural identity and intergenerational knowledge. As the Tribe continues to expand its efforts through initiatives like Omaha Nation Farms, access to USDA funding and streamlined reporting requirements will be essential to strengthening food sovereignty and achieving long-term self-determination goals.

The Omaha Tribe of Nebraska appreciates the opportunity to submit comments on the proposed reinstatement and modification of the Indian Housing Block Grant (IHBG) Program information collection (OMB Control Number 2577-0218). As a federally recognized Tribal Nation, the Omaha Tribe participates in the IHBG Formula and Competitive grant programs to address the critical housing and infrastructure needs of our citizens.

Our comments respond to HUD's request for input under Section B of the Federal Register Notice:

1. Necessity and Practical Utility of the Information Collection

The Omaha Tribe recognizes the importance of performance reporting, transparency, and compliance to ensure that IHBG funds are administered effectively. However, the scope and volume of the proposed data collection requirements—particularly the level of detail in appendices, census challenge forms, and multiple performance templates—poses a significant administrative burden, particularly for smaller Tribal housing departments.

While some forms have utility (e.g., the IHP/APR for planning and accountability), others (such as the lengthy Census Challenge and multiple appendices) are duplicative or may not align with Tribal timelines

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or data availability. HUD should reassess whether each form is essential or if reporting could be streamlined.

2. Accuracy of Burden Estimates

The estimated annual burden of over 78,000 hours and \$3.5 million in personnel costs is alarming and significantly underrepresents the real-world burden placed on Tribal housing staff. For many Tribes, including the Omaha Tribe, the staffing and technical capacity to complete and submit dozens of forms—some of which require geospatial data, financial reconciliation, and federal systems integration—may not exist without outside consultant support, which is costly and strains already limited resources.

HUD should re-evaluate the burden calculation, particularly the time estimates associated with forms like HUD-4123 (Cost Summary), HUD-4125 (Implementation Schedule), and the HUD-52737 GEMS IHP/APR, which can take multiple staff several weeks to complete.

3. Enhancing Quality, Utility, and Clarity

To enhance the utility and clarity of this data collection effort, HUD should:

- Consolidate overlapping forms (e.g., combining census challenge appendices into a unified data narrative format);
- Provide plain language instructions and templates that reflect best practices and examples from Tribal housing programs;
- Offer early access to technical assistance for Tribes participating in IHBG-COMP and clarify the crosswalk between formula and competitive program requirements;
- Develop automated tools or dashboards to track required data and reduce duplicate entry across systems like GEMS and IDIS.

4. Minimizing Burden Through Technology and Flexibility

HUD should explore alternative approaches to reduce burden, including:

- Expanding integration with existing Tribal data systems, including housing management software and financial accounting platforms;

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- Increasing compatibility with Microsoft Excel and Word for offline draft preparation of forms;
- Allowing flexible submission timelines for Tribes with limited staff, especially those with overlapping federal reporting obligations (e.g., Treasury, BIA, EPA, USDA, etc.);
- Providing pre-populated data fields where feasible (e.g., demographic baselines, carryover balances) to reduce redundancy;
- Funding regional peer learning or tribal consortia models to support shared data collection services.

Additional Considerations

The Omaha Tribe also emphasizes that Tribal housing program operations are tied to broader issues of self-determination, community wellbeing, and environmental justice. Our Tribal lands have suffered historical environmental harms—much of which occurred prior to NEPA and modern regulatory safeguards—which constrained development and worsened housing conditions. Therefore, IHBG program flexibility must remain a priority, allowing Tribes like ours to use funds to remediate legacy harms, improve climate resilience, and invest in culturally rooted housing solutions.

Finally, HUD must uphold the principles of Tribal consultation and co-design in all data collection and program development processes to honor the trust and treaty responsibilities of the federal government, including those established in the Omaha Tribe's 1854 treaty with the United States.

Conclusion

The Omaha Tribe of Nebraska supports efforts to ensure accountability and performance within the IHBG program but urges HUD to significantly reduce administrative burden, improve automation and interoperability, and respect the diverse capacities and circumstances of Tribal Nations. We stand ready to work in partnership with ONAP to modernize data systems in a way that centers Tribal sovereignty, efficiency, and housing justice.


Cheyenne Robinson, Secretary
Omaha Tribe of Nebraska