



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

SENT VIA ELECTRONIC MAIL

March 3, 2026

Omaha Tribe of Nebraska
Secretary Cheyenne Robinson
497 Main Street
P.O. Box 368
Macy, Nebraska 68039
Email: Cheyenne.Robinson@theomahatribe.com

Dear Secretary Robinson,

The Office of Native American Programs received Omaha Tribe of Nebraska's July 25, 2025 response to the Notice of Proposed Information Collection for Public Comments in the *Federal Register*, Volume 90; No. 80; Page 17611 on April 28, 2025. Although your letter was received after the June 27, 2025 comment deadline, your comments on the proposed information collection, and our responses to them, will be published in the Final Notice.

We thank you for your thoughtful and detailed feedback on the Proposed Information Collection OMB #2577-0218 Indian Housing Block Grant (IHBG) Program. In response to the public comments, we summarized and addressed your comments and recommendations as listed below.

Overall Summary. The commenter urged HUD to respect the diverse capacities and circumstances of Tribal Nations by significantly reducing administrative burden of data collection through assessment of necessity and improved automation and interoperability with other Tribal housing systems and reporting.

HUD response: HUD appreciates the comments and suggestions from the commenters, as further detailed below. HUD is in the process of revising the IHBG Formula forms to improve plain language readability and is exploring options to modernize how the Formula data is collected.

Administrative Burden. The commenter suggested that HUD re-evaluate the burden estimates and assess ways to reduce the time required for each form and eliminate duplicative reporting.

HUD response: HUD appreciates the comment. The estimated burden hours were assessed and updated from the prior 2022 collection, to be more accurate in this revision of the collection. Please note that many of the forms in this collection are not required of all IHBG Formula recipients. For example, the Formula Response Forms are only utilized voluntarily, based on a recipient's choice to request

adjustment to their formula data. Submitting a Census data challenge or requesting to expand a recipient's formula service area would require significant burden hours to prepare. However, these are rare actions. Most IHBG Formula recipients do not respond to their annual Formula allocation data.

Enhancing quality, utility, and clarity. The commenter suggests consolidating forms like the Census Challenge Form (HUD-4119) with its four appendices into a single form with narrative plain language instructions and practical examples and providing technical assistance for IHBG Formula and IHBG Competitive.

HUD Response: HUD appreciates the commenter's recommendations to consolidate overlapping forms, provide plain language instructions and templates, and offer early access to technical assistance for Tribes preparing a Census Challenge submission.

HUD recognizes that the Census Challenge Guidelines and Appendices are technical in nature because they are designed to replicate, to the extent practicable, the methodology used by the U.S. Census Bureau in its data collection processes. This level of technical detail is necessary to ensure that alternative data submitted by a Tribe or Tribally Designated Housing Entity (TDHE) is reliable, verifiable, and comparable for formula allocation purposes. At the same time, HUD acknowledges that these materials could better serve Tribal communities by reducing unnecessary complexity and improving clarity.

Accordingly, HUD is undertaking an initiative to revise the Census Challenge Guidelines and Appendices, as well as the Formula Response Form and its Appendices, consistent with plain language principles. The goal of this effort is to improve organization, clarity, and usability while maintaining compliance with regulatory requirements and preserving the integrity of the allocation formula. HUD anticipates making simplified versions of these documents available next year.

HUD will also consider whether certain appendices or narrative components may be streamlined or consolidated where appropriate, provided that such revisions continue to meet regulatory standards under 24 CFR part 1000, subpart D.

HUD provides ongoing technical assistance for IHBG Formula through the IHBG Formula Customer Service Center and encourages Tribes and TDHEs to seek early engagement when considering a Census Challenge. Early coordination can help clarify requirements, identify appropriate methodologies, and reduce unnecessary burden during preparation of a submission.

Training and technical assistance for the IHBG Competitive program is available through Area Office of Native American Programs.

Interoperability. The commenter suggested that HUD develop automated tools or dashboards to track and pre-populate required data and reduce duplicate entry across current reporting systems like the HUD Office of Native American Programs' (ONAP) Grants Evaluation and Management System (GEMS), the HUD Office of Community Planning and Development's (CPD) Integrated Disbursement and Information System (IDIS), and privately owned Housing Data Systems (HDS). In addition, the commenter recommended increasing compatibility with Microsoft Excel and Word for offline draft preparation of forms.

HUD Response: HUD appreciates this comment and will continue to improve system and software compatibility to ease administrative burden.

Consideration of other federal Tribal grant application and reporting deadlines. The commenter recommended that HUD consider the administrative burden of other federal funding programs that Tribes rely on when establishing reporting and application deadlines.

HUD response: HUD appreciates this comment and, where feasible, will stagger reporting and application deadlines. However, most reporting deadlines are statutory requirements linked to fiscal year ends, as established by law, which HUD is unable to adjust.

Shared data collection. The commenter recommended that HUD fund training and technical assistance on regional peer-shared or Tribal consortia data collection to educate on data collection requirements, means, and support shared data collection and maintenance.

HUD response: HUD appreciates this comment and will assess how this may be addressed through technical assistance or in partnership with regional Tribal organizations.

The Final Notice is expected to be published in the Federal Register in the next few months. We appreciate the opportunity to improve HUD's Tribal Housing programs based on your considered feedback.

Sincerely,

A handwritten signature in black ink, appearing to read 'ERF', with a long horizontal flourish extending to the right.

Erna F. Reeves

Director, ONAP Office of Grants Management