

ASSESSMENT OF NATIVE AMERICAN, ALASKA NATIVE, AND NATIVE HAWAIIAN HOUSING NEEDS: SUPPORTING STATEMENT FOR REQUEST FOR CLEARANCE: PART A

Updated February 17, 2012 (originally submitted July 14, 2011)

Prepared for:

Office of Policy Development and Research

U.S. Department of Housing and Urban Development

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JUSTIFICATION

This supporting statement provides detailed information on proposed data collection associated with the congressionally-mandated assessment of Native American, Alaska Native, and Native Hawaiian Housing Needs. The project is a housing needs assessment that will produce national-level estimates of housing needs in U.S. tribal areas. The 2.5-year study is being conducted by the Urban Institute (UI) with support from three subcontractors — NORC at the University of Chicago; Econometrica, Inc.; and Support Services International (SSI) — for the Office of Policy Development and Research, U.S. Department of Housing and Urban Development (HUD).

The goals of the proposed study are to provide clear, credible, and consistent information describing the needs of the Native American, Alaska Native, and Native Hawaiian populations with respect to both their housing conditions and socio-economic situations. The proposed data collection and analyses will be used to inform policy in ways that enable tribes to more effectively use resources to improve housing conditions. UI performed a similar assessment in 1996, prior to the passage of the Native American Housing Assistance and Self-Determination Act (NAHASDA) of 1996 that fundamentally changed the way federal funding is delivered to tribal people. Issues surrounding the changes NAHASDA introduced also are a key part of the proposed study.

A1. Circumstances that make the collection of information necessary

Congress has mandated a study of Native American, Alaska Native, and Native Hawaiian Housing Needs (see Senate Report 111-069)¹ because the extent of problems experienced by these populations is not well quantified despite general recognition of severe conditions and challenges such as overcrowding, poverty, unemployment, low household incomes, a rapidly growing population, and lack of infrastructure. Additionally, the Secretary of HUD has made research regarding the housing needs of native populations a priority.

The U.S. government has a trust responsibility to Native American peoples emanating from treaties negotiated with Indian tribes, related federal statutes, court decisions, executive agreements, and other national policies dating from the early 1800s. As a fiduciary trustee, the

¹ http://thomas.loc.gov/cgi-bin/cpquery/?&dbname=cp111&sid=cp111YK8s0&refer=&r_n=sr069.111&item=&&&sel=TOC_516889& Accessed June 30, 2011.



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federal government has a duty to protect tribes as beneficiaries; this responsibility extends to areas such as health care, education, natural resources, and housing.

Congress addressed housing needs of low-income Americans under the U.S. Housing Act of 1937; in 1961, Indian tribes became eligible for assistance under programs operated by HUD. Subsequently, in 1996, the Native American Housing Assistance and Self-Determination Act (NAHASDA) consolidated multiple federal housing assistance programs into a single block grant for Indian tribes or tribally designated housing entities (TDHEs) to provide affordable housing for low-income families residing on reservations or in tribal areas. NAHASDA was amended on October 14, 2008, and reauthorized through FY 2013. The Native American Housing Block Grant (NAHBG, also known as the IHBG) program was funded at \$645 million for FY 2009, while the Native Hawaiian Housing Block Grant was funded at \$10 million for FY 2009.

The data collection described in this document will provide critical information that replicates, updates, and extends beyond the assessment performed by UI for HUD more than a decade ago (i.e., in 1996 prior to the enactment of NAHASDA). The 1996 study clearly documented that the housing problems of American Indians and Alaska Natives were more severe than those experienced by non-Indians in all regions of the U.S. Additionally, it showed that, while earlier HUD had made important contributions to housing conditions for native populations, programs nonetheless had serious defects that could be mitigated (for example, by introducing a block grant approach, a study recommendation that informed policy discussions and led to the implementation of that model under the NAHASDA).

The current study will use quantitative and qualitative methods and multiple data sources to fully assess the housing needs of American Indians, Alaska Natives, and Native Hawaiians (AIAN and NH). The study will analyze secondary data sources (including data files from the U.S. Bureau of the Census and HUD administrative data files) to describe overall population characteristics, geographic locations, and economic conditions of the included populations. Understanding what secondary data can tell us about AIAN and NH housing needs is critical, but cannot substitute for direct learning about actual conditions on the ground as seen through the eyes of residents and program administrators. Direct observation of housing conditions is also essential. This supporting statement requests approval for the following new data collection: 1) an in-person household survey, including direct observations of housing conditions; 2) a survey of tribal housing offices and Tribally Designated Housing Entities (TDHEs), the entities that administer the Indian Housing Block Grant program under NAHASDA; 3) in-person interviews with TDHE officials, tribal leaders, other housing officials and program



staff, and community leaders; 4) a web-based survey of tribal housing offices/TDHEs;² 5) telephone interviews and case studies (including in-person interviews and discussion with residents) about Indian communities in urban areas; 6) telephone interviews with lenders that originate home loans in Indian country; and 7) telephone interviews with housing officials, community based organizations of homeland residents, and representatives of other stakeholder organizations in Hawaii.

A2. How, by whom, and for what purpose the information is to be used

The Urban Institute and its subcontractors (NORC at the University of Chicago, Econometrica and SSI) are responsible for the design, data collection,³ and analysis for the Assessment of Native American, Alaska Native, and Native Hawaiian Housing Needs. UI will report its findings to HUD 's Office of Policy Development and Research, which, in turn, will report this information to Congress, cognizant representatives of the affected communities, and the general public.

Project Overview

The evaluation involves multiple research methods to produce valid evidence that constitutes a comprehensive overview of the housing situation of most American Indians, Alaska Natives, and Native Hawaiians based on socio-economic data available from the Census and independent research about housing needs. The study is intended to inform policy in ways that enable tribes to more effectively use resources to improve housing conditions. Key topics of interest include:

- Whether housing problems and living conditions have improved or worsened over time.
- The kinds of diversity in living and economic conditions that are observed using 2000 and 2010 Census data.
- The effect(s) that implementation of NAHASDA has had on housing needs; for example, whether as many families are served; if housing conditions such as quality, crowding, and affordability are similar in HUD or other assisted units after implementation of NAHASDA; or whether the new funding strategy has created opportunities for leveraging other financial resources.

² The web-based survey will be conducted by HUD staff.

³ Except for the web-based survey which will be conducted by HUD staff.



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How the Information Will be Used

The report will be used to inform Congress and federal policymakers, as well as tribal leaders, about the housing needs and conditions on reservations, tribal lands and native villages.

Who Will Collect the Information

The household survey and tribal housing office/TDHE telephone survey will be managed by NORC. Tribal members will be hired locally to conduct the in-person interviews for the household survey. The site visits and in-person interviews will be conducted by staffs of the Urban Institute and subcontractors. The lender survey and data collection pertaining to Native Americans residing in urban areas will be conducted by Urban Institute staff and consultants. All of the information collection and analysis pertaining to Native Hawaiians will be conducted by Econometrica, Inc. The web-based survey of tribal housing officials/TDHEs will be conducted by HUD staff.

Purpose of the Data Collection

The study will yield two major volumes and a separate memorandum to HUD: the first volume will cover the circumstances of American Indians and Alaska Natives with findings in three main areas:

- The determinants of housing needs, emphasizing trends in demographic, social, and economic conditions.
- Housing conditions and needs.
- Housing policies and programs, focusing on the role of NAHASDA.

The second volume will address the housing conditions and needs of Native Hawaiians. A separate memorandum will respond to questions about the Indian Housing Block Grant (IHBG) Formula.



Data Collection Procedures

The study will require the collection of information from three main types of sources, as detailed below. OMB clearance is requested for activities referenced under Primary Data Collection.

Literature Reviews and Discussions with Experts. Discussions will be held with people knowledgeable about conditions and trends in Indian Country and about the evolution of the policy environment, particularly with respect to housing and housing services. Such experts include officials from HUD (most particularly, its Office of Native American Programs - ONAP), the Bureau of Indian Affairs, and the Bureau of the Census; key leaders from the Regional Tribal Associations; and representatives of key interest groups (such as the National American Indian Housing Council [NAIHC] and the National Congress of American Indians).

Data from Secondary Sources. There are three major sources for the secondary data that will be used in this study.

- The first and most extensive will be data files from the, **U.S. Bureau of the Census**. These will include: (1) both long-form and short-form (SF1 and SF3) data from the 2000 decennial census; (2) data from the American Community Survey (ACS) - 1 year data as of 2009 for counties and larger areas, 2005-09 5-year data for AIAN areas and other smaller geographies; (3) data from the 2010 decennial census (SF1 file for all relevant geographies); (4) special tabulations of the 5-year ACS created for HUD on housing problems of Native Americans; and (5) data for selected areas from the American Housing Survey.
- The second category is composed of various **HUD administrative data files**. These include files maintained by ONAP (e.g., records on TDHEs, on the status of HUD assisted housing in AIAN areas, on performance and financial information related to the Indian Housing Block Grant (IHBG). They also include data files related to implementation of the IHBG allocation formula.
- The third category is made up of a series of **national data files for small areas maintained by the Urban Institute**, which will be used for analysis of changing conditions in AIAN tribal areas and other places of AIAN residence.



Primary Data Collection. Proposed primary data collection, for which OMB approval is sought, includes seven components, the first three of which will be conducted in AIAN tribal areas:

- A major **in-person household survey** in 40 sampled AIAN tribal areas (targeted to complete observations and interviews in 1,280 housing units). These interviews will be conducted by tribal members who have been recruited and trained for this purpose by NORC. They will include observations of housing conditions, and interviews with heads of households, focused on how they view their own housing conditions and their views on assisted housing programs.
- **A survey of Tribal Housing Offices and Tribally Designated Housing Entities (TDHEs)**, the entities that administer the Indian Housing Block Grant program under NAHASDA. We will survey a national sample of TDHEs in 104 tribal areas by telephone. The survey will emphasize experience with programs and policies, but also cover views on changing problems and needs.
- More in-depth **in-person interviews with tribal leaders, housing officials, and community leaders** in 24 of the 40 tribal areas selected for the household survey. In addition to the topics addressed in the Tribal/TDHE telephone survey, these interviews will provide more extensive qualitative information on local institutional arrangements, particularly as they relate to housing, housing problems and the implementation of housing programs. The interviews will ask about challenges in providing and maintaining housing, and effective or promising practices for addressing challenges.
- **A web-based survey of tribal housing offices/TDHEs.** Resource limitations and the need to maintain a nationally representative sample of tribal housing offices/TDHEs limits the number of tribes that can be included in the telephone survey of tribal housing offices/TDHEs. In outreach sessions sponsored by ONAP that included discussion of this study, tribes expressed an interest in expanding participation in the survey, so that all tribes could be included. In response, HUD is considering adapting the tribal/TDHE telephone survey for the web. This web-based survey would be administered by HUD staff. Since the instrument, respondents, and use of the data collected are integrally related to the work being conduct by UI and its subcontractors, HUD is seeking approval for the web-based data collection as part of this supporting statement.



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- **Site visits to five urban areas with concentrations of Native American populations and telephone interviews with staff at Urban Indian Community Centers and other informed individuals in other urban areas.** Primary data collection efforts will focus on issues such as factors that affect residential location decisions among AIAN households living in urban areas and the challenges people face in finding and affording decent housing. Data sources will include telephone interviews with Indian Community Center (ICC) staff in select areas and HUD staff in select regional offices and at headquarters for 30 sites. For case study sites, the contractor will conduct in-person interviews with key stakeholders that are members of, or otherwise involved with, the AIAN community, and will hold small group discussions with adult AIAN community members.
- **Telephone interviews with** lenders that originate home loans in Indian Country. To ensure that we receive information from lenders that originate a relatively large number of loans on Indian land, we will select a purposive sample of 30-35 lenders, including: approved Section 184 Program lenders (primary focus); tribe-owned credit unions; Native American CDFIs; and lenders using funds financed through state housing finance agency (HFA) initiatives.
- **Telephone interviews concerning the assessment of Native Hawaiian housing needs.** The only direct housing funding for Native Hawaiians is under the Native Hawaiian Housing Block Grant, which is administered by the Department of Hawaiian Homelands, and they will be the focus of our data collection. Primary data collection for the Hawaii study component will consist of three semi-structured telephone interview instruments. Respondent populations for these surveys are: managers and administrators within the Department of Hawaiian Homelands (DHHL), Presidents/Executive Directors of Native Hawaiian Homestead Associations, and representatives of stakeholder organizations such as representatives of the Office of Hawaiian Affairs (OHA), research centers at the University of Hawaii, social service agencies, churches serving the NH population, community development organizations that have extensive experience working with the NH population, mortgage and financial organizations with experience working with the NH population, and foundation representatives.



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The data collection instruments are presented in Appendix A. Table 1 shows how each of these data collection instruments, along with existing data, will be used to address the four study issues. Please note also that the Census and HUD administrative data referenced in Table 1 do **not** constitute new data collection efforts for this evaluation.



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Table 1. Summary of Research Questions and Data Collection for Native Americans and Alaska Natives

Research Questions and Data Collection Topics	DATA SOURCES AND RESPONDENTS									
	Primary Data						Secondary Data			
	Household Survey	Enumerator/Walkthrough	Telephone Surveys		In-Person Interviews		Telephone Interviews: Urban Indian Community Center and PHA Staff	Decennial Census and American Community Survey	HUD Admin Data	Other Admin Data
TDHEs			Lenders	TDHE Officials, Tribal Leaders, Program Staff	Urban Indian Community Center, PHA, and Program Staff, Participants (discussion groups)					
Sample Size	1,600 total	1,600 total	104	35	8-10 Per Site	4-6 interviews Per Site 1 group per site (10 per group)	25	Not Applicable		
Response rate at 80%	1,280 total	1,280 total	n/a	n/a	n/a	n/a	n/a	Not Applicable		
Scope	40 tribal areas	40 tribal areas	national sample	National sample	24 tribal areas	5 case study cities	National sample	National		
Federal Issues/NAHASDA										
Implications of NAHASDA on current housing stock and living conditions			X		X					
Effects of funding change on housing needs and quality, on leveraging opportunities			X	X	X				X	
Effects of NAHASDA on housing needs--# served, quality, crowding, affordability	X	X	X	X					X	
HUD and other federal housing programs serving tribal people			X	X	X	X	X		X	



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TDHEs			Lenders	TDHE Officials, Tribal Leaders, Program Staff	Urban Indian Community Center, PHA, and Program Staff, Participants (discussion groups)					
Sample Size	1,600 total	1,600 total	104	35	8-10 Per Site	4-6 interviews Per Site 1 group per site (10 per group)	25	Not Applicable		
Response rate at 80%	1,280 total	1,280 total	n/a	n/a	n/a	n/a	n/a	Not Applicable		
Scope	40 tribal areas	40 tribal areas	national sample	National sample	24 tribal areas	5 case study cities	National sample	National		
Indian Housing Block Grant (IHBG) Formula Issues										
Service areas and improved ways of addressing geographies claimed by overlapping tribes			X		X			X	X	
Accuracy of formula calculation in measuring housing need	X							X		
Implication of multiple race reporting in Census								X	X	
Census data collection process								X		
Demography, Geography, Economy										
Population growth since 1996 study			X		X			X		
Diversity in living and economic conditions-changes over time			X		X	X	X	X	X	



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Response rate at 80%	1,280 total	1,280 total	n/a	n/a	n/a	n/a	n/a	Not Applicable		
Scope	40 tribal areas	40 tribal areas	national sample	National sample	24 tribal areas	5 case study cities	National sample	National		
Social and economic conditions	X	X	X		X	X	X	X	X	
Diversity in living conditions across tribal areas	X	X	X		X	X		X		
Economic diversity across tribal areas/major industries and employers			X		X			X		X
Effects of gaming	X		X		X					X
Housing Issues										
Changes in living conditions since 1990 Census	X	X	X		X	X	X	X	X	
Major housing problems and needs	X	X	X		X	X	X	X		
Issues and conditions leading to greater housing needs	X		X		X					
Appropriate standards for housing needs and problems	X	X	X		X			X	X	



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TDHEs			Lenders	TDHE Officials, Tribal Leaders, Program Staff	Urban Indian Community Center, PHA, and Program Staff, Participants (discussion groups)					
Sample Size	1,600 total	1,600 total	104	35	8-10 Per Site	4-6 interviews Per Site 1 group per site (10 per group)	25	Not Applicable		
Response rate at 80%	1,280 total	1,280 total	n/a	n/a	n/a	n/a	n/a	Not Applicable		
Scope	40 tribal areas	40 tribal areas	national sample	National sample	24 tribal areas	5 case study cities	National sample	National		
Types of housing structures; constraint on building types	X	X	X		X					
Land use issues and practices			X	X	X					
Assisted vs. unassisted units	X	X	X		X				X	
Rental vs. ownership	X	X	X	X					X	X
Lending issues and the current financial crisis			X	X	X					X



A3. Use of automated electronic, mechanical or other technological collection techniques to reduce burden

With the exception of the web-based survey of tribes/TDHES to be conducted by HUD staff, telephone and in-person data collection will be manually recorded by UI or subcontractor staff members and consultants, who have received explicit training on the administration procedures for surveys and interviews to ensure accurate data collection and recordation with the least possible burden on respondents. The household survey will be paper and pencil interview [PAPI] administered. The limited use of technology for data collection purposes will reduce barriers to participation stemming from unreliable or lack of Internet, cell phone, or computer access in some remote tribal areas or concerns about confidentiality of electronic information. Respondents will receive advance materials to familiarize them with the general study and the specific data collection components they will be asked to address (see Appendix B). Both types of advance preparation are intended to facilitate smooth and efficient data collection with minimal burden for respondents.

The Tribe/TDHE telephone survey instrument will be modified by HUD for administration as a web-based survey to enable broader participation of Tribes/TDHE in this portion of the data collection.

A4. Efforts to identify duplication

As noted in the HUD solicitation RFQ R-CHI-01055 commissioning this study, the most comprehensive work on this topic was performed for HUD by the Urban Institute in 1996. The proposed study is intended to update the existing 1996 reports that separately assessed American Indian housing needs and programs, and Native Hawaiian housing needs. The earlier study collected information prior to the implementation of NAHASDA; a key aspect of this study is to reflect changes surrounding NAHASDA.

Secondary data sources only supply a subset of the indicators that a housing needs assessment requires. National surveys provide limited information about American Indians and Alaska Natives because of their relatively small numbers and dispersed population. To understand fully the housing needs in tribal areas, including residents' own perspectives on their housing challenges, the project requires primary data collection that will capture the experiences of residents, tribal housing program officials, and tribal leaders—from their points of view.

During the initial months of this project, UI conducted a review of the literature and received pertinent background information from HUD's Office of Native American Programs (ONAP). As far as we can determine, the current effort does not duplicate



existing information. Under NAHASDA, each grantee is required to submit an Annual Performance Report that includes indicators covering IHBG expenditures. Information from the Annual Performance reports is compiled by ONAP into the Performance Tracking System (PTD). Data are available at the grantee level and include grantee sources of funding, IHBG expenditures by activity, housing units assisted by type and activity, and households assisted by type and activity. ONAP has shared this database with UI and we have reviewed it carefully to ensure that data collection instruments will not repeat or duplicate that system.

A5. Methods to minimize the burden on small businesses or other small entities

There are no small businesses that will be asked to participate in this study; however, some tribal and community-based organizations and some lenders may constitute small entities. Several steps have been taken to minimize burden on such entities: 1) data collection is one-time only; 2) where possible, information will be collected from HUD administrative records and other secondary sources such as the Census; 3) data collection procedures involve opportunities to establish times for the interviews or survey administration that are most convenient for the respondents; 4) questions pertain only to essential information that cannot be obtained from secondary data sources; and 5) data collection instruments use fixed-choice response categories for items, where feasible, to minimize response time. Finally, the time required to complete interviews and surveys is brief, averaging no more than one hour. The data collection is, therefore, not considered to have a significant economic impact on such entities.

A6. Consequences if data are not collected

This will be the first comprehensive evaluation of Native American, Alaska Native, and Native Hawaiian housing needs since the passage of NAHASDA fundamentally altered the way federal funding for housing is delivered to tribal people. Failure to collect these data will result in insufficient information to satisfy the Congressional mandate to evaluate the housing conditions of native populations and the performance of the federal program in mitigating housing problems experienced by native peoples/communities. This information is critical to ongoing assessment of individual-level housing needs, and for identifying appropriate future measures that can be put in place to enhance housing conditions and opportunities.

A7. Special circumstances

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320.6 (Controlling Paperwork Burden on the Public—General Information



Collection Guidelines). There are no special circumstances that require deviation from these guidelines.

A8. Federal Register Notice and consultations with persons outside the agency

8a. Federal Register Notice

In accordance with 5 CFR 1308.8 (d) a *Notice* was published in the *Federal Register* on May 5, 2011 (page 25703) announcing the HUD Office of Policy Development and Research's intention to request OMB review of this data collection effort and soliciting public comments (Appendix C). Formal comments were received from Cook Inlet Housing Authority (Docket No. FR-5486-N-11) and XXX (Docket No. XXX). For the most part, comments sought clarification and additional information, which will be included in detailed responses provided by HUD (Appendix D). Some revisions were made to data collection instruments in response to comments (e.g., wording changes, additional response options. The instruments in Appendix A include these revisions.

8b. Consultations with Persons Outside the Agency

Consultations are an especially critical element of this study; they commenced during the project's early planning and will continue throughout the life of the project to ensure that tribal governments and communities are willing to collaborate with the planned study and data collection as identified here. In the last two decades, tribes, Native villages, and consortia have taken an increasingly active role in challenging, as well as generating, research and program evaluation. These entities seek opportunities to influence research agencies and to exercise the power to reject unwanted research on their lands and with their people. The emergence of research requirements by IRBs has supported the influence of tribes on research conducted in their communities. Tribes are concerned not only with informed consent and the need to present information in a participant's primary language, but also with promotion of collaborative, participatory research models.⁴ (Caldwell et al. 2005). Clearly, in addition to OMB approval, the approval of Tribal leadership will be a key factor in enabling the proposed study to achieve the stated objectives. Consultations to-date include: outreach sessions

⁴ Caldwell, J.Y., Davis, J.D., Du Bois, B., Echo-Hawk, H., Erickson, S., Goins, R.T., et al. (2005). *Culturally competent research with American Indians and Alaska Natives: Findings and recommendations of the First Symposium of the Work Group on American Indian Research and Program Evaluation Methodology*. American Indian and Alaska Native Mental Health Research: The Journal of the National Center.



convened by ONAP, informal discussions, with key stakeholders, and convening an Expert Panel.

From December 2010 through March 2011, ONAP convened seven regional outreach sessions with tribes to describe the upcoming study and obtain tribal input on survey data collection instruments and procedures and address tribal concerns in order to promote participation in the study. Continuing this consultation process, Dr. Raphael Bostic, Assistant Secretary of PD&R and Rodger Boyd, Deputy Assistant Secretary of ONAP, will answer questions and receive input from tribal leadership at two events co-sponsored by the National American Indian Housing Council (NAIHC) and the National Congress of American Indians (NCAI): a national teleconference on July 14, 2011 and a tribal leaders' meeting on July 27, 2011.

The UI team has also initiated informal telephone and in-person discussions with stakeholders who are familiar with existing data, with implementation of NAHSDA, and with tribal housing conditions and programs. In addition to officials within HUD, most particularly its Office of Native American Programs (ONAP), consultations with persons outside the agency have included discussions with representatives of key interest groups such as the National American Indian Housing Council (NAIHC) and the National Congress of American Indians. These discussions helped to shape the design of the evaluation, avoid duplication, and suggest approaches to reduce burden and encourage participation.

An Expert Panel—composed of individuals with deep knowledge of Native American circumstances in tribal areas and other locations, as well as policies and programs pertaining to Indian Country— was convened especially for this evaluation by the Urban Institute. The Expert Panel received draft copies of the research design and early drafts of data collection instruments, convened in Washington DC on April 27, 2011, and then received revised data collection instruments, providing comments via e-mail.



The Expert Panel consists of:

Laura R. Appelbaum, Ph. D.

Senior Research Analyst
School of Public Affairs
University of Colorado Denver
Denver, CO

Kauila Clark

Vice Chair
Waianae Health Center
Kapolei, HI

Marvin Jones

Manager of Housing Oversight
Cherokee Nation of Oklahoma
Tahlequah, OK

Miriam Jorgensen, Ph. D

Research Director
Harvard Project on American Indian Economic
Development and the Native Nations Institute,
University of Arizona
St. Louis, MO

Blake Y. Kazama, Ph. D.

Executive Director,
Tlingit-Haida Regional Housing Authority
Juneau, AK

Peter Morris

Director of Strategy and Partnerships
Policy Research Center of the National
Congress of American Indians (NCAI)
Washington, DC

Patricia Nie

Community Development Officer (New Mexico
and Wyoming)
Wells Fargo Bank
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A9. Remuneration to respondents

Respondents to the household surveys will receive \$20 incentives. Incentives have been shown to be effective in increasing overall response rates in all modes of surveys.⁵ During the ONAP outreach sessions, tribal representatives suggested that Wal-Mart gift cards or gas vouchers would be suitable incentives in lieu of cash. This will be re-confirmed with each tribe prior to conducting household surveys for specific communities.

Participants in discussions held as part of the urban case studies will also receive \$20 incentives, either in cash or a gift card plus a light meal or refreshments. The provision of an incentive will help with the recruitment of respondents to encourage them to participate in the discussion group. Further, some discussion group participants may incur direct costs (such as transportation) for attending the discussion group, and consequently might not be able to participate without remuneration.

A10. Assurances of confidentiality

Data collection and analysis for the Assessment of Native American, Alaska Native, and Native Hawaiian Housing Needs will be done by the Urban Institute and its subcontractors under contract HUD Contract C-CHI-01092/GS-23F-8198H. The Urban Institute maintains an Institutional Review Board (IRB) to ensure that research practices and procedures effectively protect the rights and welfare of human subjects, consistent with the requirements set forth in Title 45, Part 46 of the *Code of Federal Regulations* (45 *CFR* 46). The Institute's policy is that all research involving human subjects, not just research sponsored by federal government agencies that have adopted the Common Rule under 45 *CFR* 46, must adhere to the following principles, among others:

- Risks to human subjects from research must be reasonable in relation to anticipated benefits, and must be minimized to the extent possible;
- Human subjects must be fully and accurately informed of the nature of the research in which they will be involved, whether their participation is mandatory or voluntary, any consequences of non-participation, any risks associated with their participation, and how the research will be used;

⁵ Singer, Eleanor (2002). "The Use of Incentives to Reduce Nonresponse in Household Surveys." In *Survey Nonresponse*, eds. Robert M. Groves, Dan A. Dillmon, John L. Eltinge, and Roderick J.A. Little. p. 163-77.



- Adequate provision must be made to protect the privacy of human subjects and to maintain the confidentiality of data that are collected, where promised and as appropriate.

Prospective survey and interview respondents for the present data collection will be informed, through introductory communications and as part of the survey and interview processes, about the purpose of the data collection, its sponsorship, that participation is voluntary, and responses will be kept confidential. Accordingly, reports produced by the Urban Institute for HUD may name organizations that participated in the data collection effort, but will not link respondents with particular information collected.

Within the Urban Institute and its subcontractor organizations, information identifying particular respondents will only be shared with staff who have signed *Data Confidentiality Pledges* and who need the information for research purposes. All such staff, as well as consultants to the Urban Institute for the evaluation, will sign this pledge. Hard-copy materials containing respondent identifying information will be locked up when not in use, and electronic materials with identifying information will be stored on a secure server in password-protected and/or encrypted files, where appropriate.

Tribal IRBs may include additional requirements, such as obtaining signed written consent forms from participants. Such requirements will be determined by each participating tribe and approved by UI's IRB.

A11. Questions of a sensitive nature

The questions being asked of TDHEs, tribal housing officials, tribal leaders, community leaders, lenders, program operators and staff in urban areas, Hawaiian Homestead Association Directors, Department of Hawaiian Homelands representatives, or other stakeholders are not considered personally sensitive. They do not ask about sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. However, some of the entities to be interviewed, such as banks and credit unions, will be organizations that may consider some information about their operations to be proprietary. Respondents will be informed that participation is voluntary and that they can decline to answer any question—without consequence.

Household respondents and urban residents participating in discussion groups will be asked questions about their personal circumstances, such as family composition and household income. These questions are being reviewed by outside experts (see response to question A.8b) to minimize the sensitive nature of the questions (e.g., asking income in broad ranges) and will include reminders about our assurance of confidentiality. Our outreach to tribes will assure that approaches are tailored to concerns



about sensitive questions and confidentiality (for example, not hiring tribal interviewers who are employed by the housing agency). As noted above, all respondents will be informed that participation is voluntary and that they can decline to answer any question—without consequence.

A12. Estimates of the burden of the collection of information

12a. Estimate of respondent burden hours

The data collection activities will involve an in-person survey, in-person interviews and discussion groups, a telephone survey, a web-based survey, and telephone interviews. Members of the affected public include:

- Tribal heads of households: 1,280 in-person household surveys
- TDHE/tribal housing staff: 104 telephone surveys, 24 in-person interviews, plus an estimated additional 200 web-based/phone surveys
- Tribal leaders and program staff: 4 in-person interviews at 24 sites(96 interviews)
- Lenders, primarily Section 184 Program approved lenders, but also including tribe-owned credit unions, Native American CDFIs, and lenders using state Housing Finance Agency (HFA) initiatives: telephone interviews with 30 - 35 lenders
- Telephone interviews with Indian Community Center Directors, public housing authority staff or other housing service providers in urban areas: 35 telephone interviews.
- In-person interviews with Indian Community Center Directors, other Indian community center staff; housing agency, homeless shelter, and social service agency staff in 5 urban locations: in-person interviews: 5-6 interviews per site (total 25-30 in-person interviews)
- Native American residents in urban areas served by the agencies contacted for interviews: group discussions of 10-12 in 5 locations (50-60 participants)
- Leaders of Native Hawaiian Homestead Associations, managers and administrators in the Department of Hawaiian Homelands, and representatives of other stakeholder organizations for the study of Native Hawaiian housing: telephone interviews (about 100 interviews).



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The burden estimates for most instruments are based on pretests that took place from late August to mid-September 2011. The household survey was pretested in three tribal areas, with a total of six respondents. The TDHE/tribal officials survey was pretested in two tribal areas with a total of two respondents. Interview guides for lenders, Indian Community Center Directors, Directors of Hawaiian Homeland Associations, Department of Hawaiian Homelands staff, and representative of other Hawaiian stakeholder groups were pretested over the telephone. Due to time and budget constraints, the on-site interview guides for tribal leaders, tribal housing officials, TDHEs, and other community leaders were also tested over the telephone. We did not pretest the web-based survey since HUD staff will be administering that survey. Changes made to the tribal housing officials/TDHE telephone survey instrument as a result of the pretest will be incorporated into the web-based survey instrument. Burden estimates for the urban case study group discussions are based on prior experience with similar data collection instruments and respondents.



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Table 2: Estimation of the total number of hours needed to prepare the information collection including number of respondents, frequency of response, and hours of response

Instrument/ Respondents	Number of Respondents	Number responses per respondent	Average burden/ response (in hours)	Total burden hours
Household Survey: Tribal heads of households	1280	1	.85 hour (approx 50 min)	1088 hours
Telephone Survey: TDHE/tribal housing staff	104	1	.85 hour (approx 50 min)	88.4 hours
Tribal site visit In-person interviews: TDHE/tribal housing staff	24*	1	1 hour	24 hours
Web-based survey TDHE/tribal housing staff:	200	1	.5 hour	100 hours
Tribal site visit in-person interviews: Tribal leaders and program staff: (8 per site at 24 sites)	192	1	1 hour	192 hours
Telephone interviews: Lenders:	35	1	.75 hours	26.25 hours
Urban study telephone interviews: Indian Community Center Directors, selected PHA, and program staff	35	1	.5 hours	17.5 hours
Urban case study in-person interviews: Indian Community Center Directors; other Indian community center staff; housing agency, homeless shelter, and social service agency staff (5 per site in 5 sites)	25	1	1.5 hours	37.5 hours
Urban case study group discussions: Native American residents in urban areas: (10 per group in 5 locations)	50	1	2 hours	100 hours
Native Hawaiian association and agency managers and staff; other stakeholders: telephone interviews	100	1	.75 hours	75 hours
TOTAL	2,045			1,748.65

* Note: these respondents will also have participated in a Tribe/TDHE telephone interview.



12b. Total annual cost burden to respondents

Potential respondents for the online surveys and telephone interviews associated with this data collection range widely in position and earnings. The median hourly wages of selected occupations (classified by Standard Occupational Classification, SOC, codes) was compared using Occupational Employment Statistics from the U.S. Department of Labor’s Bureau of Labor Statistics. Potentially relevant occupations and their median hourly wages include:

Occupation	SOC Code	Median Hourly Wage Rate
Laborer	53-7062	11.28
Office clerk	43-9061	12.79
Loan Officer	13-2072	27.16
Social/community service manager	11-9151	29.98
Managers, all others	11-9199	46.37

Source: Occupational Employment Statistics, May 2010, accessed online June 30, 2011 at http://www.bls.gov/oes/current/oes_stru.htm

The first two occupations are used to estimate costs for household survey and discussion group participants. We use the average for these two occupations, or \$12.04 per hour. For all other respondents, we use an average of the last three occupations listed, or \$34.50.

Based on this assumption, the estimated total respondent costs are:

$$1188 \times \$ 12.04 = \$ 14,303.52$$

Plus

$$554.65 \times \$34.50 = \$19,135.43$$

$$= \text{Total Respondent Costs of } \$ 33,438.95$$

A13. Total annual cost burden to respondent or record keepers

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

A14. Estimate of annual cost to the government

The total cost for this study, including but not limited to the data collection activities described in this submission, is \$ \$3,964,303 over a 33-month period. Included are costs associated with background research, evaluation design, development of data collection instruments, data collection activities, analysis, and reporting.

A15. Reasons for any program changes or adjustments

This submission is a new request for approval; there is no change in burden.



A16. Plans for tabulation, analysis, and publication

Primary data collection will begin after OMB approval; assuming OMB approval is received by October 1, 2011, the household survey and other data collection will commence on or about October 21, 2011 and end October 2012. The draft Final Report is anticipated January 21, 2013, and the final version of that report will be submitted April 22, 2013. Post-report briefings and closeout activities will be concluded by September 16, 2013.

Analysis and reporting will combine data from many different sources of data, both primary and secondary. Sources and analytical approaches will vary depending on the questions addressed. The analysis plan components⁶ for each topic specify which variables will be used and how they will be used. The topics are:

- Demographic, Social and Economic Conditions
- Housing Conditions and Needs
- Housing Policies and Programs
- Native Hawaiian Conditions and Needs

Frequently, the research will begin with the development of a set of interim tables. We will then examine those tables to identify the relevant findings and, after that, decide on a much simpler set of final tables and exhibits that will best illustrate those findings in our reports. We summarize these plans by topic below.

Demographic, Social and Economic Conditions

This analysis relies on secondary data and will be structured by “standard geographic areas” which we define as tribal areas, surrounding counties, other metropolitan counties, and other nonmetropolitan counties by region. Our regional breakdown is a modified version of ONAP regions (the same as used in the 1996 study except that the Oklahoma and South Central regions are combined).

The analysis will include population growth and distribution. We will look at the population and migration trends, and changes in the tribal area boundary lines to learn about the recent growth and spatial distribution of American Indians. Unless otherwise noted, the data in this analysis will come from the 2000 and 2010 United States Decennial Censuses. We will look at household composition, employment, income, and other indicators for American Indians living in and out of tribal areas and compare them with the non-AIAN population. After our discussion and comparison of the social

⁶ A detailed analysis plan was submitted to HUD on July 1, 2011



conditions and economies of tribal areas and overall American Indian population, we will attempt to more rigorously classify tribal areas using a cluster analysis. This will help us understand the characteristics of tribal areas that are doing particularly well or poorly on various metrics and also encourage further academic research on tribal area conditions. We will also characterize the variations in the economies of Indian Country and examine the role of the gaming industry.

To achieve greater understanding of the social and economic circumstances of Indians living in urban areas, we will analyze relevant secondary data along with primary data for the 30 MSAs (25 selected for telephone interviews and 5 selected for the case studies) to be included in the urban study. Population numbers come from the 2010 Census; additional data comes from the 2009 one-year American Community Survey and is supported by primary data collected during telephone and in-person interviews and discussion groups.

Analyses will support examinations of the: concentration or dispersion of Indian households across an MSA (urban core or suburban residency); intra-MSA mobility rates; mobility between MSAs and reservations or tribal areas; social and economic circumstances; comparison of urban AIAN populations with all non-AIAN households and with other racial and ethnic groups; comparison of economic indicators for AIAN in different types of MSAs; comparison of economic indicators for AIAN in metro and non-metro areas. These data and data comparisons will lead to a broad-brush picture of the socioeconomic conditions and needs among AIAN households living in urban areas with the highest and the fastest growing AIAN population.

Findings from secondary data analysis will be discussed in an interim report and will support the two primary data collection efforts for the urban study. The final report will incorporate findings from primary and secondary data analysis and will include vignettes prepared from case study materials. We will produce maps that illustrate the current geographic distribution of Native American households both across the selected MSAs and between the selected MSAs and reservations or tribal areas. Maps also will show the changes in distribution since 1990. Additionally, we will draw on demographic data specific to the five case study sites to provide context on the neighborhoods within which Native American households cluster for those MSAs where clustering is found. These site data will be used to build a brief description of each study site in order to provide context for the interviews staff will conduct during site visits.

We will use qualitative data collected after the interim report to fill gaps and explore additional issues of interest at the MSA level beyond what will be possible with



secondary data, such as exploring why households decide to move to or from urban areas and why they reside in one part of an MSA rather than another area. The findings from the additional data collection and analysis will be included in the final report.

Housing Conditions and Needs

This section of analysis will take advantage of the household survey and enumerator observations of housing conditions. An overview will be drawn from the Decennial Census and ACS and provide context on the housing stock and selected housing problems for AIAN households. Then we will present a full analysis of housing problems and needs for AIAN tribal areas based on a nationally representative sample. The household survey data will be analyzed to produce a national total for tribal areas of percent of households with problems, and by standard category (affordability, overcrowding, and physical/system deficiencies), and for assisted units compared to other units. National totals for tribal areas will also be produced for satisfaction with current housing. The roster information collected in the household survey will provide data on household composition, years residing at the current address, and reasons for moving to the current address. These data combined with information on unit size will shed new light on the motivations behind current living arrangements and on notions of overcrowding and homelessness in tribal areas which might differ from how these terms are understood or experienced more broadly. For example, drawbacks of overcrowded housing might be balanced against the value of multiple generations living together. Within this topic area, special analyses will include:

- ***Homeownership and Mortgage Lending in Tribal Areas.*** Mortgage lending on Indian land still presents challenges that influence origination volume and geography. Moreover, the recent financial crisis created liquidity constraints in most mortgage markets – constraints that are likely having an impact on lending on Indian land as well. We will use data from the household survey to present national totals of the share of households in tribal areas reporting home ownership or lease-purchase arrangements; percent of renters saying they would prefer to be owners by reason, barriers to homeownership, types of mortgage assistance reported; and other key variables.
- ***Analysis of housing conditions, problems and needs of Native Americans living in urban areas.*** We will analyze MSA-specific data for the 30 urban study sites. We will use Census data to examine issues of housing affordability, overcrowding, presence of adequate kitchen and



plumbing facilities, and the year housing was built. We will also use data from interviews with key stakeholders in each of the 30 sites along with interview and discussion group data collected in the five case study sites. Data will be analyzed to determine whether and in what ways housing problems vary: by household income level; across MSAs; within MSAs (urban core compared with suburban areas); and based on proximity to reservations and tribal areas. Housing conditions and problems among AIAN households also will be compared with those among other minority groups. From the 5 case study visits, we will draw vignettes on topics such as the perceived impact of the recession on housing needs; challenges service providers face in meeting AIAN housing needs; conditions of available housing units; and addressing homelessness among AIAN living in urban areas.

Housing Policies and Programs

Analysis plans for this topic relate to the role that federal housing policies and programs have played in determining housing conditions for American Indians and Alaska Natives, and assessing the overall impact of NAHASDA. We will first provide a comprehensive description of the history of housing assistance in Indian Country before 1996 and then review the history and features of NAHASDA, changes in the level of IHBG funding provided over the years, using earlier reports and ONAP's Performance Tracking Database for the Years 2003-2010. The analysis will include Region, grant size, and population (growing, declining, no change). Using data from the Tribe/TDHE survey, we will review the types of organizations that have evolved in tribal areas to administer the IHBG, examining their characteristics, including their size and comparative stability.

Our analysis of the quantity and quality of assisted housing stock will review evidence as to the 'bottom line' for NAHASDA performance – focusing on changes in the number of households and units assisted and the quality of the housing that has been provided. It will examine perceptions (of residents and housing officials) as well as objective data on stock quantity and quality. Units of analysis will be region, grant size, and organization type. The ONAP Performance Tracking Database will provide information on the number and percent of units by program, and the proportion of units needing rehab. We will also analyze these data by region, grant size and organization type. Using this information and data on maintenance funding and age of housing stock, we will use regression analysis to assess whether the share needing rehab or replacement been influenced by changing funding for maintenance, age of the stock, and or other factors. This information will be supplemented by our on-site interviews.



Our analysis of how the IHBG is being administered in tribal areas will begin by tracking changes in the level and composition of IHBG expenditures since 2003 (highlighting shifts in key relationships such as shifts in shares spent on Formula Current Assisted Stock [FCAS] vs. new development). We will then look at variations in selected measures of performance (e.g., spend-down rate, frequency of inspections). Aspects of the local Indian housing program planning process will be considered next, followed by an examination of the degree to which IHBG administrators collaborate with other groups in their activities.

Our analysis will also identify and describe publicly funded non-IHBG housing and community development programs serving tribal people. We will attempt to discern the impact that these have had on housing conditions and describe the changes in how programs and other funding sources have served AIAN people since the 1996 study. Addition cross-cutting analysis will address:

- **IHBG Housing Development and Management Challenge and Solutions.** Our aim is to identify and analyze the nature of the challenges as well as describe innovative approaches tribes have developed to address these challenges. This cross-cutting analysis will draw from multiple sources of existing information as well as new data collection undertaken in this study. We will review literature on the legal, environmental, and cultural challenges to tribal housing development in order to provide context for data collection and assist in hypothesis development. We will incorporate surveys of tribal/TDHE officials; in-person interviews with tribal/TDHE officials, tribal leaders, other tribal housing officials, and community leaders; literature reviews; and interviews with experts, such as ONAP and National American Indian Housing Council (NAIHC) staff.
 - With respect to challenges faced in developing new housing, we will tabulate responses to the Tribe/TDHE survey pertaining to the most important factors reported as limiting respondents' ability to develop new housing on tribal lands and analysis by region, grant size and organization type. This information will be supplemented by the on-site interviews.
 - In analyzing challenges faced in operating and maintaining the stock of existing housing, we will again rely on the Tribe/TDHE Survey and on-site interviews. For example, we will analyze the



factors reported by IHBG administrators as most important in limiting their ability to operate and maintain their existing housing stock effectively (factors such poor original construction, criminal activity, tenant selection and rent payments, lack of trained staff) by region, grant size and organization type. We will also analyze survey responses about the durability and frequency of repair of the existing housing stock, the extent to which criminal activity is a housing management problem, and challenges related to tenant responsibility (e.g., re maintenance and timely rent payments). We will also draw on the site visits and in-person interviews to identify and describe innovative practices that have emerged under IHBG to facilitate effective management of existing housing in tribal areas.

- **Challenges Associated with Homeownership and Mortgage Lending Programs.** Information for this analysis will largely come from the lender survey. We will report on the frequency of survey responses to closed-ended questions asking about challenges to originating mortgages on Indian land and specific strategies used to overcome them, supplemented by answers to open-ended questions on challenges of originating mortgages on Indian land. Responses will be analyzed by type of lender (Section 184, Native American CDFI or Tribe-owned Credit Union). We will code and analyze answers to open-ended questions on the types of programs used by lenders to originate mortgages on Indian land and the reasons for using such programs; on the major benefits and opportunities of originating mortgages on Indian land; and on the effects of the mortgage crisis on mortgage lending on Indian land and the effect of the Section 184 Program and other affordable lending products on reducing these effects.
- **Leveraging and Strengthening the Private Market – Challenges and Solutions.** One possible benefit of a flexible block grant is the ability to increase total housing dollars through partnerships with other public and private institutions, so this metric is an important performance measure for assessing program success. Leveraging and strengthening the private market in tribal areas are key objectives of NAHASDA. Analysis will focus on the extent to which tribes are leveraging IHBG grant dollars and on steps that have been taken to expand private market activity in ways that will further tribal goals.



- **Overall Impact of NAHASDA.** Finally, we will provide an orderly summary of the findings of all topics in pertaining to changes in conditions since 1996. Findings will be reviewed in relation to each of NAHASDA's major goals and the section will then draw these findings together in an overall assessment.

Native Hawaiian Housing Conditions and Needs

As with the other study components, the analysis will cover both secondary (federal Census) and primary data obtained by the study team. Although the data analysis approach for the NH population will parallel that of the rest of the study there will some analytic differences based on the demographics of the NH population. Unlike the Native American and Alaska Native populations the NH population does not have a set of federally recognized reservations or villages that can serve as units of analysis. There are state-recognized "Hawaiian Homelands" in the state of Hawaii, and on these lands a proportion of the NH population resides on state-recognized "homesteads." However, the "homestead" residents represent a relatively small proportion of the NH population within the state. Most of the NH population lives in areas in general population census tracts.

The same consideration applies to the NH population resident on the mainland. Data on this population will be available only when the size of this self-identified population is large enough to appear in standard Census classifications.

Based on these considerations the geographic units of analysis to assess the housing needs of the Native Hawaiians will be as follows:

- Analysis of the housing needs of the NH population currently resident on Hawaiian Homelands. Although this population is relatively small it has programmatic importance because it is the one segment of the NH population that receives housing assistance support comparable to that received by Native American and Alaska Native populations through NAHASDA;
- Analysis of the housing needs of the self-identified NH population currently resident in the state of Hawaii. This will include an attempt to compare need across the sub-regions of the state of Hawaii and between the general NH population and that resident on homelands;



- A limited overview of the housing situation of the NH population resident on the mainland. Data on this population will be compared to data on the NH population in the state of Hawaii as well as data on Native American and Alaska Native populations residing in urban areas.

With this in mind, we will analyze 2000 and 2010 decennial Census data to develop a demographic portrait of the Native Hawaiian (NH) population. National data (including mainland and state of Hawaii NH population figures) will be compared against two baselines: the figure for the total U.S. population and the national figure for the AIAN population. State of Hawaii NH population data will also be compared against the baseline of the total population of the state of Hawaii. In addition there will be a comparison of NH population data among the various sub-regions within the state of Hawaii. These sub-regions are: Island of Hawaii, Island of Hawaii West District, Island of Hawaii East District, Island of Kaua'i, Island of Lana'i, Island of Maui, Island of Moloka'i, Island of Ni'ihau, Island of Oahu, Oahu Central District, Honolulu District, Leeward District, Windward District. Also, for some selected variables there will be a comparison of characteristics of the mainland NH population with that of the total NH population of the state of Hawaii. The analyses that will be conducted will address: population growth and distribution; social and economic conditions and trends; and housing stock.

Analysis of survey data will be supplemented by available studies conducted by Hawaiian state agencies and research organizations to analyze: the extent to which the housing stock meets standards of adequacy. The study team will also obtain available administrative data from the DHHL. This information, along with the interview data, will be used to analyze: affordability; access to mortgages and other forms of lending for home purchases and/or improvements; level of overcrowding in NH housing units in the state of Hawaii; and possible indications of homelessness in the NH population and/or a lack of affordable housing for that population.

With respect to organizational/institutional challenges, we will analyze survey responses and administrative data to understand whether the provisions of the current Hawaii Housing Block Grant Legislation limits the ability of homelands residents and DHHL to financially leverage the resources inherent on the homelands and whether there any artificial and/or cultural barriers that limit the ability of residents and state-based organizations to improve the quality of housing available to the NH population.



A17. Approval to not display the OMB expiration date

Not Applicable. HUD plans to display the expiration date for OMB approval of the information collection on all instruments and correspondence with prospective respondents.

A18. Exception to the certification statement

This submission, describing data collection, requests no exceptions to the Certificate for Paperwork Reduction Act (5 CFR 1320.9).