



July 5, 2011

Reports Liaison Officer,  
Office of Policy Development and Research,  
Department of Housing and Urban Development  
451 Seventh Street, SW., Room 8230  
Washington, DC 20410

**Reference: Notice of Proposed Information Collection for Public Comment on the Assessment of Native American, Alaska Native and Native Hawaiian Housing Needs [Docket No. FR-5486-N-11]**

Dear Sir or Madam:

I write today on behalf of Cook Inlet Housing Authority (CIHA) to submit comment on the above referenced notice issued by the Department of Housing and Urban Development (HUD). HUD is soliciting public comment regarding its proposed Assessment of Native American, Alaska Native and Native Hawaiian Housing Needs ("Housing Needs Study"), in order to:

1. Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including if the information will have practical utility;
2. Evaluate the accuracy of the agency's estimate of the burden of proposed collection of information;
3. Enhance the quality, utility, and clarity of the information to be collected; and
4. Minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

CIHA appreciates HUD's efforts to solicit and review the input of tribes and Tribally-Designated Housing Entities (TDHEs) regarding the data collection instruments for the Housing Needs Study. According to HUD, the Study will be used to provide critical perspective of the need for safe, affordable housing for Alaska Native and American Indian families across the U.S. It is with great respect that CIHA provides the following comments in response to HUD's request for information.

### **Household Survey**

- The Survey Process. It appears that the in-person household survey will be preceded by a letter sent to each household where an in-person interview will occur. An interviewer will then go to the home and follow the script on the three-page household screener. It appears the interviewer will then either commence the survey or, if it is more convenient for the household, arrange a date and time to complete the in-person household survey. Comments on the process:
  - It may be more convenient to households if the three-page household screener instrument is conducted by telephone in advance. This way, the interviewer could

coordinate an appropriate place and time for the in-person household survey before showing up on the front porch.

- It would likely be helpful if a copy of the questions is sent to each household prior to the interview.
  - It may be helpful to provide an estimated amount of time the interview will take. This will help the respondent understand the time commitment.
  - The interviewer should explain the manner in which the survey will NOT be used, either in the written materials sent to the household in advance or during the process of completing the household screener. Households will be hesitant to provide accurate information about their housing conditions if they believe the information may be reported back to the tribe or to child service or social service agencies.
- Household Screener, Sections S1c and S1f (Pages 2-3) – Tribal Affiliation. It is unclear why HUD is gathering information on tribal affiliation. As it traveled the country presenting information on the Housing Needs Study, HUD repeatedly reassured tribes and TDHEs that the Study is intended only to examine the need for housing in Indian Country at a national level, not to describe housing needs on a regional basis or to influence the upcoming formula negotiated rulemaking process. However, the current Indian Housing Block Grant (IHBG) formula only considers data gathered through the U.S. Census and is not dependent in any way on tribal affiliation data. It therefore makes no sense for HUD to use the Housing Needs Study process to gather data on tribal affiliation unless HUD intends to use that information either to influence the IHBG formula through negotiated rulemaking or to distinguish the housing needs in various regions of the country or among various tribes. References to tribal affiliation should therefore be removed throughout the survey tools and the questions should be reframed to mirror the U.S. Census, which depends upon self-identification, rather than tribal affiliation, to determine Native American and Alaska Native status.
  - Part A, Household Composition:
    - Sections A4c and A5c (Pages 7-9) – Characteristics of Children. The amount of information the interviewer will gather regarding the characteristics of children in the household may raise suspicion. Households will be hesitant to provide too much information about children, and the interviewer's request for so much information about children may cause respondents to disengage unless the respondent explains why that specific information is important.
    - Previous Participation in Subsidized Housing Program. When trying to study housing needs in Indian Areas, it may be helpful to understand how many interviewees have participated in a subsidized housing program. There does not seem to be a section in the survey instrument in which this inquiry would fit seamlessly, but Part A on Household Composition is one option. The question could gather information on how many of the household residents have ever participated in a housing program, whether operated by a tribe, tribal organization, non-profit, or government entity, that made rent affordable, helped pay utilities, or provided other housing assistance.
  - Part B, Housing Unit Characteristics and Conditions:
    - Section B21 (page 16) – Heating Fuel. One of the response options is "kerosene or other liquid fuel." In Alaska, diesel fuel and heating oil are exceedingly common

liquid fuels in rural areas. For purposes of clarification, the response option should read, “kerosene, heating oil, diesel fuel, or other liquid fuel.”

- Part D, Culturally Responsive Housing:
  - Section D4 (page 24) – Choice of Housing. The question, as presently written, gathers little data. Almost all respondents would choose homeownership as the model they most desire. The question should be rewritten to gather information on preferred housing styles and exclude as a variable renting vs. homeownership. Also, consider a box for “other” that would allow respondent to describe another preferred style of housing.
- Part H, Attitudes toward Tribally-Assisted Housing:
  - Section H2 (page 31) – Maintenance Performance of Tribes and TDHEs. This question asks whether a “tribal housing authority” does “its share” of keeping a unit in good condition. Under some programs, such as Mutual Help, it is the responsibility of the resident, not the tribal housing entity, to maintain the unit. However, this will not stop some of the participants in such programs from responding that the tribal housing entity should do more to maintain the unit, even though it is the intent of the program to help residents develop self-sufficiency as they transition to homeownership. Thus, this question does not provide an accurate indication of whether the tribe or TDHE is actually doing “its share” of the maintenance. Rather, it measures whether the resident wants the tribal housing entity to do more, regardless of whether the resident or the tribal housing entity is responsible for maintenance under a particular program. Because the question does not distinguish between rental programs, homeownership programs, and other programs (like Mutual Help), it does not provide very good data.
- Part I, Household Income and Housing Costs:
  - Homeownership. Even though this section deals with housing costs, it does not attempt to measure how much homeowners spend on the costs of maintenance, repairs, insurance, and other costs of owning a home. More importantly, this section does not gauge whether those individuals who own their homes and thus are responsible for such costs have sufficient income to cover the “all-in” costs of homeownership. How much on average do homeowners spend on the foregoing costs each month or year? What percent of their income is committed to their housing when such costs are combined with debt payments? Are they doing repairs and maintenance themselves or paying for it? Do they receive assistance from a tribe or housing organization?
  - Transition to Conclusion of Interview. It should be noted that the instrument leaps from gathering sensitive information about household income and expenses into the conclusion. The first sentence in the document titled *Concluding the Interview* is, “I will be sending this document to our offices in Chicago.” Some may believe it is odd to gather sensitive income information, then immediately indicate that the document will be sent to mysterious offices in Chicago. This transition probably should be softened.

### **Tribal/TDHE Telephone Survey**

- Part A, Tribal/TDHE Organization and Institutional Relationships:

- Section A8 (page 4) – Partnering. The use of the term “partner” is confusing. In this context, what type of relationship does the term imply? Funder/grantee? Co-providers of the same program? Referrals? Would be helpful to know how “partner” is defined or exactly what this question is looking for in the way of a response. Also, there is no opportunity to explain partnerships with non-public entities, such as non-profit organizations.
- Part B, Staff, Training and Procedures:
  - Section B8 (page 7) – Priorities. The question asks, “What do you see as the highest priorities for improving the effectiveness of your organization?” Optional responses include more and better staff training, computer systems, and increased staff size. The question should include as an optional response, “Increased access to funding resources.”
- Section D, Tribal/TDHE Perceptions of Resident Housing Satisfaction and Preferences:
  - Section D1 (page 8) – Housing Satisfaction by Program. Correct “CFAS” to read “FCAS.”
  - Section D1 (page 8) – Housing Satisfaction by Program. This question vastly oversimplifies the number and types of programs available in many service areas. Tribes and TDHEs may be accessing programs such as the LIHTC, HOME, 202, 811, Section 8, USDA RD programs, state grant programs, and many others. CIHA, for example, will soon complete a development that will include NAHASDA IHBG funds, state grant funds, soft debt from a state housing finance agency, and even Public Housing Section 8 Project-Based Vouchers.
- Section E, Tribal/TDHE Perceptions of Housing Problems and Needs:
  - Section E4a (page 10) – Waitlists. While each tribe/TDHE maintains waitlists, it is unlikely that the person being interviewed will be able to provide figures from each waitlist memory. Other questions throughout the instrument likewise call for information that may need to be gathered before the respondent can report it. HUD should provide an easy way for respondents to follow-up with such information. Email would be preferable.
- Section F, Approach to Strategy in IHBG Planning and Implementation:
  - Generally, this section is outdated. Since the last Needs Study in 1996, many tribes and TDHEs have become experts at leveraging NAHASDA to secure other funding. Though NAHASDA funding remains critical as the “first in” funding source, it is not the sole driving factor in planning and implementation of housing strategies. Today, developments and programs often include funding from a substantial number of other housing programs, and while the IHP process is an important component of that planning and implementation process for a given development or program, it is not necessarily controlling. Hence, tribes and TDHEs that have developed leveraging capacity have often adapted their planning and implementation processes to include, but not revolve entirely around, the IHP process for the Indian Housing Block Grant program. This section requires further consideration in light of the overstated importance of the IHP as a plan for all housing activities, rather than simply as a plan for the expenditure of IHBG funds.

- Section G, Challenges in Housing Development and Operation:
  - Sections G3 and G4 (page 17) – Barriers. These two questions ask about barriers to construction and development. Both questions should include an additional response box, “other”. Many Alaskan entities must ship materials to sites by air or water. Shipments by air are limited by the weather, which is unpredictable. Shipments by water are only possible part of the year.
- Section H, Assessment of Rules and Procedures under NAHASDA:
  - Section H6 (page 20) – IHBG Rules and Practices. There does not seem to be a logical reason to limit respondents answering this question to those who are familiar with pre-NAHASDA Indian housing programs. Even those unfamiliar with Indian housing pre-NAHASDA can provide thoughtful suggestions regarding how IHBG rules and practices could be changed. However, if the purpose of the Study is to provide a national-level overview of housing needs, it is unclear why there is an entire section dealing with NAHASDA rules and procedures. The questions presented in section H do not tie back directly to the need for housing among Alaska Native and American Indian persons.

### **In- Person Interview Guides**

- Selection of Interviewees. Specifically how will interviewees be selected? It will be important to interview both representatives of small tribes/TDHEs and larger tribes and TDHEs that operate a variety of programs.
- References to Reservations. Throughout the survey instrument, there are questions requesting information on issues related to those who live “on or off the reservation.” However, Alaska has only one small reservation. Alaska Natives live in communities, large and small, throughout the state. The most active providers of Indian Housing are organizations that operate regionally, covering many communities and, collectively, most areas of the state.

### **Lender Telephone Interview Guide**

- Focus on Section 184 Program Participation. It appears from the instrument that only lenders with substantial Section 184 program experience will be selected. This would not provide comprehensive data. Many other organizations have experience lending in Native American communities and to Native American households. Lenders should also be considered if they have experience working with Title VI or are involved in LIHTC transactions, a primary development funding source for many housing units built for Native American families.

### **Native CDFI and Tribe-owned Credit Union Telephone Interview Guide**

- Importance of Native CDFI Input. In recent years, Native Community Development Financial Institutions have emerged as a primary funder for housing in many Native American communities. It is critical that the Study include input from leaders in this emerging area.

**Study of Native Americans Living in Urban Areas**

- Importance of Understanding Housing Needs in Urban Areas. In many parts of the country, American Indian and Alaska Native families with the greatest needs do not live on reservations or tribal lands or in villages. In Alaska, for example, a substantial proportion of the American Indian and Alaska Native population lives in urban centers, including Anchorage and Fairbanks. These individuals are no less American Indian or Alaska Native for living in cities or off of traditional lands, and programs like the Indian Housing Block Grant are intended to serve them equally. The information gathered in this section of the Study will be critical to help promote equal housing opportunities for all Alaska Native and American Indian people.
- It should be noted that throughout the Study of Native Americans Living in Urban Areas, the instruments reference reservations and tribal lands. These terms do not usually apply in Alaska. More often, interviewees will identify with the term "village" instead of "reservation" or "tribal lands." It may be beneficial to modify the instrument for use in Alaska.

On behalf of Cook Inlet Housing Authority, I value and appreciate the opportunity to submit comment to HUD on the above referenced notice. The instruments proposed by HUD will provide a comprehensive overview of the need for housing experienced by American Indian and Alaska Native peoples throughout the U.S. Once the data has been gathered and reports generated, however, it will remain important that the data be used for the purpose which have been stated during HUD's outreach process – to provide a national-level overview of Native American housing needs. To use the resulting data for other purposes, such as to influence the NAHASDA IHBG formula, would require the instruments to be significantly revised.

Respectfully submitted,



Carol Gore  
President/CEO