

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

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.



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.



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 has adapted the tribal/TDHE telephone survey for the web. This web-based survey will be administered by HUD staff. Since the instrument, respondents, and use of the data collected are integrally related to the work being conducted by UI and its subcontractors, HUD is seeking approval for the web-based data collection as part of this supporting statement.



- **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.

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.



**ASSESSMENT OF NATIVE AMERICAN, ALASKA NATIVE, AND NATIVE HAWAIIAN HOUSING NEEDS
PAPERWORK REDUCTION ACT SUBMISSION
JULY 14, 2011**

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	
Indian Housing Block Grant (IHBG) Formula Issues										



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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		
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			X		
Demography, Geography, Economy										
Population growth since 1996 study			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					



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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		
Appropriate standards for housing needs and problems	X	X	X		X			X	X	
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 has been 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 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

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.



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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

Peter Morris

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

Kauila Clark

Vice Chair
Waianae Health Center
Kapolei, HI

Patricia Nie

Community Development Officer (New Mexico
and Wyoming)
Wells Fargo Bank
Albuquerque, NM

Marvin Jones

Manager of Housing Oversight
Cherokee Nation of Oklahoma
Tahlequah, OK

Deana K. O'Hara

Senior Advisor to the Deputy Assistant
Secretary
Office of Native American Programs, HUD
Washington, DC

Miriam Jorgensen, Ph. D

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

Don Shircel

Director, Family Services
Tanana Chiefs Conference, Inc.
Fairbanks, AK

Blake Y. Kazama, Ph. D.

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



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,

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.



any consequences of non-participation, any risks associated with their participation, and how the research will be used;

- 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)



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- 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).

The times estimated in Table 2 are preliminary and are based on previous studies conducted by the Urban Institute using these methods as well as NORC's extensive household and telephone survey experience. A pretest of each of the data collection instruments will be conducted beginning in late July 2011 and results will be included in the second draft of this Supporting Statement.



**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	.75 hour	960 hours
Telephone Survey: TDHE/tribal housing staff	104	1	.75 hour	60 hours
Tribal site visit In-person interviews: TDHE/tribal housing staff	24*	1	1 hour	24 hours
Web-based survey TDHE/tribal housing staff:	449	1	.5 hour	224.5 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			1,592.25

* 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:

$$\begin{aligned}
 &1060 \times \$ 12.04 = \$ 12,762.40 \\
 &\text{Plus} \\
 &532.25 \times \$34.50 = \$18,362.63 \\
 &= \text{Total Respondent Costs of } \$31,125.03
 \end{aligned}$$

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 up 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 break down 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).

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



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 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 be 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;



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- 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).



B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

B1. Respondent Universe, Sample Selection and Expected Response Rates

1a. Respondent Universe

Three data collection efforts employing statistical methods are being conducted. The respondent universe for each is as follows:

- A major ***in-person household survey*** designed to provide national estimates of housing needs and conditions for Native Americans living in tribal areas. Household interviews will be conducted in 40 sampled AIAN tribal areas (target to complete observations and interviews in 1,280 housing units). According to the 2010 Census, there are 617 tribal areas and 967,135 individuals who list Native American only as their race.
- A ***survey of Tribal Housing Offices and Tribally Designated Housing Entities*** (called the *Tribe/TDHE survey*). These are the organizations that administer the Indian Housing Block Grant program under NAHASDA. We will survey a target of 104 of these organizations in the national sample of tribal areas.
- More in-depth ***in-person interviews with Tribes/TDHEs, tribal leaders, housing officials, and community leaders*** in 24 of the 40 tribal areas selected for the household survey.

1b. Sample Selection

Sites that will be the subjects of the efforts listed above in section B.1a have been selected via an integrated probability sample design to produce reliable national estimates. In brief, the design calls for proportional stratification by region and size (AIAN population). Within each region, tribal areas were selected with probability proportionate to size. We selected a sample of 120 tribal areas in this manner. The sample was selected from the universe of AIAN tribal areas as identified and defined by the U.S. Bureau of the Census as of 2010, consistent with applicable law. There is not a one-to-one correlation between tribal areas as defined by the Census and NAHASDA grantees because a few tribes choose not to participate or do not qualify. Also some TDHEs serve as “umbrella” organizations, and represent more than one tribe. However, we sampled based on Census tribal areas because this is the most clearly defined frame and the primary purpose of this study is to assess housing needs and conditions of Native Americans living in tribal areas.



Of the 120 tribal areas selected, 40 (with 20 back-ups) will be targeted for administration of the household survey. Then, 24 of the 40 will be selected for visits by the teams that will conduct the in-person interviews with officials (purposive sample, designed to assure that an appropriate variety of conditions will be observed). All 120 will be contacted for the administration of the Tribe/TDHE survey by telephone, with the expectation that 104 will result in complete interviews.

While we will fix the number of sites for the household survey at 40, the survey subcontractor's⁷ extensive data collection experience in Indian Country suggests that we need to be concerned about levels of non-participation at the tribal level—regardless of the efforts we intend to make to encourage participation. Such instances can arise from limited tribal capacity to host researchers, inability to identify tribal partners to help collect data, tribal events that are incompatible with the data-collection schedule, or considerable difficulties gaining approval from tribal IRBs. Through our experience on other projects in tribal areas, we are very aware that there are wide disparities in the qualifications and capabilities of tribal administrative personnel. Also, administrative personnel at smaller tribes often have multiple responsibilities and, thus, a limited amount of time to respond to information requests.

For this reason, we oversampled tribal areas. Our approach to oversampling balances the need to maintain control over sample size with the importance of avoiding convenience sampling—which we believe undermines the credibility of survey results. This is critical because, left uncontrolled, the sample size (number of interviews) could swing by a sizeable number, depending on the number of reluctant tribal sites that cannot be encouraged to participate—representing a large risk to the government investment in this survey.

Accordingly, in addition to the basic 40 site sample, we also selected a reserve sample of 20 sites that can replace non-participating sites from the original group. The 40 sites and 20 alternate sites will be contacted at the start of the survey effort and informed of their status. As described below (section B.2), pre-data collection planning will be initiated with both groups; however we will be very clear that intensive efforts will be made to obtain the participation of the 40 sites before replacing any of them with a reserve site. (This is a very important point because

⁷ NORC at the University of Chicago



selecting the first 40 that agree to participate among the 60, without regard to sample or reserve status, would amount to convenience sampling).

Within each region, we implicitly stratified by size of tribal area, excluding tribal areas with fewer than 150 AIAN persons. We excluded the very small sites because they account for such a small share of the overall AIAN population living on tribal land; we want to ensure that our 40-site clusters provide as much coverage and diversity as possible; and we want to restrict ourselves to sites that can yield the desired number of interviews. Based on data from the 2010 Census, this sampling strategy covers over 98 percent of the AIAN population in tribal areas. In Alaska, the strategy covers 91 percent of the population because of the preponderance of small tribal villages in Alaska; however, this should not have a substantial negative effect on our estimates as the sampling procedure is intended to obtain national estimates rather than estimates for Alaska Natives alone.

Size was determined using Census 2010 counts of American Indians and Alaska Natives. The tribal areas sampled for the survey are spread throughout the distribution of size for each region, with larger areas having a higher probability of inclusion into the sample. The resulting national estimates will reflect the housing conditions of the average person or household rather than the average tribal area.

For the household survey, we will sample 1,600 households/addresses and attempt to complete 1,280 interviews across the 40 tribes (yielding an average of 32 AIAN respondents in each tribal area). Our sample is designed to produce national estimates of AIAN households residing in tribal areas.

One complication is that the four largest tribal areas (Navajo, Cherokee, Creek, and Lumbee) are quite large: based on the 2010 census, they accounted for 40 percent of the total AIAN persons in tribal areas with over 150 AIAN persons. Allocation of the sample strictly in proportion to population would lead to interviewing 40 percent of the sample in these four areas. We believe such heavy interviewing in these four areas is neither feasible nor a good use of resources. Instead, we propose to interview 2.25 times as many persons in three of these large areas (Cherokee, Creek, and Lumbee) as are interviewed in other areas and then weight any national estimates to account for this disproportionately low sampling rate. This weighting will reduce the precision of any national estimates, but this is unavoidable as it would be inappropriate to exclude the largest tribes from the survey. Further increasing the number of interviews in these large areas would improve the precision of our national estimates.



This is a particular concern with respect to the Navajo tribal area, which is by far the largest tribal area, accounting for 17.5 percent of the AIAN population in the tribal areas covered by our study. Therefore, we have arrived at a strategy that is conditional on Navajo participation. To gain participation of the Navajo Nation, we will begin our outreach efforts early and comply with their required IRB approval process. If Navajo Nation agrees to participate, we will double the number of interviews conducted there relative to other certainty areas, slightly reducing the number of interviews in each of the non-certainty sites. If surveys cannot be conducted there, we would add an additional non-certainty site – and increase the number of interviews in each of the non-certainty sites. The results would then reflect AIAN housing in non-Navajo tribal areas.

Assuming Navajo participation, we plan to complete 125 interviews in the Navajo tribal area; 61 interviews in the other three certainty areas; and 27 interviews in the 36 non-certainty sites. The Navajo area would account for 9.7 percent of the sample as compared with its 17.5 percent population share. The three remaining certainty sites would have 4.7 percent of the sample as compared with their 6.7, 6.7 and 9.4 percent shares of the population. The non-certainty areas would account for 76 percent of the sample as compared with its 60 percent share of the population.⁸

Table 3 summarizes the respondent universe and the sample size for each data collection component that involves sampling.

⁸ The analyses based on the household survey will be weighted to offset the under-representation of the population in the largest tribes in our sample. As noted in the text, the largest four tribes represent roughly 40 percent of the population, but only 24 percent of the sample. To adjust for this, we will develop a weight based on population and sample shares that ensures that the households from each of the certainty areas are given their full population share. In addition, we anticipate some weighting to adjust for non-response, especially that resulting when sampled sites are replaced.



Table 3: Respondent Universe and Sample Size

	Description of Respondent Universe	Universe Size	Sample Size	Sampling Method
Household Survey	Individuals reporting AIAN as their only race and residing in a tribal area	4,801,033 in 402 tribal areas*	1,600 in 40 tribal areas	PPS
Tribe/TDHE Survey	NAHASDA Grantees	402 tribal areas	120	PPS
Tribal Site Visits	Tribal Areas	402 tribal areas	24	Purposive

* non-Hawaiian tribal areas with population 150 or greater

1c. Expected Response Rates

Anticipated response rates for these three data collection efforts are as follows: 80 percent for the household survey; 87 percent for the Tribe/TDHE survey, and 90 percent for the site visits.

We anticipate that the greatest challenge will be obtaining approval from each tribe to conduct the study. The 1996 survey attempted to include 36 tribal sites, with a sample size of 20 households per site. However, only 24 sites completed the household survey. In the 24 sites that did complete the household survey, individual household participation was high, indicating that once a tribe agreed to be part of the study and engaged with researchers to promote the study, individual survey response rates were high. Consequently, we plan an intensive outreach effort to achieve a high participation rate in the household survey. The sample design, along with an increase of sample sites with interviews and an increase in sample size to 1,280 households, will yield reasonably reliable national measures of housing need and conditions such as overcrowding, homelessness, adequacy of infrastructure (e.g., sanitation, electricity), types of financing available and used, and rent burden/cost—as well as information on factors likely to be associated with variations in these measures.

For the Tribe/TDHE survey, we expect high participation among tribes that have agreed to participate in the study. This is an opportunity for NAHASDA grantees to share their successes as well as their challenges and offer recommendations for improving operations



under NAHASDA. We expect the survey to yield reliable estimates of housing conditions and needs, key challenges, and sources of funding leveraged.

The expected 90 percent site visit data collection is based upon past experience and our plan to implement an integrated approach to the collection of data for the 40 tribes selected for the household survey and the 24 of those tribes that also have a site visit involving in-person interviews. This will provide ample time for establishing a rapport with the site and identifying a time that is convenient for the tribe and identified respondents.

B2. Procedures for the Collection of Information

This section describes procedures for: 1) the household survey; 2) the Tribe/TDHE survey; and 3) the site visits.

Household Survey

For the household survey we have detailed procedures for: a) creating the sample frame; b) site replacement; and c) survey administration. H

Sample Frame

Having selected tribal areas for the household survey, we must create the household sample frame for each tribal area. Our experience with data collection in Indian Country suggests that obtaining lists of AIAN households and their addresses on tribal lands will be challenging. We plan to use the following sources/methods for constructing the list of households/addresses that will be the universe from which the sample to be targeted for interviews will be selected:

1. *United States Postal Service (USPS) address lists.* NORC (the survey subcontractor) maintains a database containing USPS address lists for the entire country. Only city-style addresses are suitable for a sampling frame, however, so NORC's database cannot serve as the sampling frame for all tribal areas. In particular, post office box addresses and other rural route addresses do not provide a physical location for data collection. Where analysis suggests our database of USPS addresses will account for at least 80 percent of all households in a tribal area, this is our preferred method of data collection since the coverage of the tribal area is high and the cost is minimized. However, we anticipate that many households in Indian Country may not have a



registered address and might use post office boxes that would not be usable for sampling.

2. *Tribal Membership Lists.* A second option is to use tribal membership lists for sampling rather than a strict address-based sample. Many tribes maintain a regularly updated list of all households that are members of their tribe and reside within tribal area boundaries. Where such a list is maintained to high standards, is computer-based, and contains addresses, it can be the basis for sample selection. The list may be provided through highly secure means to the designated members of the research team or the tribe may draw the sample following procedures established by the research team, as described below:
 - a. *Tribal Membership Lists used by the research team.* If a tribal list is available, is deemed to be of high-quality to ensure AI/AN coverage, and the tribe is willing to share a de-identified list with the study team, we will use this list as the sampling frame and proceed with random sampling of households.
 - b. *Tribal Membership Lists with Tribal Sampling.* In some cases, tribal lists may be maintained to high standards and be good source for sampling, but the tribe may not wish to share the list with outside researchers. In these cases, we will work with the tribe to identify a skilled and trusted tribal member who can draw the sample for us following procedures specified by the project team.
3. *Listing.* For areas where USPS coverage is insufficient; tribal lists are outdated, incomplete, or otherwise inadequate for sampling; or tribes do not wish to provide the list or draw the sample for the research team, a listing process will be undertaken.
 - a. *Full Listing.* A full listing process involves field researchers visiting the sites ahead of time and, with a survey methodologist, constructing a list of every housing unit in selected census blocks. This requires an additional visit to the tribal area as well as the time spent listing the housing units, so it is the most costly option, and will be undertaken in a limited number of sites (up to eight) which are not amenable to other alternatives.
 - b. *List-and-Go.* The list-and-go method is a listing alternative where a trained field interviewer, supervised by a field manager, screens for interviewing eligibility at



every k^{th} housing unit listed, where k is determined in advance by the research team. List-and-go can be accomplished on the same trip as household interviewing.

One disadvantage of the USPS address lists, full listing, and list-and-go is that non-AIAN households who live in tribal areas are likely to be selected as a part of the sample. Where these approaches are used, it will be necessary to oversample and then ask identifying questions at the beginning of all interview visits so non-AIAN households can be screened-out expeditiously. An advantage of the tribal membership list approach is that it eliminates the need for any screening of selected households.

Now that the sample of sites has been selected, 40 sites plus 20 alternates, we are undertaking a pre-outreach reconnaissance process. We are assembling readily available information about each of the 60 sites. For example, we are obtaining information from various sources on the quality of each tribe's membership list and on whether a USPS list is available (and if so, calculating how big a share listed addresses represent of total households). We are also finding out which of these tribes has an IRB process and about other characteristics that could influence how we might best approach them during outreach.

We will use this information to make a tentative selection of which of the alternatives described above appears to be the best for creating the household sampling frame at each of the 40 sites in the base sample. Our approach is informed by use of the decision tree that is presented in Exhibit 1 and described below.

- If a USPS list is available for the tribal area and provides an acceptable level of coverage, then this list will be used for the sample frame and sampling will be conducted by the survey subcontractor.
- If a tribal list is available, then we will ask if the tribe is willing to share a de-identified list with the study team. If yes, we must also ask if the tribal IRB or regulatory body approves of sharing this list. If this list is deemed to be of high-quality to ensure AIAN coverage, then we will use this list as the sampling frame and proceed with random sampling of households.
- If the tribal list is of high quality but the tribe does not wish to share it with the research team, we will work with the tribe to identify a skilled and trusted tribal



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member who can draw the sample for us following procedures specified by the project team.

- In cases where USPS lists are not adequate and a tribe elects to not share a membership list, and the tribe is unwilling or unable to work with the research team to conduct the sampling using the tribal list, then we will ask if the tribe will allow the site to be listed. If yes, then we will proceed with either full listing or list-and-go, as described above. If not, then we will renegotiate with the tribe to seek cooperation. If this effort is unsuccessful and there is no other alternative to developing the sampling frame, then we will have to replace the site with one of the replacement sites within the designated region.



Exhibit 1. Decision tree for development of the household sampling frame

Is an address-based list of tribal members available?							
YES				NO			
What is the source of the list?							
USPS list		Tribal lists					
Can the list be used for sample selection (over 80 percent coverage of households in tribal area)?		Will the tribe share a de-identified tribal list?					
YES	NO	YES		NO		Will the tribe allow the site to be listed?	
Proceed with sampling (Option 1)	Determine whether tribal list available. If no, seek approval for listing site	Does the tribal IRB or research regulatory body approve of sharing a de-identified tribal list?		Will the tribe work with research team to have a tribal member use the list for sampling, following specific procedures?		↓	
		YES	NO	YES	NO	YES	NO
		Is the list of high/sufficient quality to use as the sample frame?	Re-negotiate or seek approval for listing site	Proceed with Tribal Sampling (Option 2b)	List site	Has the study team received approval to begin fieldwork?	Re-negotiate or drop site
		YES	NO			YES	NO
		Proceed with sampling (Option 2a)	List site			Has a Field Interviewer been recruited/hired?	Wait for approval
				YES	NO		
				Use List-and-go	Full listing or wait and do list-and-go		



As outreach proceeds, it will be possible to find out more specific and complete information on the circumstances relating to approaches to develop the sampling frame. For example, we may find that the tribe's membership list is actually in either better or worse form than our initial information led us to believe. This may cause us to select a different approach than the one initially chosen.

Where the full listing approach appears to be the only workable approach for a particular tribal area, we will request formal permission from tribal officials during outreach to conduct that approach. The work will involve in-person enumerations with a two-person team—the Field Manager and a tribal driver—who will conduct a thorough sweep of the tribal areas to account for the locations and addresses of all dwellings. We anticipate that some tribes will provide maps of the tribal lands or Native Villages to use as a guide. During the pretest, we will explore the use of alternative methodologies, including geographic information tools such as Google maps, to verify the address lists developed for the sampling frame.

Compiling the information to develop the sampling frame for full listing will involve a three step-process. First, each large tribal area will be partitioned into tracts (based on postal address files) or “segments” of housing units (based on Census block-level data). For all but the 4 largest tribal areas with more than 2000 housing units, we will select five sub-areas of at least 300 housing units to allow for approximately 30 interviews per tribal area. For the second to fourth largest tribal areas, we will select 10 sub-areas for sampling/listing. For Navajo Nation we will select 15 to 20 sub-areas. Next, the listing sheets and maps will be generated. This activity involves preparing the listing sheets (i.e., making changes to the listing sheet generation program, generating listing sheets, and conducting quality control), editing the listing sheets and conducting quality control both before and after data entry, making the listing maps, and printing and binding of listing sheets and maps. After the listing of segments is complete, data entry of the listing sheets will occur.

Specialized software will be used to allocate the proposed sample of 1,600 potential respondents across the segments within the 40 tribes. Systematic sampling will be used to select household units within a segment. These activities will be conducted by a NORC Senior Statistician. Where tribal membership lists are used and where feasible, sampling will occur by a designated tribal representative with oversight by NORC to ensure quality control.



Replacement

As described above several options will be considered for creating the sampling frame and a detailed decision tree will be followed in order to minimize the need for replacement. As outreach proceeds, we may find new information suggesting that conducting the survey in a particular site is likely to be infeasible, or at least very risky. If so, it may be necessary to replace some of the initial 40 sites with alternates from the list of 20. Replacement will be done sparingly and will occur only after other options have proven infeasible. The decision to replace a site will be approved by NORC, UI, and HUD.

Implementation of Sample Selection in the Field

The plan for implementing the sample selection process in each specific site will have been worked out with the tribe during the outreach process, as described above. When the team arrives at the site, the first step will be to visit the appropriate tribal office and confirm these arrangements.

With smaller tribal areas (fewer than 2,000 housing units) the team should be able directly implement the chosen approach immediately after these visits. For larger tribal areas, however, the geographies will be divided into at least five to “segments” for sampling purposes. This will save substantial costs in the listing process where the listing approach has been selected, and it will save travel costs where the USPS list approach is used. It is recognized that it will be difficult to link tribal membership lists back to Census-defined geographical units, so segmenting will seldom be implemented where the tribal membership list approach has been selected.

In segmenting, for all but the 4 largest tribal areas with more than 2000 housing units, we will select five sub-areas of at least 300 housing units. For the second to fourth largest tribal areas, we will select 10 sub-areas for sampling/listing. For Navajo Nation we will select 15 to 20 segments. We will consider several approaches for defining sub-areas, depending upon the type of site and the source of address information, considering both size of the geographic area and density of AIAN population. In some areas, we may consider PPS sampling of sub-areas rather than random sampling.



To select the segments for any tribal area, we first need to build a sampling frame of segments. Block level housing unit counts will be obtained from Census Bureau 2010 data. Specifically, we will use the counts from Summary File 1. To determine which blocks to include in the tribal areas, GIS layers will be used to include a tribal lands layer and a census block layer. Spatial intersection will be determined using our Geographic Information System (GIS) database. The resulting block key is composed of county_fips (i.e., zip codes), tribal tract, and block.

To build segments, we will use an algorithm to group blocks into sizes of approximately 300 housing units. The algorithm will group blocks sequentially based on the order of blocks within tracts. This will facilitate the grouping of adjacent blocks when possible. Prior to selection, segments from each tribe will be sorted to ensure that those areas selected are geographically dispersed and we may oversample segments that have high proportions of AIAN residents.

Implementation of sample selection for the Household Survey will vary depending on whether the sample is drawn by the research team (research team provides list of cases to field interviewer), the tribe (sample shared with research team to develop the list of cases for the field interviews), or through the list-and-go procedure (field Interviewer will select a random sample of households using a pre-defined sampling procedure [i.e., every k^{th} household] developed by the research team.

Conducting the Survey

Launching the survey at each site will involve a number of sequential tasks. First, the lists of selected households will be generated, which will be used for mailing the advance package to the household, producing case face sheets, and for interviewer assignments. Then, the following procedures will be implemented for: contacting sampled households, key respondent rules, completed interview definitions, obtaining informed consent, and conducting the interviews.

Contacting procedures. Each household selected will receive an advance package about 10 days before the field period start. The Field Interviewer will mail or hand deliver (for those with post office boxes) advance letters to all sampled households and will—assuming this information is contained in the sample file—send special advance letters to multi-unit buildings that may require additional effort to gain access. Some households have post office boxes



rather than door-to-door delivery or may not have read the letter. For these cases, the interviewers will also have a supply of advance packages to give out at the door.

The advance materials emphasize the importance of the study, the study's sponsorship by HUD and non-affiliation with the TDHE, confidentiality of the data, and that participation in the study provides for each family the opportunity to "tell their story" about their housing needs and experiences. Advance materials will include a toll-free 800 line for respondents to call for more information or for questions.

After allowing sufficient time for receipt of the materials, the Field Interviewer will telephone or visit the household to schedule an appointment to conduct the in-person interview and the enumerator observation.

Key Respondent Rules. The key respondent for the household survey will be the owner or renter of the house/apartment or his or her spouse/partner. If the owner/renter is unable to participate in an interview then we will request to speak with the person who is most knowledgeable about family housing (e.g., adult child of an elder). For alternate respondents we will collect information on his or her relationship to the owner/renter, a first name and contact number, and the reason that the owner/renter cannot participate. This protocol will be observed using the Household Screener module of the household survey.

Informed Consent Procedures. The Head of Household or alternate respondent will be asked to consent to participation in the Household Survey. As with the information materials, the content of the consent form will be tailored to different tribal research conditions. The consent form will explain the sample selection procedures; the purpose of the study; the study's sponsorship and non-affiliation with the local TDHE; the data collection procedures and types of questions to be asked; the approximate length of the survey; any discomforts, risks, or benefits associated with participation; and data confidentiality protections. The Field Interviewer will be responsible for reading the full consent form to the respondent, assuring understanding, and obtaining his/her signed approval before proceeding with the interview.

Conducting the Interview and the Enumerator Observation. The Household Survey will be conducted in-person with the identified Head of Household. In addition to gaining cooperation and obtaining informed consent, key elements of administering the Household Survey include:



- Obtaining a complete roster of persons living in the household at the time of the interview
- Administering the modules of the paper and pencil interview (PAPI) instrument in accordance with the procedures covered in the Field Interviewer Training, including resolving inconsistencies detected during the interview and probing to elicit more detailed responses (as appropriate)
- Using the interview aides, including “show cards” listing respondent choices for specific questions in the instrument.

Upon completion of the interview in the home, the Field Interviewer will conduct the observation of housing conditions in accordance with the procedures covered in the training and tribal approvals. A completed interview will comprise responses to all modules and the enumerator observation of housing conditions.

Tribe/TDHE Telephone Survey

The TDHE sample is comprised of a total of three mutually exclusive samples, each drawn with probability proportionate to size. The first consists of the tribal housing offices and/or TDHEs in the sample of 40 tribal areas selected for the household survey. The second sample consists of the TDHEs in the 20 tribal areas identified as reserve sites for the household survey. The remainder of the TDHEs to fill out the sample of 120 tribal areas will not be included in the household survey. Each of these groups will require a different approach and schedule.

The TDHEs that are tied to the household survey sample will most likely already be on our radar because of the outreach effort with the tribe for the household survey. Tribal outreach for this group will include the TDHE sample as well as the household sample. As permission is gained from each reservation, the TDHE interview will automatically be assigned to the field manager managing the household sample for the site. The TDHEs in the reserve sample will also have received some outreach related to the household survey.

For the remaining sample those tribal areas not tied to the household survey or the reserve sample for the household survey – a separate approach and schedule will be used. As permission is gained to interview the TDHE, the case to be interviewed will be assigned to a field manager based on geography and time available for this task.



Site Visit Plans: Conducting On-Site In-Person Interviews

This section describes our plan for conducting in-person interviews in 24 sites, including site selection, respondents, site visit scheduling and on-site activities.

Site Selection. No survey, or combination of surveys, can fully capture the range of tribal circumstances, priorities, relationships, and approaches with respect to addressing housing needs and conditions. The site visit interviews provide an opportunity to present a richer and more nuanced description of these issues in 24 tribal areas. To capture the greatest diversity within project resources, we will select a purposive sample of 24 sites, based on consideration of the following factors:

- Size
- Region
- NAHSDA grantee administration (e.g., tribal housing office, TDHE for a single tribe; multi-tribe/consortia TDHE)
- Need component of the IHBG formula

The sites will be selected from the 40 sites that are participating in the household survey. Initial outreach for the site visits will be conducted in tandem with the outreach for the household survey, so that if a site is replaced for the household survey, it will no longer be considered for the in-person interviews.

Respondents. Respondents will vary in each site depending upon the tribal organization and administration of the NAHSDA and other tribal housing activities. For purposes of developing discussion guides and planning our visits, we group respondents into the following general categories: Tribal Housing Office /TDHE Director, Tribal Leader, Tribal Housing Official or Other Housing Official, and Community Leader.

Scheduling Site Visits. Site visits will be planned over the same data collection period as the household survey. As part of the outreach process, those sites that have been selected for in-person interviews as well as the household survey will receive information about the on-site interviews, including the respondents we will want to interview, the estimated time needed for each interview, and the discussion topics.



For each site, we will assign a member of the project team who will be a site visitor to act as the liaison with the tribe. This person will conduct preliminary calls with the tribe to identify appropriate respondents and suggest possible site visit dates that are convenient for the tribe. Follow-up calls will be made with each respondent to confirm the best dates and schedule interview dates and times. In addition to arranging the logistical details of the visit, these calls serve two other important functions. First, they provide an opportunity to answer questions that tribal respondents may have prior to our visit, and second, they provide a chance for the study team to learn more about the tribal organization. This allows us to tailor discussion guides accordingly for each site. A confirmation of the visit and the schedule of interviews will be provided to the site in advance.

On-Site Activities. Each site will be visited by a two-person research team that will conduct interviews and observations over the course of two days. The site visit teams are composed of experienced staff from the Urban Institute, NORC, Econometrica, and SSI. These visits will be coordinated with the visits for the household surveys according to the preferences of the tribe. Site visits may coincide with the household survey in order to minimize the disruption created by multiple field data collection visits; or they may be scheduled at a separate time if that better accommodates the schedules of interview respondents. Ideally, the site visit and the household survey will be conducted within a short time window to maintain interest and enthusiasm in participating in the study. We plan to conduct 4 -5 interviews per day. We plan to have both site visitors present at each interview whenever possible. This approach assures more thorough interviews and notes, allowing one interviewer to pursue additional clarification and follow-up questions while the other is taking notes. Having two people listening and recalling the interview is helpful in analysis and interpretation as well. However, since there will be two researchers, we do have the flexibility of splitting up to accommodate changes in respondent schedules or adding additional respondents identified while we are on site.

B3. Methods to Maximize Response Rates and to Deal with Issues of Non-response

Methods to maximize response rates include: intensive outreach; use of tribal interviewers; extensive training for interviewers, including scheduling procedures and field supervisor coaching; specific approaches to address barriers to cooperation; incentives for household survey respondents; and follow-up of non-response.



Outreach Activities

The purpose of the outreach effort is to build relationships and effective communication with the sampled tribes early in the study. This is crucial to gaining tribal cooperation for all elements of the data collection so that the project team conducts the fieldwork successfully and in a manner that respects tribal research requirements. Preliminary efforts are already under way to engage the four largest tribes with a known probability of being included in the study sample.

Preliminary Outreach to the Largest Tribes

Highest priority for our outreach efforts are with the Navajo Nation, the Cherokee Nation, the Muskogee (Creek) Nation, and the Lumbee Tribe of North Carolina. We can say with certainty that these tribes will be included in the sample, based on 2010 Census tabulations.

Outreach and engagement focuses on obtaining firm commitments to cooperate with the household survey and the 24 site visits for the case studies. To do this, we will enlist the assistance of key stakeholders (i.e., “Champions”) who can be instrumental to this effort by facilitating outreach to tribes and encouraging partnerships with the tribes to promote participation. The strategy will be jointly implemented by HUD, the Urban Institute, and its subcontractors. Key steps in the process are:

- Research the IRB requirements for each tribe and review this information prior to contacting the Champions, including developing a timeline for needed actions.
- HUD Assistant Secretary sends a letter to a person (or persons) designated to be a key “champion” for each of the four tribes (likely to be the ONAP Area Administrators) who will promote the benefits of participation in the study and solicit cooperation.
- After the HUD letter goes out, the Urban Institute PI or Project Manager and the NORC Task Leader will call the Champions to discuss the best strategy for working with each of these tribes and jointly develop a more detailed strategy. This will specify the sequence of actions (phone calls, presentations, etc.) and specify who will be involved in each action and the target date (actions will run from the first call through negotiations with IRBs). Champions will be asked to offer advice and assistance to ensure strong tribal participation in the study.



Outreach Strategy for All Sampled Tribes

We will reach out to each tribe selected for the household survey. For the subset of 24 tribes that are selected for the on-site visits by the research team, we will refine the outreach strategy to incorporate site visit planning and protocols as needed into the approach below. The following steps will occur:

1. Research the tribal history and tribal leadership for each reservation or native village selected.
2. Inform appropriate ONAP area offices of the tribes and Native Alaskan villages that have been selected for the study sample.
3. Through communications with Area Administrators and Area staff persons, obtain the list of those individuals currently serving as the tribal Chairpersons/Governors, etc., and Executive Directors of housing entities for the selected tribes/villages.
4. Prepare a formal letter of notification of a tribe or village's selection for the sample from *HUD*. These letters can be sent to the elected chief political official of the tribe/village, as well as to the Executive Director of the housing entity, or they can be included in the initial material sent to tribes. This will include notification that the tribe has been selected to one of three conditions: (1) household survey and tribal/TDHE survey; (2) household survey, tribal/TDHE telephone survey, and on-site visits with in-person interviews, or (3) tribal/TDHE telephone survey only. (see Appendix B for sample letters).
5. Through email or phone, confirm a tribal contact that should be sent the project information and accompanying materials.
6. Provide informational material to a tribally-designated contact for dissemination.
7. Conduct an overview presentation by Webinar for tribal leaders either by phone or in person (see item 10) that addresses:
 - The study and its importance/benefit to tribe



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- An overview of topics addressed and types of questions asked in the Household Survey, tribal/TDHE telephone survey, and in-person interviews during the on-site visit
 - Tribal approval to conduct the study and agreement to assist in and facilitate sample selection where appropriate
 - Hiring tribal members to conduct the household survey
 - A description of NORC's role in the project for the household survey (i.e., impartial data collector), along with NORC's Pledge of Confidentiality and Ethics Standards
 - Overview of field work methods for the household survey (sampling, listing, recruiting and hiring, interviewing)
 - Community presentations
 - If time allows, address key study tasks (as identified in Item 8 below)
8. (If needed) conduct a follow-up call at a pre-arranged time with each tribe to address key study tasks, obtain agreement, and develop an Action Plan to execute these processes: research approvals, sampling activities, preparation for fieldwork, appointment of a tribal liaison (if desired) to facilitate contact with the study team, and discussion of tribal-specific concerns.
9. Obtain site agreements. We will draft a memorandum that details the tribal-specific protocol for field interviewers to observe and provide tribal leaders with a copy for their reference.
10. Conduct on-site visits. In some cases it will be necessary to go on site to meet with tribal officials and engage in face-to-face discussion on the topics noted above. We may also be asked to make a presentation in person before a Tribal Council, the tribal IRB, a research review committee, or the community. We intend to do so in a manner most conducive to the concerns of each tribe. We will produce a set of PowerPoint slides or talking points that conveys key information about the study and the study team, and will tailor these materials, as needed. During the visits, we will also share information about the types of questions asked during the household interview. We will circulate copies of the *Household Survey* instrument, if requested, but will ask that they be returned at the conclusion of the meeting.



Outreach Strategy for the Tribal/TDHE Survey

The outreach strategy for the Tribal/TDHE survey is just as important as the strategy for the household survey. The same project staff will conduct outreach for the sites with no household component. For tribes participating in the household survey component, the trained field manager who is also supervising the household efforts will be responsible for the tribal/TDHE survey outreach.

Contact will be made very early in the outreach efforts for the sites selected for both the household and TDHE interviews. The TDHE respondents will be given the full set of introductory materials presented to the tribal authorities and informed of the step by step process that led to the site approval. As a courtesy, if the site requires a personal visit before approval is given for the household data collection, the TDHE will also be visited in person.

Outreach for those sites not involved with the household survey will require a different approach for gaining cooperation. The first task will be to identify the TDHE, followed by an information gathering telephone call. Once the right person is identified, specially designed outreach materials will be emailed or sent. The materials will include an advance letter, project fact sheet and materials describing the Urban Institute and NORC. The TDHE will be then called back to have any of their questions answered, gain cooperation and set up an appointment to complete the interview. If it is deemed that an in-person visit is needed in order to gain cooperation, and a NORC field manager is within 150 miles radius, a visit will be arranged as the budget permits.

Recruiting and Hiring of Tribal Field Interviewers for the Household Survey

To demonstrate respect for tribal sovereignty in the research process, build tribal capacity for data collection, and ensure cultural competency in conducting the household survey, the contractor will make every effort to recruit tribal interviewers within the designated tribal area. Suggestions for recruitment and approval for any hiring activities will be sought from each tribe.

Staffing of field interviewers who are right for the task at hand is essential to the success of the data collection. The contractor will do everything possible to hire two interviewers at each of the 40 reservations (one will serve as the alternate). In the event that they are unable to recruit a qualified field interviewer from the sampled tribe, contractor staff experienced that are



experienced AI/AN interviewers will be used instead. Tribal interviewers will be screened, hired, and trained by the survey subcontractor.

Addressing Barriers to Reaching Targeted Data Collection Goals

As tribal populations are considered hard-to-enumerate, we anticipate challenges in data collection for the household survey. While cooperation, planning, and training are practical efforts that reduce the likelihood of data collection barriers, we recognize that there will be unanticipated challenges to address. We have identified seven categories of barriers to achieving the target number of interviews at each site.

- **Sampling.** Problems could arise both during the pre-interview phase or while the interviewing is underway. In places where listing has not occurred, the field interviewers may find houses are vacant or have been deemed uninhabitable. In this event, we will work with tribal personnel from the housing office, tribal enrollment office, or natural resources/mapping office who are knowledgeable about the area.
- **Tribal cooperation or approval rescinded:** It has to be recognized that a tribe may change its mind about participating in the survey project mid-stream. In such cases we (1) gather details on the nature of the tribe's concerns, (2) renegotiate with the Tribal Council (through the Principal Investigator), and (3) address concerns as directed by the Tribal Council. In the event that a resolution cannot be reached, then we will replace the site with the alternate site.
- **Field Interviewer issues:** Even with extensive recruiting, comprehensive training, and quality field management, sometimes interviewers do not work out on a project. To address this we have a number of do's and don'ts in place as well as a range of back-up options. We will hire an alternate field interviewer at the beginning of the project, rehire and train as time and budget allow, provide extra oversight and nurturing by the Field Manager, retrain the original interviewer as needed, provide flexibility during a family crisis, send in travelers from other areas or research team interviewers who are experienced working on reservation). We avoid in most cases hiring multiple family members and 'best friends.' We have found that that if one does not work out, then the other one often ends up quitting as well, and thus we risk losing the whole team.



- **Gaining Cooperation.** Approximately one week after mailing or delivery of the advance letter, the Field Interviewer will attempt telephone and in-person contact. The study protocol mandates that the initial contact is by telephone, unless information from the tribe indicated that an in-person visit was preferable or if the family did not have a phone. The telephone contact will be used as a means to schedule an interview or an in-person meeting to address any concerns that the respondent has. Field interviewers are issued photo ID badges, a project authorization letter, a confidentiality agreement, and a copy of the study's Certificate of Confidentiality. These tools establish the study's validity and the representative's authority.
- **Respondent Issues:** Field staff will be encouraged to visit each household within the first two weeks of data collection so that any concerns about the cases can be defined very early in the field period. They will be trained to be prepared to address a variety of issues that arise from non-cooperative respondents. This includes respondent refusal, gatekeeper refusal, unavailable for field period, illness, language, and avoidance, to name a few. Our approach to offset non-cooperation will be to offer refusal conversion tools (e.g., letters, calls, a visit), use a different interviewer, employ a telephone conversion team, discuss concerns with the Field Manager on weekly reporting call, and contact households early so that cases in which there is illness or a family crisis can be scheduled at a more optimal time.
- **Community events:** We are mindful that data collection needs to be scheduled around community events and religious ceremonies. It is equally important to recognize that a tragedy, death or crisis in the family or in the community may affect data collection efforts. In such cases we will confer with the tribe about how to proceed in a respectful and responsive manner (e.g., suspending data collection for a limited period of time).
- **Weather and natural disasters:** Weather problems should never be a surprise in field data collection efforts. Natural disasters, to include fires, earthquakes and the like, should always be considered possible. It is our practice to plan for bad weather that may occur during any season, offer weather-related solutions (such as renting a four wheel drive vehicle) to enable field interviewers to travel and get the interviews done, and create a schedule and work diligently to complete interviews before seasonal bad weather sets in. Although it is our aim to keep on schedule, in the event a natural disaster does occur, we must, in deference to the population, stop work for a reasonable amount of time.



Addressing Non-response

Field Interviewers will record each attempt to contact a household. Interviewers will vary their contact attempts to the selected households across the most probable times of contact. Persistent non-contact households will be discussed with field managers; the resulting discussion will generate a new approach. Similarly, the interactions for resistant cases will be discussed and a strategy prepared. Copies of the instrument will be mailed to the field interviewers for in-person administration.

The Field Management staff will meet with the NORC team and produce a list of why respondents may refuse. Refusal letters will be developed to answer these issues. Refusal letters will be available to order from NORC by the Field Interviewer. Possible topics for refusal letters include: (1) too busy, (2) mistrust of the government, (3) confidentiality issues and (4) other topics.

Respondent Incentives

At the close of both parts of the interview, the respondent will receive an incentive valued at \$20. The Field Interviewer will obtain a signed receipt for this transaction. Field interviewers will receive an advance from the project to cover these incentive fees. Incentives have been shown to be effective in increasing overall response rates in all modes of surveys.⁹ 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.

⁹ 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.



B4. Pre-testing of Procedures and Methods

Pretesting the Household Survey Instrument

The pretest will allow us to determine if the questionnaire, procedures, and documents work as planned in a field setting. A total of nine interviews will be conducted at 2-4 sites. The method of contacting and selecting the pretest sites requires further discussion with HUD, as well as the development of a protocol for conducting the pre-test with the tribes selected. NORC currently has established relationships and contacts with approximately 3 reservations nationally that would be good candidates for pre-testing. In addition, there are a number of AI/AN interviewers currently on the NORC staff to facilitate pre-testing.

Field Interviewers will be trained as a group (all sites together on the phone) to accomplish this task. Training will also include a strong reminder that this is a pretest and we are looking for ways to improve all areas of the data collection. Respondent and interviewer feedback will be very important.

We plan to field the pretest for a maximum of 10 days. The pretest respondents will receive an incentive of \$20 for their time and cooperation.

Upon completion of the pretest field work, a telephone debriefing session will take place with the interviewers. Topics will include an in-depth review of the questionnaire and all materials used to accomplish each task. The group will also be asked if there are other job aids or materials that would aid data collection for the main fielding. A debriefing report will be produced in order to make revisions to the instrument.

Pretesting the Tribe/TDHE Survey Instrument

As with the household instrument, the pretest for the Tribal/TDHE survey will be a dress rehearsal for our final efforts. The same sites will be used for this pretest effort as with the household sample. It is expected that 2-4 TDHE's will be interviewed for the pretest. All materials planned for the main fielding will be tested, including strategies for gaining cooperation, training activities, project advance letters, materials describing the project, and the survey questionnaire.

There will be a training held for the pre-test interviewing staff. In addition to reviewing the questionnaire and conducting a mock interview, those attending will also be trained in what to look out for during a pretest. These items will include seeing if the questionnaire flowed



smoothly, whether the respondents have difficulty answering any of the questions or sections, and suggestions for improving the process of gaining cooperation, and for conducting the interview. A debriefing will be held to discuss these issues followed by a written report covering any suggested improvements and suggestions.

Pretesting the On-Site In-Person Interview Guides

The guides will be formally pretested over the telephone with two tribal leaders, two tribal housing office/TDHE representatives, two tribal housing leaders, and two community leaders (a total of eight pre-test interviews). Pre-test respondents will be identified and recruited in the outreach process for the household survey and will be drawn from tribal areas selected for the household survey but not the site visits. The guides will be revised as needed based on the pre-test findings. Finally, since guides will be pretested over the telephone, we will also plan a research team debriefing after the first two site visits are completed in order to consider any additional revisions that might be desirable based on the site visit experiences. The pre-tests will take place during the outreach activities for the household survey, tribal/TDHE survey, and site visits.

B5. Individuals or Contractors Responsible for Statistical Aspects of the Design

The agency responsible for receiving and approving contract deliverables is:
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The organization responsible for administering the household survey and the Tribal TDHE telephone survey is:

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**ASSESSMENT OF NATIVE AMERICAN, ALASKA NATIVE, AND NATIVE HAWAIIAN HOUSING NEEDS
PAPERWORK REDUCTION ACT SUBMISSION
JULY 14, 2011**

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