

Tribal Leader Consultation on HUD's Housing Needs Assessment: Proceedings and Notes

Albuquerque, New Mexico, April 25, 2012

A. Proceedings

Carolyn O'Neil, HUD ONAP Regional Administrator, welcomed the participants and introduced Rodger Boyd, Deputy Assistant Secretary for ONAP.

Blake Kazama delivered the invocation speech.

Jennifer Stoloff, Study Manager for HUD's Office of Policy Development & Research (PD&R), provided a high level overview of the study.

Raphael Bostic, Assistant Secretary for HUD's Office of Policy Development & Research (PD&R), delivered a more detailed overview of the study, including a delineation of what the purpose is, and what the outcomes are. He noted that input will be solicited throughout all phases of the study.

Nancy Pindus, Urban Institute, described in detail the components of the study, including a household survey, a survey of Tribally Designated Housing Entities (TDHEs), and case studies for Native Americans living in urban areas. She also provided more detail on the study team members and pointed out several other sources of data that will be used. Finally, she detailed the research topics for the study.

Chuck Hanson, Econometrica, provided the ground rules for the question and answer period. He then opened the floor to questions from tribal leaders or elders.

B. Questions and Answers

George Gholson: If a tribe is to conduct their own [household] survey, is funding available or will it have to be self funded?

Raphael Bostic: No money is appropriated for such use currently; HUD is willing to assist as much as possible with operation (e.g. training, provide instruments). Regarding expenses in administering the survey (e.g. paying interviewers) and other factors, tribes may wish to consider local University resources that are available including students to perform analysis.

George Gholson: Is the focus on housing on tribal lands? If so, what about those off tribal lands?

Raphael Bostic: Yes, this study is focused on housing on tribal lands. We are open to ideas about how to meet needs of groups not accounted for (e.g. those not on tribal lands).

Olivia Liston: Who is paying for the study?

Raphael Bostic: At the national level, it is paid for by HUD. Regarding local surveys at tribal level, those are not funded by HUD but HUD will assist to reduce the cost burden of executing. I encourage you to reach out to those with an academic interest.

Olivia Lison: Who selected the 40 tribes?

Raphael Bostic: HUD did this based on a complicated mathematical exercise. The goal was a sample representative of the nation; cross-section of tribes by region and size so the results are not skewed and do reflect the broader population. Survey results are ‘blown up’ to become representative of the nation – this requires mathematical methods for accurate profiles at a national level. You can see the variation in the current sample.

Olivia Liston: Please carefully consider the process because all tribes are very unique e.g. rural versus metropolitan. Challenges vary, so please take that into consideration.

Raphael Bostic: That issue is being considered; the goal is to ask enough people that we can be confident that the aggregate number tells us what we are trying to learn. A relevant example is polling currently used in popular media for election coverage. This survey increased in size (number of respondents) relative to the 1996 study numbers in order to capture as much perspective as possible. This is not a census but efforts have been taken to cover diversity as much as possible.

Gerald Hooee Sr.: What is the intended outcome of the survey? How will the results be used if not for funding or funding formulas?

Raphael Bostic: We are hopeful that conversations regarding funding levels are shaped by the results – but at national level, not tribal level (i.e. the “big pot”). The survey is designed to inform those conversations. The goal is then to provide information about aggregate total needs in tribal lands. Information examples “40 percent of units in tribal lands are substandard;” “15 percent of tribal members live in overcrowded conditions;” “Biggest housing problem facing tribal members is access to high quality and consistent power.” Once these types of findings are known, costs can be applied to determine the total national needs and quantify the resources needed to address housing problems and challenges in tribal lands. These arm people to talk intelligently; quantifies need with dollars and cents. Regarding the first question, the most important thing is how tribes use the survey findings; they may be useful for discussions with elected leaders; may be used with members to shape operations; for conversations with local and state leaders not associated with tribes; or potentially for all of those contexts and more.

Gerald Hooee Sr.: For tribes that participate in the survey, are researchers meeting with tribal leaders before the write up to present findings?

Raphael Bostic: Let me share some related information: outreach to tribal leaders will be conducted before any engagement/survey administration occurs. This process is fully transparent; drafts of the report will be available to everyone, especially those tribes surveyed. Factual accuracies are paramount and we will make modifications to any errors identified. The report is intended to be descriptive and objective not prescriptive or subjective (e.g. “40 percent said X”).

Jennie LaFranier: What are the plans for continued consultation with tribes? How were tribes selected for the three different surveys?

Raphael Bostic: We had eight listening sessions around the country for initial input last year. During those, we heard that there was a need for formal consultations. This is the second formal consultation; the first was in Washington, DC in March. Consultations are now scheduled for every HUD region in an attempt to be as open and accessible as possible. You can also contact us in ways beyond those and after today.

We are trying to accomplish several things with these surveys. One, defining what the need is – that is captured by the household survey. Second is to talk to the housing professionals who work with tribes on these issues, such as whether program funding restrictions are needed or should be lifted; flexibility; etc. That is what the other surveys are intended to answer.

Jennie LaFranier: How many tribal members will be sampled in each tribe?

Suzanne Bard, NORC: About 40 households at each site; these households will be randomly selected. Larger tribes may have up to 80 respondents per site.

Raphael Bostic: The goal is to get 1600 respondents total; with 40 tribes, that is an average of 40 people per tribe. But adjustments need to be made based on total population to make it nationally representative. We have a goal of 1600 but some attrition is expected; regarding non-respondents, a 25% attrition rate is expected, which is very low for most surveys. 40-60% attrition is common with surveys. Our hope is that these consultations and previous outreach will help increase participation and reduce the attrition rate as it places an emphasis of importance on completing these surveys.

Jennie LaFranier: I appreciate that HUD will be hiring and paying tribal members to conduct surveys.

Suzanne Bard: We will seek tribal input to determine if that is best methodology for each tribe. We are developing outreach materials as well to inform the respondents. There will be an individual protocol at each tribe e.g. tribal IRBs; so we will be approaching each in advance.

Jennie LaFranier: If surveys don't go as well as hoped, how will that represent tribes? What if we don't meet the survey response rate expected? Will the study still be conducted and results still used?

Raphael Bostic: There has to be some consideration as to how it could go wrong. One possibility is that the survey is not understood. We have protocols in place to address this such as training for interviewers. A second possibility is if the response rate is not sufficient. In that case, HUD will have to consider whether they can say what they have been mandated to say. Statistical experts can determine to some extent whether data is sufficient or too weak to make conclusions. I have never personally worked on a project that went exactly as planned. Midcourse adjustments are often made to arrive at expected outcomes and we maintain a degree of flexibility in this project to make those kinds of modifications. We are very mindful of the resources expended on this project.

Olivia Liston: I am concerned that information you are asking for can be beneficial or harmful. Most tribes require permission to conduct research – they want a warranty that results won't hinder the tribe in any way. The challenges using HUD dollars is an issue that should be addressed as well as infrastructure.

Raphael Bostic: In terms of use of funds, this survey is not making judgments about use of funds; we are hoping it provides information about use of funds. The term “weaknesses” may not be most accurate descriptor as we are attempting to determine need not weakness. The Agency is about devoting and deploying resources to help people who have less or not enough to achieve the “American dream”. There is one remarkable example of what information can do: in Minnesota the Corporation for Supportive Housing partnered with tribes in the Duluth area and administered a survey about homelessness in tribal lands and in the surrounding area. This determined that no one is truly “homeless” due to the cold weather conditions but that instead they live transiently with others. The formula for homeless money allocation changed at state legislator as a result of this study; this demonstrates that identifying and quantifying need can have positive impact. The best way to prevent harm is to know the truth; there is no room for misrepresentation when the truth is known and this survey will help determine the facts, rather than stories or anecdotes that carry little weight in Washington.

George Gholson: How did the survey sample get determined? Did gaming status have an impact on selection? California has one tribe as part of the 40 sample tribes selected yet there are 109 recognized tribes in CA (just shy of 1/5 of national total). Will we be adequately represented?

Raphael Bostic: The answer to your last question is yes. This is about the national population not about tribe counts (i.e. people as opposed to tribes). The goal is to represent the people. 40 tribes is less than 10% of all of those federally recognized tribes, but we don't need to sample a lot of people to get national representation. What usually happens is that you partition the world according to certain characteristics (e.g. big vs. small, northern vs. dessert, Alaska vs. mainland) that splits tribes into ‘buckets’. Every tribe in a bucket shares 4-5 characteristics; the sample is randomly drawn from each bucket to get on the list. This is random from each bucket and each bucket is represented.

Nancy Pindus: The presence of gaming was not a criterion for inclusion in the survey.

George Gholson: To create a good needs assessment the issue of gaming must be considered. For example, a tribe in CA with less than 100 persons running a multi-million dollar casino will have minimal needs. One tribe in CA is a gaming tribe in a tourist area; their needs are very different than one based near a major city with better economics. Gaming should be taken into consideration.

Raphael Bostic: Random is random, so gaming tribes will be represented as well as non gaming; neither will be over or under represented. The issue raised regarding very small tribes is valid. A minimum of 150 members is the standard for this study but randomness will help preventing skewing of results.

Jennie LaFranier: Do we need to consider economic conditions on each homeland such as gaming or natural resources? Economic conditions play a huge role in response and should be considered. I did not look at the questionnaire but this plays a big role and needs to be part of the assessment.

Raphael Bostic: It is impossible to fully capture the diversity of conditions but we are trying to do random draws to capture as much as possible. The economic conditions will be captured by the survey. The technical feat is to develop a sampling method that captures the various characteristics (e.g. 14% gaming; 25% rural, etc.) The goal is to mirror the national distribution.

George Gholson: Does randomly selected mean put into a bucket and chosen? If so, wouldn't California have a higher percentage of selection?

Raphael Bostic: What is the number of people total in California tribes? That is a better metric – that is the statistic we should focus on. Tribal population is a characterization used for selection.

Jennifer Stoloff: The sampling technique is explained in detail in your packet of materials, but basically this is a clustered design. It is used by HUD because populations are clustered across the country and so we ranked tribal population size proportionately by region.

George Gholson: So it is skewed?

Jennifer Stoloff: It represents the Native American population at the household level.

George Gholson: Smaller tribes face difficulties that larger tribes do not, so this needs assessment is not accurately reflecting of these tribes.

Raphael Bostic: No, it represents the national need. Smaller tribes are a very small percent of the total population.

George Gholson: Smaller tribes need better representation.

Raphael Bostic: After aggregate numbers are determined, resource allocation decisions should be made. This may include consideration by tribe size. But that is not what this study is seeking to do for quantification. This is a reasonable estimate of approximation for what an average member of a tribe anywhere in America might be facing. It will not reflect what any one tribe is experiencing – averages by definition wash variation. But it does allow a conversation about need. Hopefully these conversations will be prompted by these findings. There are no resources to perform a complete census to include every small tribe at this time.

Richard Barrett: I am leaving 4 items today; I have a long history in housing since 1968. I helped formed NAIHC in 1974 and helped formed regional offices in MN, MI and more. I hope something comes out of this study and positive change happens for all the tribes across the country.

Raphael Bostic: Thank you, I share in the hope that this makes a difference for tribes.

Ron Ryan: Will the completed report on the surveys be circulated before going to Congress? If so, how can we obtain one?

Raphael Bostic: We will be making drafts available before the report is finalized; comments will be accepted regarding accuracy of various aspects of report. Usually there is not a public comment period (as required by regulations for other efforts). This experience has made it clear that there is interest on this issue and it is my hope that this survey is a beginning of a conversation rather than end. The study will raise issues and interest to generate energy to answer questions it raises. I do not anticipate public comment in the conventional way but HUD is considering a conference or series of conversations to discuss what the report means, what it didn't answer, and how it can accelerate an understanding of need and solutions. PD& R is doing a lot more outreach and making reports and findings accessible to lay people. We are the host of conferences related to areas such as homelessness, elder housing, HOPE VI, etc. and we are trying to engage communities in a proactive way so there is a common understanding of important issues and questions. The expectation is that this survey is a beginning rather than an end of conversation. The conference idea faces challenges such as timing issues (these events are hard to coordinate quickly) so we will have to seek ways to have simultaneous responses as report is released. We will provide notifications and tribes may coordinate to respond or do so independently. HUD will welcome input but will not change what is in the report since that it is designed to be a descriptive and technically accurate report without policy discussions, etc. The goal is to advance the state of housing.

Gerald Hooee Sr.: I still do not understand what outcomes are going to be reached for and how it won't affect funding and funding formulas.

Raphael Bostic: Ultimately I hope it will affect formulas and funding. The report changes conversation to support policies that affect tribal lands in a positive way. The survey and report themselves do not change policies. A report is information – what happens with the information

is up the people who talk about it and shape the future direction. Much of the conversation today focused on how this survey cannot make funding decisions at a local level but it can change the conversation about what issues are important and matter today. HUD program designs and emphasis is currently based on a 1996 understanding – this effort will produce something more recent and systematic (information and data).

Gerald Hooee Sr.: Is it in HUD's mind to advocate with policy makers and funders for tribes for an increase in funding?

Raphael Bostic: That is a political question. I can only speak for those I work with and my own opinion. Yes, this information would be critically important to advocate with tribes such as Assistant Secretary Sandra Henriquez's actions currently. But I cannot speak to other administrations and other offices. These kinds of statistical findings and such can hammer points home. There is one other reason for interest in doing this; to answer the question –what is the biggest need on tribal lands and how do you know? My voice is a powerful voice of commitment of the Office of Policy Development and Research.

Gerald Hooee Sr.: A conference in Washington DC a few months back dealt with these same issues with many of these same attendees. There was an opportunity then to present position papers to state representatives. Much of that referenced questions in this survey. Were those position papers and other information submitted shared with HUD to develop these surveys?

Raphael Bostic: Those materials were not submitted directly to us; please send them to us if you have things you want considered on this study. Many channels – email, website, mailing address are available for submission. We are aware of a survey instrument developed by the Navajo nation but otherwise please do send things directly to PD&R.

Andrew Klotz: Are the surveys being administered in Native languages? I understand the methodology but my fear is that the national numbers get applied to individual tribes. For example, we nationally find that 15% of houses dilapidated but some tribes have 40% dilapidated. Funders don't understand the distinction – what mechanisms are in place to prevent this?

Raphael Bostic: This is an allotment program – we don't decide how funds are applied. A national pot of money is allocated to local control for distribution. Your concern suggests a level of determination far less than what is reality. We will consult with tribes to determine if the survey will be more effective if it is administered in a native language. Interviewers can do some real time translation since they may be tribal members themselves. We are culturally sensitive, so administration of the common survey will have flexibility.

Denise Zuni: Please date documents that are being shared because there seem to be inconsistencies which can be addressed by date. Is it the intent of HUD to do a web survey of all TDHEs as is indicated in one document?

Jennifer Stoloff: The web survey for TDHE's is for the group not in the 120 in the sample list. In other words, it is optional for those not in the sample.

Denise Zuni: FAQ sheet states that 120 tribes will be selected to do the survey?

Jennifer Stoloff: Yes. Some tribes work through a TDHE, some do not. Only 40 tribes will be selected for the in-person household survey.

Denise Zuni: Are you still at this point taking suggestions to survey tools?

Raphael Bostic: Yes.

Denise Zuni: Tribes can submit those suggestions through web site? Or to email?

Raphael Bostic: Yes.

Denise Zuni: How will HUD handle requests from tribes that aren't on list but want to be included in the survey?

Raphael Bostic: This really is a random selection process but interested tribes can send email to Jennifer Stoloff for her review. Adding individuals reduces the randomization and therefore the national representation.

Denise Zuni: FAQs states that HUD is exploring ways to have additional surveys included as a part of the final report. Are any methods determined yet?

Raphael Bostic: Yes and no. We have continued discussions and it depends ultimately on how many tribes respond with that request. We cannot fully answer until we see the results; the team is worried because of complications of statistics/math that requires careful consideration so as to not introduce biases.

Regarding the TDHE web survey, however, we heard early on that everyone wanted to be included. We have created some facility to allow for that to some extent. There are fewer TDHE entities so a web based survey is feasible. At the household level, it becomes extremely difficult.

Nancy Pindus: Regarding TDHE web survey, the household survey provides national numbers; the TDHE survey is an opportunity for every single TDHE to participate in this study. These won't be used to determine national numbers but will be used to inform issues previously noted (e.g. economic conditions, geography, tribe size).

Tina Notah-Enas: My comments are from a housing perspective: I have been delegated by Gov. Mendoza to speak on his behalf and I am currently the acting director. The survey questionnaire is very lengthy. Yet a few key questions are not in the survey; perhaps I've overlooked but the primary question – what percentage is substandard? HUD policies create barriers. What is preventing people from owning a home or qualifying for low rent units? Other question to

consider: what is the definition of land based (tribal, allotted, state)? Another hindrance and reason why people live as they do is due to a lack of infrastructure. Regulations such as environmental review take 3-6 months and some lands are landlocked and are deemed non buildable. What is missing from this survey is why people are living that way. Regarding the section on income – this is a factor (living off welfare, etc.). Our people are surveyed to death. You need buy-in from people because entities come in and we never see results. Congress reportedly wants to quantify the substandard living but will we ever truly meet needs? This is a huge population to provide housing for.

Raphael Bostic: This is a central issue, that the survey is too long, but then there are additional questions people want added. This is a recurring issue. The survey lasts about an hour according to field testing. What is most useful – for everything added, find something to remove. In suggestions, provide feedback on what to add, but also then what to remove. There is broad support for the current questionnaire based on previous outreach.

Tina Notah-Enas: The survey requires another review to determine what questions to add/delete. It requires a certain expertise or knowledge to answer some questions such as roof type. If hiring tribal members, must be trained to perform adequate observation of home.

Raphael Bostic: That is correct. We are providing training to the interviewers with guidance to make assessments. There is always a field for responses such as “can’t tell,” or “unable to determine” which is an ok answer as well.

Roberta Roberts: Has your department in recent years done anything related to this kind of survey for another race or nationality for this magnitude and if so, what were the results?

Raphael Bostic: We have not done a survey of African American community. This study effort is due in part to the relationships between our governments and the nature of the funding. We do detailed surveys on a host of people on a host of contexts such as Section 8 voucher holders, grant recipients, communities on sustainability, etc. We seek information in ways and for populations for which programs are targeted such as CDBG programs; Public Housing incentives. One assessment done on PD&R cited that not enough of these evaluations were done and that our obligation to monitor, track and report was not taken seriously enough. The Native American community has been neglected probably more than any other; an extended period of no attention is not acceptable. I am glad Congress has appropriated resources to do this survey directly with some degree of rigor for confidence in results.

Anthony Tillman: Regarding expert panel as listed in justification, what criteria were used to select these persons? My fear as a young Native American male is that with economy as it is, funding for all tribes will be pulled or “cut”. To address this, could the IHP be modified so the tribal voice is heard?

Raphael Bostic: That's probably doable. I do not understand that there are restrictions to prohibit tribes from funding survey efforts. The notion of an expert panel, this helps administer the study in a culturally appropriate way, requires that we look for people with a deep knowledge of how tribes operate socially and politically. We also need to understand the math/statistics, and the intuition of survey instruments and questions. The expert panel is not a primary or sole way of getting information or input. Exercises such as today are at least as influential as an expert panel.

Jennifer Stoloff: The panel is composed of a mixture of the types of people Raphael mentioned – academics (who research tribal housing needs), and representatives from some tribes (members) with experience working with housing offices. The selection process includes availability and willingness to participate along the project path. We are using the panel and these consultations and other venues to get more feedback.

Nancy Pindus: Regarding the panel, it is a mix of persons and they have already provided helpful input.

Michael Chavez: Regarding panel of experts, I have a concern about the individual from Wells Fargo bank. The Albuquerque branch does not support Section 184 and does not work with tribe. What have you done working with other federal agencies in conducting this study? Others have conducted studies; how are you coordinating to reduce burden on tribes?

Raphael Bostic: I have no comment on the representative from Wells Fargo, this can be discussed later. I am not aware of housing related surveys from other federal agencies – please let me know if you are aware of such studies. Please do share as ways to coordinate reduce costs and burden are important to us. The administration currently is very pro interagency collaboration such as the Place Based initiative since 2008.

Blake Kazam: I serve on the expert panel. I want to share with others how seriously I took this because I understand how this will impact Congress. For example, the possible NAHASDA impact – I see the survey as an opportunity to answer questions such as what has NAHASDA done. I fully participated and want to note that this is HUD's second trip across the country soliciting input. Due to these consultations HUD scheduled for the tribes, the study results are now not due out until 2014. This is putting tribes at risk, so tribes should help provide ammunition to get this study underway. I appreciate what Raphael said about bringing results to an assembly to discuss and strategize and collectively approach the Hill with recommendations. I do think that conference is necessary.

Raphael Bostic: I want HUD to hold that conference as it is a powerful symbol for US Government to convene that as a next step. I also support a series of conversations held by tribes themselves. I too am impatient about getting underway and done but I think it is more important to do this study with tribal input and commitment rather than simply doing it quickly.

Denny James: Regarding the telephone interview, one document is recently updated in March 2012 and yet the survey was last updated in 2011. Why is there a discrepancy? How will local surveys impact national? How are 1280 respondents determined to be representative of tribes?

Raphael Bostic: Regarding 1280 respondents, this is a statistical determination. The date discrepancies are due to the receipt of comments but we are not updating any document for one point; we need a sufficient number of comments. Some survey tools get more attention than others. There remains unresolved territory regarding local surveys. The frame is 40 tribes to get a nationally representative sample. To the extent that other tribes undertake local surveys and use the same instrument, there may be an opportunity for a supplement or appendix to report on results of those surveys (perhaps in aggregate so no tribes are identified individually) and this could lead to interesting contrasts. It is difficult to aggregate results of national plus local surveys due to statistical considerations; that sort of thing does not happen very often in practice.

Michael Chavez: I support doing the right thing the right way, as well. That is the purpose of these consultations and the efforts are appreciated. Zuni Housing Authority is conducting an inventory and assessment of housing, scheduled to be underway this summer. It would be nice to coordinate such an assessment with HUD. Do you have any ideas on how to coordinate this assessment?

Raphael Bostic: Sure there are, and we should think about that. I need to learn more about your approach to answer that question. Please look at the instruments for this survey and reach out to HUD for a conversation to possibly integrate studies.

Gerald Hooee Sr.: I am submitting a written statement. I agree with prior statements that these need to be done and update old studies due to the increase in populations. I acknowledge that HUD has responded to request for consultations. I would like to see a conversation emerge regarding how to change formulas that affect tribes to meet unmet housing needs. This survey can help address at least some of the needs and wants. I understand the limitations that affect all of us and see that you are trying to do what is in the best interest of our native communities and nation. I ask that comments, statements, and questions are seriously considered during implementation of the survey and that HUD advocate for native tribes as we need help and want to collaborate with all federal agencies.

Raphael Bostic: I appreciate those remarks and remain committed to do this the right way. We are seeking feedback and suggestions and will implement as much as possible.

Roberta Roberts: Statistics and data can be viewed different ways. The need is great and I am interested to see comparisons between the surveys. I hope that the Hill will see the report results as a reinforcement to need as conveyed presently. Third party echoing these sentiments should provide more support. Thank you and looking forward to end results.

Raphael Bostic: Thank you. Don't stop lobbying; that's your job. And it is the Government's job to respond and perform research to support the people.

Raymond Jones: You touched on large tribes and land base vs. small tribes and land; regarding funding, it is often small tribes versus large tribes. The infrastructure needs vary based on land size. What bothers me a lot is the real picture of housing e.g. Navajo doesn't have figures on how many units of housing, just many guesses and there are issues with accounting for Veterans and homeless.

Raphael Bostic: This is a larger issue and exactly why this is a beginning and not end of a conversation. I do believe that once people see the value of information they may change how they do business. There is a data dashboard started by the Secretary of HUD surrounding certain goals. It captures outcome data and answers the question "what did the money do?" This has changed how HUD operates, a culture change. We now seek out certain information and use it in particular ways. There is real value in having accurate information and regular monitoring and evaluation. Better information equals better decisions.

Raphael Bostic:

Thank you for spending time participating today. It is very important that we do this and do it well. Information can allow a shift in the balance of power. It can make stronger cases – this is an important tool. I want to emphasize that myself and the PD&R staff views this as a partnership activity; it looks like a HUD survey but it is a community survey. We need to ensure it happens in a way that community is comfortable with so it provides the best possible information. We want it to be transparent. There are real constraints- funds, survey length, etc., that demand tradeoffs and HUD is trying to do best they can and we remain open to suggestions. Any rumors that decisions were made already and this is a show should be discounted. I am too busy to do any shows. This study is significant and has the potential to change things. We have received incredibly important and valuable feedback from today and future consultations will help inform us to make this a better survey. That is the goal, to be as good as possible for the best possible impact. Lastly, I hope that this is a beginning of a long term engagement. I am an economist and three years ago when I was starting at HUD, didn't have any experience with tribes. I am now adding these experiences and I look forward to future years.