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U.S. Department of Housing and Urban Development  
Office of Policy Development and Research

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# **Feasibility of Expanded Use of Section 8 Vouchers by Indian Housing Authorities**

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**March 1992**

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BY INDIAN HOUSING AUTHORITIES**

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## I. SUMMARY

This study responds to a Congressional mandate, under Section 561 of the 1990 National Affordable Housing Act, to examine the feasibility of greater use of Section 8 vouchers and certificates by Indian Housing Authorities (IHAs).

The study relies on decennial census information, Bureau of Indian Affairs (BIA) data, discussions with HUD Central and Field Office staff, and on consultations with IHA officials and national experts. The analysis provides an exploratory examination of the heterogeneous housing needs of American Indians and Alaska Natives (hereafter referred to as American Indians/Alaska Natives\*), the current level of use of vouchers by IHAs, and of various barriers limiting the use of Section 8 vouchers by IHAs. The fact that IHAs function in such a variety of environments-- from urban enclaves to remote areas-- makes generalizations on this subject problematic.

Census and BIA information indicate that a large number of American Indians/Alaska Natives live in housing which is severely substandard or overcrowded or both and that the extent of housing deprivation, both for homeowners and renters, significantly exceeds that of the general population. For example, over half of American Indian/Alaska Native households have no central heating (1980 data) and over 17 percent of households are overcrowded (1990 data).

The key finding of this study is that while the limited availability of privately owned, affordable rental housing in many American Indian reservations will necessarily limit the use of vouchers, there are a number of IHAs which appear likely to be able to use vouchers effectively. Currently 16 IHAs use vouchers, but key HUD Field Office staff estimate that up to 80 of the 183 IHAs could make some use of this form of rental assistance.

There are, however, administrative difficulties resulting from the fact that IHAs function outside the programmatic structure through which Section 8 assistance is delivered. Also, like most small rural Public Housing Authorities (PHAs), there is insufficient demand for vouchers within IHAs to fund the administration of the program.

\* This term will be used throughout the report except where different terms are used in direct quotations from sources or individuals, in the names of organizations (such as Indian Housing Authorities), or where the context makes clear reference to either American Indians, or Alaska Natives, specifically.

In addition, a number of social-cultural factors impede the use of voucher assistance. For example, most American Indian/Alaska Native households strongly prefer homeownership; many IHAs fear that acceptance of vouchers will result in loss of new construction programs; and some American Indians/Alaska Natives experience housing discrimination in their search for private sector rental housing.

Based on the information collected it appears clear that there is a need to increase information sharing and training on the potential feasibility of voucher use by IHAs. Improved efforts to acquaint IHAs with the voucher program, to encourage their use of the program, and to provide them with assistance appear appropriate based on the findings of this exploratory research.

It is clear from the findings of this study that some IHAs have overcome administrative and social-cultural obstacles to make use of Section 8 vouchers. It would appear useful to promote awareness of these models--such as the use of regional IHA mechanisms or the use of state PHAs to administer the program where IHAs are small and isolated--in the process of providing education and outreach to IHAs.



## II. INTRODUCTION

This report responds to a Congressional mandate, under Section 561 of the 1990 National Affordable Housing Act, to conduct a study "to determine the feasibility and effectiveness of entering into contracts with Indian housing authorities to provide voucher assistance".

The report includes background information, an assessment of the use of vouchers by Indian Housing Authorities (IHAs), and a discussion of barriers to the increased use of Section 8 vouchers by IHAs. Appendices provide information on three IHAs where vouchers have been used, data on American Indian/Alaska Native housing need and characteristics, and summaries of comments by HUD staff on this subject.

Although the legislative language refers only to "vouchers", the issues covered in this paper apply to Section 8 certificates as well. Hence, the report deals with Section 8 rental assistance in general, and the term used in the paper is "vouchers" except in the section explaining the Section 8 portability rules, which are different for the voucher and certificate programs.

The methodology for this study included consultation with a non-random purposive selection of representative IHAs. Information and opinions were also gathered from all HUD field directors who manage American Indian/Alaska Native housing programs, Bureau of Indian Affairs (BIA) staff, members of the National Commission on American Indian, Alaska Native and Native Hawaiian Housing, and other experts. Information on American Indian/Alaska Native housing need was obtained from a variety of sources, including the 1990 Decennial Census.

Two national American Indian/Alaska Native groups were also consulted to obtain further insight into this subject-- namely, the National Commission on American Indian, Alaska Natives and Native Hawaiian Housing, and the National American Indian Housing Council.

The data presented do not represent a statistically valid sample of IHA opinions collected through formal survey instruments. In addition, much of the relevant census data for 1990 are not yet fully available for use.

### III. BACKGROUND

#### Major American Indian/Alaska Native Groups

The 1990 Census enumerated nearly two million American Indians/Alaska Natives in the U.S. compared with nearly 1.5 million in 1980. (This 33 percent increase reportedly relates partly to American Indians' and Alaska Natives' tendency to increasingly identify and report themselves as American Indians and Alaska Natives as well as to actual population increase). This total population can be divided into four sub-groups:

<u>Sub-Group</u>	<u>Population</u>	<u>% Pop. in Each Group</u>	<u>Number of Households</u>
1. American Indians/Alaska Natives living off reservations and Alaska Native Villages	-- 1,273,844	65.0	415,968
2. American Indians living on reservations and Trust Lands	-- 437,357	22.3	102,213
3. American Indians on Oklahoma Tribal Jurisdiction Lands	- 200,789	10.2	61,372
4. Alaska Natives in Alaska Native Villages	-- 47,244	2.4	11,819
Total	1,959,234	100.0	591,372

The distinction between American Indians living on reservations or Trust lands and those living on Tribal Jurisdiction lands in Oklahoma is important to the central issues in this paper and requires a brief explanation. "Reservations" are communally held lands, in which the U.S. Government holds legal title, and the undivided beneficial interest is held by the tribe as a single entity. By contrast, American Indian land in Oklahoma was allotted to individual American Indians rather than to the tribe.

Reflecting these differences, IHAs on non-Oklahoma reservations serve predominantly those American Indian households residing on reservations, while Oklahoma IHAs serve both American Indians and those who are not American Indians residing on interspersed parcels encompassed in the IHA's jurisdiction. In some programs administered by Oklahoma IHAs over half of the assisted households are not American Indians.

American Indians/Alaska Natives living off reservations and Alaska Native villages (the first sub-group above) are eligible to receive housing subsidies in the same manner as any eligible American household--through application to the appropriate agencies in the jurisdictions in which they live, with no preference given for ethnic background. (By contrast, IHAs can target their programs to American Indians/Alaska Natives even if they cannot give them "preference").

This paper focuses on the other three sub-groups above, which involve American Indians/Alaska Natives living on reservations and Alaska Native villages and American Indians living on Oklahoma Jurisdictional lands.

### American Indian/Alaska Native Housing Need

Limited data available from the 1990 census reveal that about one-third of all housing units located on American Indian reservations or Trust lands were renter occupied. Census data (1980) also indicate that nearly 39 percent of American Indian units on reservations and Trust lands were overcrowded (more than 1 person/room).

While the 1990 Census data is not yet fully available, preliminary information on the ten largest reservations is that 37.9 percent of all rental units and 47.7 percent of owner units were overcrowded; the vast majority of these units are occupied by American Indian households. When those who are not American Indians living on the reservations and Trust lands are included, the percentage of overcrowding on reservations drops to 17 percent for owners and 19 percent for renters. There is, however, a fair degree of variability in the degree of overcrowding among both the largest reservations and Trust lands, as well as among those tribes which currently have some level of use of vouchers.

Since all 1990 census data are not yet available, 1980 census data are used to describe housing conditions on reservations. As of that date:

- 16 percent had no electricity
- 21 percent were without piped water
- 24 percent lacked complete plumbing
- 54 percent had no central heating

The median household income of American Indians on reservations and Alaska Natives in Alaska Native villages was 54 percent of the national average in 1980, and 43 percent of such households were below the poverty line.

There is considerable variance among tribes in the degree of housing deprivation. For example, the percentage of households without running water ranges from 4 percent on the Blackfeet reservation to 51 percent on the Navajo reservation.



The Bureau of Indian Affairs, in the Department of the Interior, gathers estimates of housing need from tribal leaders on a regular basis. The estimates are not developed in a systematic manner but represent an informed estimate of need. According to BIA 1990 data, about 39,000 American Indian/Alaska Native housing units are in need of renovation, and nearly 50,000 households need new or replacement housing, as they either have no housing or live in severely substandard units. (Appendix B provides additional information on the demographic characteristics of American Indians/Alaska Natives, with a particular focus on housing issues.)

### Major American Indian/Alaska Native Housing Programs

Federal housing programs which benefit American Indians/Alaska Natives are generally variations of the principal existing housing subsidy programs, rather than programs specifically conceived for American Indian/Alaska Native households. Even the Mutual Help program, which has certain unique features, is an offshoot of the low-rent public housing program.

The current principal programs which benefit American Indians/Alaska Natives living on reservations and in Alaska Native villages are:

1. Low-Income Public Housing: HUD's Office of Indian Programs refers to this program as "Rental Housing";
2. Mutual Help Housing (HUD)
3. Housing Improvement Program (BIA)

The Rental Housing program is basically the conventional low-rent public housing program as authorized by the U.S. Housing Act of 1937. Approximately 24 years after the enactment of this law, HUD's Public Housing Administration issued legal opinions in 1961 that American Indians/Alaska Natives were eligible to participate in this program, and that IHAs could be established to administer the program.

As with public housing developed by Public Housing Authorities (PHAs), HUD provides for capital subsidies through an Annual Contributions Contract (ACC) with the IHA. Once the housing is constructed, HUD provides operating subsidies to make up the difference between the IHA's anticipated income from rents and the total costs for maintenance, utilities and administration.

Since the first application for such rental units was received from the Oglala Sioux Indians of Pine Ridge, South Dakota in 1961, HUD has funded a total of almost

28,000 rental units, the vast majority of which are single family units. Another 2,000 units have been produced under the Turnkey public housing program, which provides for ownership of units.

Units in the IHA Rental Housing inventory qualify for assistance under HUD's Comprehensive Improvement Assistance Program (CIAP) which provides funds for capital repair and management improvements for all public housing units. In FY 1989 and 1990, IHAs received a total of \$96 million, or about 2.7 percent of the total CIAP funds for modernization and repair. The 1990 National Affordable Housing Act allows CIAP funds to be used in connection with Mutual Help housing units in addition to the Rental Housing units.

Indian Housing Authorities also receive operating subsidies under HUD's Performance Funding System to make up the shortfall between projected revenue and operating expenses. Such subsidies have climbed sharply, from \$11 million in FY 1980 to \$58 million in FY 1990.

The Mutual Help program, involving subsidies for single-family homes, was initiated in 1962 to provide homeownership opportunities. Under the Mutual Help program, families sign an Agreement with the IHA which defines their obligations over the 25-year term of the contract. In addition to the required contribution of \$1,500 in land, materials, money or labor, the family must pay between 15 and 30 percent of its adjusted income (or at least an administrative charge), and it is also responsible for all utilities and maintenance costs.

As of January, 1992, nearly 50,000 Mutual Help units have been developed, which represents about 63 percent of the total number of HUD-assisted units to date. Of this total, over 7,000 units have been fully paid off by the homebuyers and are no longer part of the program.

The Housing Improvement Program (HIP), administered by the Bureau of Indian Affairs, was created in 1965 to provide housing assistance in the form of grants to American Indian/Alaska Native homeowners not assisted by other programs. Although it principally provides assistance for the repair or enlargement of existing housing, it also provides funds for down payments or construction of new housing. By 1990, the program had provided grants to over 71,000 American Indian/Alaska Native households for repairs, to 2,825 households for down payments, and to over 11,000 for construction of new homes.

## Indian Housing Authorities

There are currently 183 IHAs operating in typical reservation areas, and in certain unique environments such as Oklahoma, California ("rancherias", or small reservations) and Alaska Native villages (regional and village corporations). These IHAs represent 267 American Indian tribes and nearly 200 Alaska Native villages. The difference in the number of IHAs, as opposed to tribes or villages, is explained by the fact that some IHAs serve as umbrella agencies for a number of tribes and some tribes have not formed an IHA. The number of IHAs has increased each year as tribes expand their ability to use available HUD resources.

The majority of the IHAs are very small and operate fewer than 500 units. Only 15 IHAs have unit inventories of 1,000 units or more; however, these IHAs manage or administer about 45 percent of the total number of HUD-assisted units.

## HUD Administration of American Indian/Alaska Native Housing Programs

HUD funds for the two principal American Indian/Alaska Native housing programs (Rental Housing and Mutual Help) are administered through the Office of Indian Housing (OIH) in HUD's Central Office. Beginning in 1990, the OIH developed a single, national Notice of Fund Availability (NOFA) covering both the Rental Housing and Mutual Help programs. The NOFA does not separate funds for the two programs but relies on applications from IHAs to indicate relative demand for the two programs. Funding decisions by HUD's regional Offices of Indian Programs (OIP) are then based on factors outlined in the NOFA, including housing need and administrative capability.

Under the Rental Housing program, the HUD Field Offices contract with the IHAs, using Annual Contributions Contracts, and the IHAs then either act as the developer, by building new units or rehabilitating existing units, or they contract with private developers to obtain units, or they acquire existing units if available.

The six OIP Field Offices, established in 1980, are located in Chicago, Oklahoma City, Denver, Phoenix, Seattle and Anchorage. Three of the six offices are located within HUD Regional Offices, and three within HUD Field Offices, making for an administrative structure which accommodates the concentration of American Indian reservations in a few HUD Regions. While these offices do not report directly to OIH in Washington, DC, up to 90 percent of their activity involves the housing programs administered by OIH.

Subsidies for IHAs are delivered by OIH at the HUD Central level and the six OIP offices at the field level. Staff in these HUD central and field offices are devoted almost entirely to the administration of the Mutual Help and Rental Housing programs. Generally speaking, the OIH and OIP offices have had little to do with the "regular" HUD offices or with PHAs; this explains why the OIP offices have little knowledge of, or involvement in, the Section 8 program.

Previous to 1991, HUD OIP staff had relatively little involvement in the Section 8 program. However, in FY 1991 the annual Section 8 voucher NOFAs specifically indicated that IHAs were qualified applicants. At the same time, administrative changes were made to involve OIP staff in rating applications in the selection process.

#### **IV. THE USE OF SECTION 8 VOUCHERS BY INDIAN HOUSING AUTHORITIES**

Since its inception in FY 1975, the tenant-based Section 8 rental assistance program has become HUD's major subsidy program for assisting needy households. The program has two variants: vouchers and certificates. Under both programs, families apply to Public or Indian Housing Authorities for assistance and, if they are approved, they select units on the open market which meet their needs. Assuming the unit meets HUD's housing quality and occupancy standards, the PHA or IHA pays the landlord a monthly stipend, or a portion of the rent. For certificates, the stipend covers the difference between the family's contribution, as determined by program rules, and the actual rent. Rents cannot exceed the Fair Market Rent level (FMR), as determined by HUD for each market area.

Under the Section 8 housing voucher program, in contrast to the certificate program, households may choose to rent units either below or above the FMR, by paying extra rent if the rent exceeds the FMR or benefitting from the savings if the rent is less than FMR.

The portability provisions of Section 8 vouchers and certificates permit use of the subsidy in jurisdictions other than that in which the IHA (or PHA) providing the subsidy is located. In the case of vouchers, such assistance is portable nationally; with certificates, the subsidy is now portable statewide or within the metropolitan area in which the PHA/IHA is located.

However, portability provisions may not provide any real opportunity if the small towns or outlying areas just outside reservations are not served by any PHA. Partly for this reason, permission has been given to IHAs to dispense vouchers or certificates in these instances without going through the portability provisions; the IHA simply

administers the voucher as if the voucher recipient were within its geographic jurisdiction. This means American Indian/Alaska Native households living on reservations or in Alaska villages who receive a Section 8 voucher or certificate need not be limited to reservations or villages in their search for housing. Thus, households that receive vouchers or certificates from IHAs can find housing:

1. On reservations;
2. Off reservations, in adjacent areas served by the IHA;
3. Off reservations in an area covered by a local or state-wide PHA, using the portability provisions.

According to OIP staff, the Section 8 vouchers administered by IHAs are being used both on and off reservations. This indicates that, for at least those IHAs, sufficient rental stock exists on or nearby reservations to make the program workable. At the same time, American Indians/Alaska Natives living off reservations and Alaska Native villages--for example, in urban areas--are able to move on or near to reservations or Alaska Native villages if they have vouchers or certificates from PHAs where they presently live.

#### Section 8 Use By IHAs Prior to 1991

Until recently, there was almost no use of the Section 8 voucher and certificate program by IHAs, and that use which did occur was predominately by Oklahoma IHAs. Not until 1986, when the Cherokee Nation received 220 certificates, did an IHA make use of the program, and another seven years elapsed before the next IHA became involved in the program.

Since IHAs were not extensively using the program, HUD established a special set-aside of 500 voucher units in 1988 for use by IHAs. As a result, eleven IHAs received 500 units that year. This special set-aside, plus subsequent expanded use of the program by the Oklahoma IHAs, comprise the bulk of IHA usage of the program, as shown in Table 1.

Oklahoma clearly predominates, accounting for 2,266 of the 2,819 (or 80 percent) Section 8 voucher and certificate units currently in use. The explanation for the disproportionate concentration is that the Oklahoma IHAs initially operated like other PHAs, were introduced to the program early on, trained in its use, and are very familiar with the program. Also, as large housing authorities with a sizeable staff, they have a capability often lacking in small IHAs.

According to OIP officials, it appears that over half the Section 8 units in Oklahoma, where IHAs serve both American Indians and those who are not American Indians, go to those who are not American Indians. If this is the case, it means that only approximately 1,700 American Indian/Alaska Native households rather than 2,900 American Indian/Alaska Native households are receiving vouchers nationally.

Table 1

IHAS USING SECTION 8 VOUCHERS AND CERTIFICATES  
(pre-1991 Allocation)

<u>STATE</u>	<u>IHA NAME</u>	<u>NO. CERT</u>	<u>NO. VOUCHERS</u>
Alaska	Kodiak Island Housing Authority		50
Arizona	Navajo Housing Authority		50
Minnesota	White Earth Housing Authority		25
Montana	Blackfeet		70
	Salish & Kootenai		50
North Carolina	Qualla Housing Authority		70
Nevada	Pyramid Lake Housing Auth.		50
Oklahoma	Cherokee Nation IHA	809	126
	Chickasaw Nation IHA	685	143
	Choctaw Nation IHA	313	86
	Seminole IHA	24	50
	Seneca-Cayuga IHA	20	
	Delaware IHA	10	
Washing- ton	Cascade Inter Tribal		138
Wisconsin	Menominee Tribal IHA		25
TOTAL		<u>1,861</u>	<u>958</u>



## The 1991 Section 8 Selection Process and Results

In 1991, HUD modified its procedures for allocating Section 8 vouchers and certificates. The Notice of Funds Availability (NOFA) for that year specifically indicated that IHAs, along with PHAs, were eligible applicants whereas previous NOFAs remained silent on this issue. In addition, new HUD instructions specified for the first time certain roles for OIP staff in the review of Section 8 voucher applications received from IHAs.

Following the OIP ranking process, completed applications were forwarded to the respective Field Offices where final selections were made. The results of the 1991 competitive process for IHAs are shown in the following table:

Table 2

SECTION 8 UNITS SOUGHT AND RECEIVED BY IHAs FY 1991  
BY HUD REGIONS

<u>OIP Region</u> <u>Units</u>	<u>INDIAN HOUSING AUTHORITIES</u>			
	<u>APPLICANTS</u>		<u>RECIPIENTS</u>	
	No. IHAs	No. Units Requested	No. IHAs	No.
Chicago	3	100	1	38
Oklahoma	1	25	0	0
Denver	3	125	1	21
Phoenix	1	50	1	9
Seattle	1	50	0	0
Anchorage	0	0	0	0
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TOTAL	9	350	3	68

The table shows that only nine of 183 IHAs applied for a total of 350 Section 8 units. Of these IHAs, three then received commitments for 68 vouchers.

HUD OIP Directors were asked to offer their explanations for the low level of applications. Their explanations touched on a variety of issues, including the possibility that:

- Some IHAs were handicapped by the scarcity of privately owned rental units in their jurisdictions.
- The administrative fees generated from the award of a small number of vouchers might be too low to support the new IHA staff needed to effectively administer the program.
- Many IHAs are still not aware of the program, or not familiar enough with it to apply for units.
- The enlarged responsibilities for OIP Offices under new Section 8 administrative rules were not accompanied by additional training or staffing allocations, and therefore OIP staff were not as conversant with the program as "regular" Field Office staff;
- Some IHAs felt that they might "lose" funds for new construction programs if they applied for Section 8 vouchers.

This listing of potential barriers to the use of Section 8 vouchers was restated by many of the organizations and individuals consulted during the course of this research project.

#### V. BARRIERS TO GREATER USE OF SECTION 8 VOUCHERS

Based on interviews with a small purposive sample of IHA representatives and key HUD OIP staff, as well as other data, a number of problems emerged to explain the apparent low level of use of Section 8 by IHAs. The following assessment is limited by the methodological features described earlier. In particular, it is not possible to provide careful, quantitative assessments of the degree of significance of each of the factors identified below. The barriers discussed were nonetheless of considerable salience to all of our informants.

The clearest area of consensus is that the Section 8 program has limited value for some IHAs because of the lack of privately owned rental housing stock on or near the reservations. Other explanations relate to the administrative structure used for implementing the Section 8 Program. The final set of reasons involve social or cultural constraints.

These issues are examined in more detail below beginning with the central issue of the availability of rental housing.

### Rental Housing--Demand and Availability

As indicated earlier, approximately one-third of American Indian households on reservations are currently renters. According to the 1990 Census, there are 75,000 rental units on reservations and Trust lands, of which about 28,000 are already federally subsidized. The population most likely to use vouchers would be those income eligible households in the 47,000 rental units not federally assisted. The eligible population is potentially further expanded by the fact that 19 percent of all the rental units are overcrowded (since the unsubsidized units are presumably more "crowded" than the subsidized units, the proportion of crowded unsubsidized units is probably greater than 19 percent).

In addition, while most households typically do not move from homeownership to rental tenure, a number of American Indian/Alaska Native homeowners own units which are overcrowded, severely substandard or poorly located, and a number of these households might also be eligible for vouchers.

However, the critical question regarding the feasibility of increased use of Section 8 vouchers by IHAs has to do with the supply of rental housing: are there privately owned units available, either on or off reservations, which could be used by American Indian households if they had vouchers in hand?

It is difficult to provide a comprehensive and reliable answer to this question. As indicated above, it appears that about 47,000 of the 75,000 rental units on reservations are privately owned. Many or most of the renters occupying these units might benefit from vouchers by having their rent burden reduced or by having their units repaired to meet the Section 8 Housing Quality Standards.

Regarding availability, the 1990 Census indicates that 8.9 percent of rental units on reservations and Trust lands are vacant. This information about potentially available units does not however indicate whether such units would meet the Section 8 Housing Quality Standards. It is also unclear how many substandard units might be repaired to meet the Section 8 Quality Standards if vouchers were being used.

On some reservations, it appears that mobile homes are a significant factor in the use of vouchers. Data shown in the appendices indicate that renter-occupied mobile homes constitute

30 percent of the total occupied stock on the Akwesasne reservation in New York and 22 percent on the Qualla reservation in North Carolina. However, 1990 Census information indicates that there are much lower levels of availability of mobile homes in other reservations.

In addition to the potential availability of rental mobile homes, it is clear that proximity to nearby private rental housing markets enhances the feasibility of use of IHA-issued vouchers. There are moderate to sizeable distances from large reservations to the nearest cities or metropolitan areas. Perhaps more pertinent, there are a number of small cities and towns in fairly close proximity to most of the reservations, and these may provide some level of rental housing.

However, as discussed below, the use of vouchers and certificates outside reservations or Alaska Native villages may be limited both by the reluctance of many American Indian/Alaska Native households to live in such environments and by the reluctance of some landlords to rent to American Indians/Alaska Natives.

Given the limitations of the data, it is not possible to quantify either the demand for vouchers or the availability of units with any precision. The availability of units varies greatly by the type of reservation; isolated reservations in the Great Plains and the Southwest are particularly hampered by a paucity of off-reservation rental units. For these reservations, the housing options available will continue to involve on-reservation housing, and much of that housing will involve new or rehabilitated units receiving federal subsidies to replace seriously substandard housing now in use.

Since much of the desired data are unavailable, all six OIP Directors were asked to assess whether the program could work for the IHAs in their Regions. In addition several national experts were asked their opinions on this matter.

The general reaction of four of the six OIP Directors (all but the Oklahoma and Chicago Directors) was that sufficient housing does not exist on most IHA reservations to make the program practical. Comments were typified by that of the Seattle Director, who said "it is understood by most people who work in Indian housing programs that the voucher program needs existing housing stock and, on most reservations, this does not exist."

Nonetheless, the OIP Directors offered the following (Table 3) estimates of the number of IHAs which could effectively use the program in their region and which had sufficient rental units available:

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Table 3

OIP ESTIMATES OF POTENTIAL USE OF SECTION 8 VOUCHERS

<u>OIP Regional Office</u>	<u>Estimated Number of IHAs Able to Use Section 8 Vouchers</u>
Chicago	30
Oklahoma	6
Denver	11
Phoenix	15
Seattle	14
Anchorage	4
	-----
Total	80

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Whether there actually are 80 IHAs that might be interested in operating the program, or whether they could use sufficient vouchers to make the program administratively workable, are matters discussed below. The potential for the program to work in environments other than those of the present 16 IHAs, nonetheless, does appear to exist, partly due to the flexibility provided through the Section 8 portability provisions. Portability contains administrative complexities, particularly if the arrangement involves fee-splitting; nevertheless, it opens doors for those seeking housing in areas outside the IHA's jurisdiction.

The two national American Indian/Alaska Native organizations which were consulted about the feasibility of increased use of Section 8 provided the same general reaction as that of the OIP Directors: that vouchers would not be appropriate for many IHAs but could work in far more instances than they are now.

Administrative/Information Barriers

There are a number of administrative or management concerns which affect the feasibility of increased use of Section 8 vouchers by IHAs. Some of these relate to IHA administrative provisions and others to HUD operations.

As discussed earlier, both the OIH and the six OIP Offices have had limited involvement with the voucher program to date. Instead, their attention has been focused almost entirely on the administration of the Rental Housing and Mutual Help housing programs administered by OIH. By contrast, the Section 8 program is administered through the regular HUD Field Office structure, through the Housing Development and Housing Management Divisions, which perform technical assistance, program implementation and application review, and monitor housing authorities using Section 8. It appears that one result of this bifurcated administrative system is that IHAs have had relatively little exposure to the Section 8 voucher program.

Several comments made by IHA Executive Directors contacted for this study indicate that many IHA Directors were not aware of the Section 8 program before either the 1988 Set-Aside or the 1991 NOFA. One IHA Director indicated that it was the 1988 Set-Aside which led to his IHA's first experience with Section 8. Three Directors whose IHAs applied in 1991 indicated they had not applied before because they had not heard of the program.

OIP Directors and most IHA Directors believe that IHAs, because of their relative lack of experience with Section 8, are not in a position to successfully compete in the present HUD administrative framework. Administrative problems identified were: (1) lack of timely receipt of information and materials by IHAs; (2) inadequate training and staffing for OIH/OIPs; and, (3) lack of guidance to IHAs on the administration of the Section 8 voucher program. One IHA Director commented that "a lot of IHAs do not understand the program and are just not sure of it; informing them would be helpful."

For some IHAs which are aware of the voucher program, another administrative obstacle was raised, namely, the level of effort needed to run the program. Frequent mention was made of a rule of thumb used by administrators that a minimum of 50 vouchers are needed to support one additional staff person within the PHA or IHA to operate the program. The administrative fee provided PHAs and IHAs to carry out the program (now set at 8.2 percent of the two-bedroom Fair Market Rent) is believed by some to be insufficient to cover the cost of such staff person and related costs.

One OIP Director stated that: "The limited administrative fee permitted makes this program a loser for almost all our IHAs." Similarly, an Eastern IHA Director with a fair amount of experience with Section 8 noted that: "We were told it was not feasible or profitable for IHAs unless they have 100 or more



units due to the training that is involved and because the fee is so low." Of the nine IHAs interviewed, the majority stated they could use only about 10 vouchers.

It should be noted that the problem of inadequate fees relates more to the general issue of program size than it does to whether the program sponsor is an IHA. Small PHAs, or PHAs in remote areas where housing stock is dispersed, are also hampered by their size or housing environment.

Other IHAs, however, believe that this is a problem that can be overcome. One Eastern OIP Director responded that: "Low administrative fees will always be a problem but, given the opportunity, our IHAs will process Section 8 units."

Another administrative issue of concern was identified by both OIP Directors and national experts who noted that some IHAs suffer from a high levels of turnover of key IHA staff, resulting from their selection by rotating tribal officials. This turnover negatively impacts the IHA's ability to compete for new programs such as vouchers. No estimates are available as to the precise number of IHAs which experience these turnover problems.

### Social - Cultural Barriers

There are an additional set of barriers or constraints which were identified during the course of this research and which appear to have varying degrees of impact on select IHAs. These factors are listed in their approximate order of significance as identified by those interviewed.

#### 1. Preference for Ownership

According to a number of OIP and IHA Directors, American Indians/Alaska Natives have a strong preference for homeownership that in some instances limits the appeal of vouchers. Eight of the nine IHAs contacted referred to this ownership preference as one reason for the apparent underuse of Section 8 vouchers. One Midwestern IHA, for example, reported that: "Since most people would prefer ownership, we have not applied for anything but Mutual Help. Turnover is high in the rental program; we have not had much success with it."

#### 2. Belief that Vouchers May Decrease Number of New Construction Units

Discussions with IHA officials and with national American Indian/Alaska Native organizations make it clear that many IHAs feel that support for vouchers may result in the loss of Federal funding for new construction units. Although there is no evidence that this has occurred, there continues to be an expectation by many IHAs that there exists a quid-pro-quo which

will cost them new construction units if they seek vouchers.

### **3. Landlords Unwillingness to Participate/Discrimination**

There are believed to be two factors that discourage landlord interest; (1) Section 8 paperwork and FMR levels and (2) racial/ethnic biases and discrimination.

Some landlords have problems with FMRs. One OIP Director believes that the year-long period between HUD adjustments in FMR levels has caused landlords to be disinterested in the program. Another believes FMRs to be too low and, as a result, discouraging. (It should be noted that, several Directors also felt the FMRs were very high for their regions, although this did not impede use of the program.)

IHAS also cited as a significant factor the unwillingness of some landlords to rent to American Indians/Alaska Natives. National American Indian/Alaska Native housing organizations confirmed that the problem exists, but they could provide no clear estimates of its severity or prevalence. American Indians/Alaska Natives filed 172 complaints of housing discrimination at HUD and other fair housing enforcement agencies during the period from March 1989 through September 30, 1991.

### **4. Outmigration Induced by Portability**

There are conflicting views on how the Section 8 portability provisions affect voucher use by IHAs. At least two IHA administrators viewed portability positively. In their view, it facilitated the provision of housing where it is otherwise unavailable by enabling household members to work outside the reservation or look for housing near where they work. One OIP Director indicated that: "It provides an opportunity to house poor and disadvantaged Indian families in suitable rental stock either nearby their home reservation or in close proximity to their employment." Another Director views it as a "plus with many of our IHAs since it provides an opportunity for many tribal members to come back to the reservation or at least near the reservation."

Conflicting opinions were also expressed. Two OIP Directors cited the displeasure of tribal leaders at having members leave the reservation. One national housing leader consulted, however, did not believe that IHAs would try to block families from moving off the reservations.

## 5. Lack of American Indian/Alaska Native Preference

Several sources indicated that the lack of American Indian/Alaska Native preference in the allocation of vouchers limits acceptance and use of the Section 8 program by some IHAs. With some housing programs, particularly the Mutual Help program, it is possible to target American Indians/Alaska Natives as the primary program participants. This is not the case with Section 8. One OIP Director reported: "The Section 8 voucher program could be made more effective for IHAs if they could limit, or at least give a preference, to Indians. As it stands now, most Indian vouchers' go to non-Indians in Oklahoma." Two IHA administrators cited the lack of American Indian/Alaska Native preference as a problem among their tribal leaders who sometimes discouraged support of the program because of the lack of clear preference or an American Indians/Alaska Natives-only policy.

## APPENDIX A

### PROFILES OF IHAS USE OF SECTION 8 VOUCHERS

This appendix describes Section 8 use by three of the sixteen IHAs who currently use either vouchers or certificates. The three IHAs are: Qualla, Cascade Inter-Tribal, and Cherokee Nation.

All three IHAs have certain similar characteristics including: 1) existing private stock of rental housing; 2) knowledge of the Section 8 program and how it can be applied to their area; and, 3) IHA and tribal leadership willing to participate in Section 8 even if it means some members will not live on tribal lands.

#### Qualla IHA

Situated in the Great Smoky Mountains on the Eastern Cherokee tribal boundary in Swain County, North Carolina, the Qualla IHA serves, in addition to Swain, the counties of Jackson, Graham, and Cherokee. The nearest small towns are Sylva 15 miles to its southeast, and Bryson City 10 miles west. The IHA service area has a population of 6,527, of which 5,388 (83%) are American Indian; in addition to the Eastern Cherokee Tribe (the major one residing in the area), it also includes Navajo, Comanche, Sioux and Cheyenne, to name a few. The major industry is tourism, which may account for the fact that 15% of the IHA service area population is not American Indian. Of its 2,370 housing units at least half are mobile homes.

Created in 1968, the Qualla IHA's experience with Section 8 began with the FY 1988 HUD funding for 50 vouchers followed by an additional 25 vouchers in 1989. While applications for Section 8 submitted in 1990 and 1991 were not successful, Qualla Housing considers itself an experienced operator, with its 75 vouchers administered by a staff of two. Qualla has also provided application assistance to other IHAs submitting applications to the Section 8 program.

IHA officials believe they have a good relationship with neighboring PHAs, which facilitates the informal cross movement of voucher recipients. Because it has dealt primarily with the Office of Indian Programs in the application and administration of the Section 8 program, it is largely unfamiliar with the "regular" HUD Field Office staff.

Although the American Indian population appears to generally prefer homeownership programs, the extent of crowding and poverty among this population leads IHA officials to estimate that up to 600 families on the Qualla IHA waiting list of 1,043 could use Section 8 vouchers.

#### **Cascade Intertribal IHA**

Located in rural Skagit County, Washington, and serving, in addition to Skagit, the rural counties of Whatcom and Snohomish, the Cascade Intertribal IHA is approximately 60 miles from the closest urbanized area from which the bulk of its available Section 8 housing is drawn. This reservation-based IHA serves three reservations comprising the major tribes of Sauk Suiattle, Stillaguamish and Upper Skagit, in addition to members from several other tribes. In addition, 10 percent of its service area population is not American Indian. The major industries of the area are lumbering, pulp milling, and fish packing; many of its residents are employed by the tribe on the reservation.

The IHA has a reservation population of 100 households, all of whom are participants in the Mutual Help program. While most of the American Indian population would prefer homeownership, there are some families for whom vouchers are appropriate, and they are largely families desiring to live off the reservation or closer to where they work.

The IHA's experience with the Section 8 program began around the time of its formation in 1988 with the HUD set-aside for American Indians. Its 140 vouchers, all of which are used to rent housing outside of the reservation, are administered by a staff of one. Five of the 140 Section 8 units are mobile homes.

While there is no problem with the availability of suitable housing, there have been problems in two of the three counties served, Skagit and Whatcom, where many landlords have been unwilling to participate because of what they feel is a negative experience with the program under local PHAs.

The IHA, however, relies on its excellent relationship with neighboring PHAs and credits this good standing in the local housing authority community with the success of its Section 8 program. It is the only IHA in the Seattle OIP Region using the Section 8 program. Of the 307 families on the IHA's waiting list, 260 desire the Section 8 program. The remaining 47 households are waiting for Mutual Help units, as the IHA does not have rental units available.

#### **Cherokee Nation IHA**

Seventy miles from Tulsa, in rural Cherokee county, is the Cherokee Nation IHA. This IHA serves 14 northeastern Oklahoma counties and one major tribe, the Cherokee, plus several others.

It is a non-reservation based IHA, meaning that in the development of OIH units it cannot rely on reservation lands, because there are none, or on tribal lands because there is little. Instead, the IHA relies primarily on development through the fee-simple method (where the developer makes a purchase from a seller) or through individual donations or leases. (This is in contrast to what takes place with reservation-based IHAs, where the land is largely owned by the tribe and leased to the IHA for development for a term of 50 years; tribes do not usually donate land, but are not prohibited from doing so if they deem it necessary.)

Created in 1966, the Cherokee Nation IHA is one of the IHAs most familiar with the Section 8 program. Its experience with the Section 8 program began around 1976 with the certificate program, and today it is the largest IHA participant in the Section 8 program. Its 809 certificates and 150 vouchers are administered by a staff of nine. It estimates that it could use an additional 1,133 units (mostly two and three bedroom units), which is 44 percent of its total housing need. At least 50 percent of the population in its service area has a poverty rate of 20 percent or more.

Most of the housing available for the Section 8 program is not on tribal lands, but is in the smaller surrounding communities. Only about 10% or less of its available stock are mobile homes units.

The Cherokee Nation IHA operates under an Oklahoma state statute, causing it to function to some degree as a public housing authority, particularly with its Section 8 and rental programs. Both of these programs are available to income-eligible households which are not American Indian. Twenty-five percent of its service area population is not American Indian. The Mutual Help program, however, is exclusively for American Indian use.

Due to the nature and extent of its experience with the Section 8 program, this IHA is as experienced in dealing with the "regular" HUD Field Office as with the OIP. Since its service area overlaps that of local PHAs, it has developed cooperative relations with them, further facilitating development of its Section 8 program.



## **APPENDIX B**

### **AMERICAN INDIAN/ALASKA NATIVE HOUSING CHARACTERISTICS**

Derived from 1980 & 1990 U.S. Decennial Census data, the 1990 Bureau of Indian Affairs' "Consolidated Housing Inventory", and 1991 HUD Assisted Housing Data

**TABLE 1**  
**SIZE AND GROWTH OF THE AMERICAN INDIAN, ESKIMO, AND ALEUTIAN NATIVE**  
**(AMERICAN INDIAN/ALASKA NATIVE) POPULATION: 1980-1990 CENSUS DATA<sup>1</sup>**  
=====

	1980	1990	1980-1990 %change
Population	1,478,523	1,959,234	33*
Households	443,609	591,372	33**
Owner-Occupied	233,090	318,001	36
Renter-Occupied	210,519	273,371	30
Number of American Indians on Reservations and Trust Lands	365,468	437,357	20
Percent of American Indians on Reservations and Trust Lands	26%	22%	-4
Number of American Indians on OK Tribal Jurisdiction Lands	116,185	200,789	73
Number of Alaska Natives in Alaska Native Villages	39,463	47,244	20

\* The total U.S. population grew 9.8 percent between 1980 and 1990. (Some of the growth in American Indian/Alaska Native population could be due to more individuals self-reporting themselves as American Indians/Alaska Natives). In addition, the Census Bureau estimated in 1990 that the American Indian/Alaska Native population grew 19% between 1980 and 1988 compared to 6% for whites.<sup>2</sup>

\*\* Nationally, the total number of all households grew by 14.4 percent from 1980 to 1990.

**TABLE 2**  
**HOUSING DATA FOR AMERICAN INDIAN RESERVATIONS AND**  
**TRUST LANDS: 1990 CENSUS**

	<u>Total Pop.</u>	<u>American Indian Population</u>	<u>Percent American Indian</u>
Total Persons	807,816	437,357	54
Total Owner-Occ. units	174,823	75,552	43
Vacant Units for sale	3,511		
Homeowner vacancy rate	2.0%		
Total Renter-Occ.	75,241	36,661	49
Vacant Units for Rent	7,364		
Rental Vacancy Rate	8.9%		

**TABLE 3**  
**CROWDING (Persons per room greater than 1.01) ON AMERICAN**  
**INDIAN RESERVATIONS AND TRUST LANDS: 1990 CENSUS**

	<u>Total</u>	<u>Number Crowded</u>	<u>Percent Crowded</u>
Owner-Occ. Units	174,823	29,235	17
Renter-Occ. Units	75,241	14,365	19

**TABLE 4**  
**NATIONAL AMERICAN INDIAN/ALASKA NATIVE**  
**INCOME DATA FOR 1979: 1980 CENSUS**

	<u>American Indian/ Alaska Native</u>	<u>Total Population</u>
Median Household income	\$12,227	\$16,841
% families below poverty line	23.7	9.6
% urban	54.6	73.7
% rural	45.4	26.3

**TABLE 5**  
**INCOME DATA FOR AMERICAN INDIANS LIVING ON RESERVATIONS IN 1979:**  
**1980 CENSUS**

	<u>Households</u>	<u>Families</u>
Median income	\$9,116	\$9,924
% Below poverty line	43.0	40.9
% Earning less than \$5,000	31.0	N.A.

**TABLE 6**  
**HOUSING QUALITY FOR AMERICAN INDIAN OCCUPIED UNITS**  
**ON RESERVATIONS: 1980 CENSUS**

	<u>Percent</u>
Built 1939 or before:	12.0
Built 1949 or before:	31.6
Lacking complete plumbing:	24.1
Without piped water:	21.0
With out-house or privy:	20.8
Without central heating:	53.9
Without electric lighting:	15.9
With no refrigerator:	16.6
With no phone in unit:	55.8
With greater than 1.01 persons per unit:	38.8

**TABLE 7**  
**HOUSING NEED OF AMERICAN INDIAN/ALASKA NATIVES TRIBES/AGENCY/AREA**  
**ACCORDING TO THE BUREAU OF INDIAN AFFAIRS: 1990**

**CONSOLIDATED HOUSING INVENTORY**  
**FISCAL YEAR 1990**

TRIBE/AGENCY/AREA	TOTAL NUMBER EXISTING HOUSING UNITS	HOUSING UNITS IN STANDARD CONDITION	HOUSING UNITS IN SUBSTANDARD CONDITION	HOUSING UNITS IN RENOVATION	HOUSING UNITS REPLACEMENT	FAMILIES NEEDING HOUSING	TOTAL NEW HOUSING UNITS REQUIRED
ABERDEEN	14,818	9,779	5,039	3,158	1,881	2,896	4,777
ALBUQUERQUE	11,658	6,672	4,986	4,285	701	1,769	2,470
ANADARKO	4,554	3,450	1,104	1,000	104	2,041	2,145
BILLINGS	8,018	5,615	2,403	1,420	983	1,797	2,780
EASTERN	7,766	4,655	3,111	1,798	1,313	3,094	4,407
JUNEAU	14,124	9,042	5,082	3,618	1,464	4,009	5,473
MINNEAPOLIS	11,180	7,315	3,865	2,360	1,505	2,291	3,796
MUSKOGEE	26,592	21,086	5,506	4,077	1,429	4,689	6,118
NAVAJO	27,201	13,998	13,203	9,375	3,828	5,650	9,478
PHOENIX	14,940	11,200	3,740	2,693	1,047	1,284	2,331
PORTLAND	13,462	9,106	4,356	3,221	1,135	2,644	3,779
SACRAMENTO	3,791	1,566	2,225	1,771	454	1,905	2,359
<b>TOTALS</b>	<b>158,104</b>	<b>103,484</b>	<b>54,620</b>	<b>38,776</b>	<b>15,844</b>	<b>34,069</b>	<b>49,913</b>
<b>FY1989 TOTALS=</b>	<b>155,539</b>	<b>100,037</b>	<b>55,502</b>	<b>39,516</b>	<b>15,986</b>	<b>35,886</b>	<b>51,872</b>
<b>VARIANCE =</b>	<b>+ 2,565</b>	<b>+ 3,447</b>	<b>- 882</b>	<b>- 740</b>	<b>- 142</b>	<b>-1,817</b>	<b>-1,959</b>

**TABLE 8**  
**HOUSING NEED OF THE TEN LARGEST RESERVATIONS AND TRUST LANDS**  
**ACCORDING TO THE BUREAU OF INDIAN AFFAIRS: 1990<sup>3</sup>**

TRIBE/AGENCY/AREA	TOTAL NUMBER EXISTING HOUSING UNITS	HOUSING UNITS IN SUBSTANDARD CONDITION	HOUSING UNITS IN RENOVATION	HOUSING UNITS NEEDING REPLACEMENT	FAMILIES NEEDING HOUSING	TOTAL NEW HOUSING UNITS REQUIRED	
Navajo	27201	13998	13203	9375	3828	5650	9478
Pine Ridge	2712	1418	1294	660	634	1278	1912
Fort Apache							
Gila River	1575	1140	435	178	257	180	437
Papago							
Rosebud	1625	714	911	605	306	651	957
San Carlos	1379	1014	365	337	28	146	174
Zuni	1568	800	768	709	59	193	252
Hopi	1536	692	844	691	153	20	173
Blackfeet	2239	1591	648	263	385	93	478



**TABLE 9**  
**POPULATION AND CROWDING CHARACTERISTICS OF THE TEN LARGEST**  
**AMERICAN INDIAN RESERVATIONS AND TRUST LANDS: 1990 CENSUS**  
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	Total Persons	Total American Indians	Percent American Indians
Navajo, NM, UT, AZ	148451	143405	96.6
Pine Ridge, SD	12215	11182	91.5
Fort Apache, AZ	10394	9825	94.5
Gila River, AZ	9540	9116	95.6
Papago, AZ	8730	8480	97.1
Rosebud, SD	9696	8043	83.0
San Carlos, AZ	7294	7110	97.5
Zuni, NM	7405	7073	95.5
Hopi, AZ	7360	7061	95.9
Blackfeet, MT	8549	7025	82.2
	=====	=====	=====
TOTAL	229364	218320	95.2

	Owner* Occupied Crowded	% Owner Occupied Crowded	Renter* Occupied Crowded	% Renter Occupied Crowded
Navajo**	15187	53.3	3738	41.4
Pine Ridge	468	36.5	668	45.8
Fort Apache	673	40.4	312	38.4
Gila River	580	35.7	303	37.7
Papago	670	42.4	237	39.2
Rosebud	256	21.5	353	26.1
San Carlos	476	42.7	227	38.5
Zuni	349	29.3	81	17.8
Hopi	606	43.3	166	35.6
Blackfeet	176	14.2	224	20.4
	=====	=====	=====	=====
TOTAL	19441	47.7	6309	37.9

\*Note that these numbers are from the total population living on the Reservation/Trust Lands. However, since the ten largest Reservations/Trust Lands are mostly inhabited by American Indians, the crowding rates are generally indicative of housing conditions of American Indians.

\*\*Navajos have traditionally lived in one room Hogans.

**TABLE 10**  
**MOBILE HOME/TRAILER OCCUPANCY AND DISTANCE TO MODERATE/LARGE SIZE**  
**CITIES FOR TEN LARGEST AMERICAN INDIAN**  
**RESERVATIONS AND TRUST LANDS:1990 CENSUS**

	Owner-Occ. Mobile Home/ Trailer (%)	Renter-Occ. Mobile Home/ Trailer (%)	Distance to nearest city (miles) <sup>4</sup>
Navajo	19	12	20 - Flagstaff
Pine Ridge	31	13	40 - Rapid City
Fort Apache	8	5	70 - Phoenix
Gila River	17	7	0 - Phoenix
Papago	5	6	30 - Tucson
Rosebud	17	9	20 - Valentine
San Carlos	10	3	50 - Phoenix
Zuni	13	16	20 - Gallup
Hopi	12	14	40 - Flagstaff
Blackfeet	25	9	80 - Great Falls

**TABLE 11**  
**MEDIAN INCOME AND SELECTED HOUSING QUALITY MEASURES FOR AMERICAN**  
**INDIANS ON THE TEN LARGEST RESERVATIONS: 1980 CENSUS<sup>5</sup>**

	Household Median Income	Households Earning less than \$5,000 (SE)	Percent W/O Piped Water (SE)	Percent W/O elec. light (SE)
Navajo	\$7569	8511 (42)	50.6 (.19)	45.8 (.19)
Pine Ridge	\$7571	821 (31)	24.8 (1.2)	8.0 (.80)
Fort Apache	\$8183	558 (9)	12.6 (.46)	9.9 (.42)
Gila River	\$7373	610 (14)	11.2 (.56)	6.1 (.43)
Papago	\$6407	647 (14)	41.2 (.90)	22.2 (.76)
Rosebud	\$8271	451 (13)	6.9 (.49)	2.5 (.30)
San Carlos	\$6988	491 (8)	22.2 (.64)	5.9 (.36)
Zuni	\$10149	251 (7)	5.5 (.37)	2.5 (.25)
Hopi	\$7160	594 (14)	58.1 (.92)	47.1 (.93)
Blackfeet	\$9963	416 (23)	3.9 (.69)	0.6 (.28)

**TABLE 12**  
**POPULATION CHARACTERISTICS OF AMERICAN INDIAN**  
**RESERVATIONS AND TRUST LANDS**  
**CURRENTLY RECEIVING VOUCHERS: 1990 CENSUS<sup>6</sup>**

	<u>Total Pop.</u>	<u>American Indian Pop.</u>	<u>Total Housing units</u>	<u>Occupied units</u>
Navajo, AZ,NM,UT	148,451	143,405	55,467	36,250
White Earth, MN	8,727	2,759	4,610	1,794
Salish & Kootenai, MT	21,259	5,130	10,399	7,874
Blackfeet, MT	8,549	7,025	3,004	2,333
Qualla, NC	6,527	5,388	2,370	2,104
Pyramid Lake, NV	1,388	959	580	504
Menominee, WI	3,397	3,182	1,176	901
Akwesasne, NY	1,978	1,923	754	634

**TABLE 13**  
**INCOME CHARACTERISTICS OF AMERICAN INDIANS ON RESERVATIONS' WHICH**  
**CURRENTLY RECEIVE VOUCHERS: 1980 CENSUS<sup>7</sup>**

	<u>Median Income</u>	<u># HH earning less than \$5,000 (SE)</u>
Navajo, AZ,NM,UT	\$7569	8511 (42)
White Earth, MN	\$9715	158 (20)
Salish & Kootenai, MT	\$10459	314 (3)
Blackfeet, MT	\$9963	416 (23)
Qualla, NC	\$8893	358 (8)
Pyramid Lake, NV	\$11179	44 (6)
Menominee, WI	\$12476	69 (6)
Akwesasne, NY	\$9485	160 (14)

**TABLE 14**  
**HOUSING CHARACTERISTICS OF AMERICAN INDIAN RESERVATIONS AND TRUST**  
**LANDS CURRENTLY RECEIVING VOUCHERS: 1990 CENSUS**

	American Indian Owner- occupied	American Indian Renter occupied	American Indian Mean Cont. Rent	American Indian Rental Vac. Rate(%)
Navajo, AZ,NM,UT	26,679	7,407	143	8.7
White Earth, MN	217	126	98	8.7
Salish & Kootenai, MT	1,045	687	144	10.4
Blackfeet, MT	969	903	113	5.9
Qualla, NC	1,445	341	114	15.4
Pyramid Lake, NV	193	113	146	33.3
Menominee, WI	475	349	120	5.3
Akwesasne, NY	561	64	184	7.0

  

	Owner- Occupied Crowded	% Owner- Occupied Crowded	Renter Occupied Crowded	% Renter Occupied Crowded
Navajo	15,187	53.3	3,738	41.4
White Earth	105	4.5	74	11.4
Salish & Kootenai	213	3.9	143	6.0
Blackfeet	176	14.2	224	20.4
Qualla	123	7.5	45	9.5
Pyramid Lake	25	7.4	24	14.3
Menonminee	81	15.0	63	17.5
Akwesasne	40	7.0	8	12.1

**TABLE 15**  
**MOBILE HOME/TRAILER OCCUPANCY AND DISTANCE TO MODERATE/LARGE SIZE**  
**CITIES FOR RESERVATIONS AND TRUST LANDS CURRENTLY RECEIVING**  
**VOUCHERS: 1990 CENSUS**

	<u>Owner-Occ.</u> <u>Mobile Home/</u> <u>Trailer (%)</u>	<u>Renter-Occ.</u> <u>Mobile Home</u> <u>Trailer (%)</u>	<u>Distance</u> <u>to nearest</u> <u>city (miles)<sup>8</sup></u>
Navajo	19	12	20 - Flagstaff, AZ
White Earth	13	8	40 - Fargo, ND
Salish & Kootenai	19	13	30 - Missoula, MT
Blackfeet	25	9	80 - Great Falls, MT
Qualla	12	22	35 - Asheville, NC
Pyramid Lake	35	11	40 - Reno-Sparks, NV
Menominee	24	8	7 - Shawano, WI
Akwesasne	18	30	4 - Cornwall, ONT

**TABLE 16**  
**NUMBER OF IHA LOW RENT UNITS IN MANAGEMENT FOR AMERICAN INDIAN**  
**RESERVATIONS AND ALASKA NATIVE VILLIAGES CURRENTLY RECEIVING**  
**VOUCHERS: 1991 HUD ASSISTED HOUSING DATA**

	<u>Number</u> <u>of low</u> <u>rent units</u> <u>in mgmt.</u> <u>by IHA</u>
Navajo, AZ, NM, UT	2840
White Earth, MN	203
Salish & Kootenai, MT	397
Blackfeet, MT	544
Qualla, NC	127
Pyramid Lake, NV	75
Menominee, WI	159
Akwesasne, NY	10
Nationally, on Reservations and Trust Lands	21,670
Nationally, including Oklahoma and Alaska	24,773 (2,302 in development)

**ENDNOTES:**

1. Based on 1980 and 1990 Decennial Census data.
2. "American Indian, Eskimo, or Aleut Population has grown by 18 percent since 1980, Census Bureau reports." U.S. Department of Commerce News. Bureau of the Census, report number CB90-IN.01, Washington, D.C. (March 2, 1990).
3. Bureau of Indian Affairs (BIA) estimates of need are based on tribal leaders' reports while Census data are based on self-reporting. Individuals who identify themselves as American Indian, Eskimo or Aleutian Native might not be so identified by tribes. BIA does not know the range of error for their data.
4. Road miles from border of reservation to border of nearest city. (Rand McNally Road Atlas, 1990.)
5. Standard errors are in parentheses. Note that the standard errors are quite small due to the large sample sizes on American Indian Reservations and Trust Lands.
6. The Alaska, Oklahoma, and Washington IHAs are not included because they are not clearly defined by a single Reservation or Trust Land.
7. Standard errors in parentheses.
8. Road miles from border of reservation to border of nearest city. (Rand McNally Road Atlas, 1990.)

## APPENDIX C

### SUMMARY: OIP DIRECTORS' ASSESSMENT OF IHA USE OF SECTION 8 VOUCHERS

Telephone calls were made to the six OIP Directors in the HUD Field Offices to determine their views on why IHAs have not made greater use of Section 8 vouchers and certificates.

A summary of their comments is as follows:

The reasons for low IHA interest are complex, and involve issues relating to the private housing stock, past experience with HUD programs, and institutional and cultural barriers.

The FY 1991 Notice of Funds Availability indicates that IHAs are qualified to apply for Section 8 voucher commitments. However, very few IHAs chose to apply.

For many IHAs, particularly those in isolated areas where little privately owned stock exists, the program has little relevance. However, the OIP Directors indicated that there were a significant number of IHAs where the program might work but that, even with these IHAs, the voucher program has not been used for the following reasons:

1. General lack of knowledge. IHAs do not attend conferences with PHAs, compare notes with them, and are generally unfamiliar with the voucher program;
2. Lack of training. The OIP and IHA staffs have had no training in the voucher program; OIP staff are therefore not able to train IHA staff on the program;
3. Misconceptions. Many IHAs are under the impression that applications for voucher commitments will result in commensurate loss of new construction subsidies; HUD reassurances to the contrary have not been effective;
4. Lack of Incentive. For many small IHAs, the small administrative fee of the voucher program provides for too few staff dollars to make the program workable;
5. Lack of sophistication. Due to high turnover of both top staff and Directors, many IHAs suffer from the lack of expertise to effectively manage the program.
6. Economic benefits. For a few IHAs, the new construction or repair housing programs provide opportunities for controlling the selection process, in training or in allocating units, which does not exist in the voucher program.

In those cases where the IHA is already operating the program, the consensus among the OIP Directors was that the program was working well. Most programs were succeeding in using their allocations, and the program was providing opportunities particularly for younger households to find housing nearer to job locations. In this connection, the portability of vouchers was regarded as a significant program improvement.

The OIP Directors indicated that the IHAs in which the program is most likely to work well are located near urban areas, with a sufficient supply of privately owned housing, or IHAs with "patchwork" land patterns in which small towns or privately owned housing units are located between unconnected reservation parcels.

OIP Field Directors Contacted

- |                      |                   |
|----------------------|-------------------|
| 1. Chicago, IL       | Leon Jacobs       |
| 2. Oklahoma City, OK | High Johnson      |
| 3. Denver, CO        | John Endres       |
| 4. Phoenix, AZ       | C. Raphael Mecham |
| 5. Seattle, WA       | Jerry L. Leslie   |
| 6. Anchorage, AK     | Marlin B. Knight  |



