

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

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*Durant, Oklahoma, July 9, 2012*

## **A. Proceedings**

Chuck Hanson, Econometrica, welcomed the participants to this final consultation.

Wayne Sims, Southern Plains Office of Native American Programs Regional Administrator: Welcome and good morning to tribal leaders, housing professionals, and commissioners. It is a good day here with some rain. As a child I never traveled, but as an adult I have had occasion to experience all sorts of climates and environments, but this is home. Most of you probably wouldn't live or work anywhere else. I am pleased to be part of this consultation for the housing needs survey. HUD is trying to renew the effort to quantify the housing needs; Oklahoma has 37 different tribes in this state, making it a challenge. This has become our home and we are proud to be here. We want to make sure that we count and have as good numbers as possible so our children will be glad to live and work here in the future. There are challenges in the survey and HUD will do as good of a job as they can. We are glad that many of you have returned from the session last year. PD&R has a limited funds, time, and resources and I know that we all hope that they are successful in this endeavor. It's very important, and we are glad that you are here and want to be a part and we welcome your input. Welcome!

Duane Winship delivered an invocation.

Erika Poethig, Acting Assistant Secretary for the Office of Policy Development and Research: Thank you for coming; this has been a real journey. We have been listening to your thoughts about approaching this survey for about the last 24 months. We are coming to an important milestone; this is the 8<sup>th</sup> and last consultation before we apply the input to the survey and move to implementation. Our set of presentations give you the information you need to get us the input we want from you to make this a successful survey. It's been over 15 years since we last undertook this effort. A few years ago Congress gave us the resources and mandate to measure needs in Indian Country. We are here with the explicit direction to measure housing needs.

To set the stage, let me explain what the study is. It is an update of the 1996 assessment. That assessment provided a platform and opportunity to assess needs. This is a national level survey of needs; we know those are diverse and we want to get a sense of the diversity across geography. This is not a tribal level assessment, meaning we cannot distinguish from one tribe to another. This will not inform the grant formula. In other words, it will not affect the slices of the formula, although it could be a very important piece of information that we can use to talk about increasing the size of the pie overall. Finally this is a partnership, not a closed exercise. We

believe this will not be successful if we approach it from a silo way. We need your help to make this a successful investment. We have received input in an earlier stage referenced earlier today and this is part of the effort to make sure the instrument will frame the right questions. We have invested a lot of money in the development of this questionnaire. Some tribes have indicated they would like to implement these themselves. Some tribes want to use the instrument that we have created to inform their own strategies. We invite you to do that if you like. Regarding where we are in the process, we are in the design phase and close to implementation. We hope by fall to start implementation. By 2014, we hope to have a final survey analysis that we will make publicly available. We do plan to share this with the tribes prior to the public release. We have sought input at every step in this process. For instance, the minimum tribal size was reduced as a result of the input. A key partner in this process for PD&R is the Office of Management and Budget. We have already started the review process with them in order to expedite the process; they will approve the final surveys.

I would like to turn the presentation over to Jenifer Stoloff, the project officer whose email address is across the county. She will provide some additional information.

Jennifer Stoloff, Study Manager, Office of Policy Development and Research: The mandate that Erika mentioned gave us the authority to move forward on this important piece of work. I also want to say that some of you may have been here last year and this is a follow up. We are a little further along but it's still so crucial that we continue to receive your input. The sign in sheet has a place to sign up for an electronic mailing list so you can get occasional updates as the study progresses.

To provide an overview of the study: it is managed by PD&R, and we have hired contractors to undertake the field work. The Urban Institute leads that effort along with other partners including NORC and Econometrica. We will produce notes from today's consultation and post them to the website following this meeting.

There are a few elements in addition to the household survey; those won't be discussed in as much detail today but we can address any questions you have regarding those. In the packet, there are several items including a summary of the survey, FAQs, changes made since last year's listening sessions, a list of the sample tribes that is likely final at this point, and a short introduction to the sampling methodology for this project. There is also a question sheet for later use and a copy of the household survey, in draft version, and the survey for tribal housing office or TDHE, whichever is appropriate. A copy of the web link is also provided where you can access these and other materials.

Nancy Pindus, the Urban Institute: We are pleased to be working on this study; our director headed the 1996 study and is looking forward to updating the data. This is an enhancement to the 1996 report, which was the first of its kind to report on housing conditions and need in Native American/American Indian lands. We are meeting demanding goals to inform policy and create

credible, consistent information. The project team was mentioned already, to give more background; the Urban Institute is a nonprofit based in DC. NORC is a premier survey research organization in Chicago and Bethesda. Econometrica is a research and consulting business in Bethesda, and Support Services International is a Native owned research firm in Silver Spring. The main research topics are as follows: housing conditions and needs; demographic, social and economic conditions; housing policies and programs; and assessment of Native Hawaiian housing needs and programs. There are several sources of data including the household survey but also analysis of Census and other secondary data and other primary data collection. The household survey is the key to understanding family and housing conditions in the areas. A web based survey for TDHEs was added in response to the earlier listening sessions. Finally, a separate case study approach will be used for Native Americans in urban areas.

In terms of the household survey, this is a nationally representative sample due to the mandate from Congress. In order to do that we are using proportional stratification by region and size based on 2010 Census data. We will work with each selected tribe to determine how to select a sample of those living in the tribal area. A similar method was used in 1996 and this will give us a good geographic distribution; we are sampling more households this time. Through questions and direction observations, the household survey will address key research questions related to living on tribal lands.

Chuck Hanson provided the ground rules and flow for the open discussion period, including the recognition of eliciting questions first from tribal leaders and elders.

## **B. Questions and Answers**

David Southerland: How do you select the families that will be part of the study? What if tribal rolls aren't available, for instance?

Erika Poethig: It is important to talk about context. Regarding tribes in Oklahoma, Carol of NORC will address.

Carol Hafford, NORC: Oklahoma does present challenges in terms of the sampling methodology. We are using Oklahoma tribal statistical areas, very large land bases. The population is dispersed throughout the state, so we need to rely on screening such as possibly mailed notices. We hope to use the United States Postal System mailing lists for the sampling frame so we can send advance letters and from that we can identify which households are tribally affiliated. We will work with tribes to identify zip codes where the majority of the tribal members may live. This will be coordinated with the housing authority or other office in the tribe and statisticians at NORC. We may also work with the tribe to do the sampling based on their membership list. We provide instructions for systematic sampling for a random sample. If the membership lists or housing lists are not suitable, we can go back and identify where the majority of the families live and go do a listing, where you identify all of the housing units and

establish locations and that becomes the basis of the sampling frame you then select from. In short, we will work closely with each tribe represented in the sample to establish confidence in the sampling lists. This can be quite complex.

Sabrina Stephens: I was also in the Lincoln, NE consultation and I wanted to follow up. On slide 23 you used a sample selection and the data is from the Census. In the introduction, you recognized Census as flawed yet you are going to use some of it. How do you determine what data is good versus what is bad? Second, when you go to do the survey in homes, there is a spot in the surveys that asks interviewer to identify dilapidated structures. What qualifications will these observers have to make these judgments? There may be structural issues not visible.

Erika Poethig: Tom Kingsley answered part of this in the Lincoln consultation. So we are using the Census as part of the statistical sampling areas for geographies. We align the geographies but the households are selected through working with the tribal leadership. Does that address your question?

Sabrina Stephens: Is this something you use as an instrument in the formula? If so, we want it to be more credible than Census.

Erika Poethig: This study will not be used to drive the formula. It is an assessment of need, a research piece that can be used to talk about the size of the pie in order to address needs. In terms of the relationship to drawing the sample, the proportions that were mentioned in relation to the tribes selected, those do come from Census population counts. Nancy, please talk more about the Census analysis and how it complements the household survey.

Nancy Pindus, The Urban Institute: There are different uses of the Census. The 2010 Census is the best source of data that we have. The talk about flaws is more concerned with American Community Survey (ACS), which are a sample and not a Census. We are using Census to get a sense of size and distribution. The data about the housing needs and conditions will come from the primary data collection at each tribe. We are doing other analyses with Census and ACS data to get a sense of trends but it won't tell us as much about housing needs and conditions. That will tell us more about how populations have shifted and moved.

Erika Poethig: You asked a second question about the judgments. Regarding your concern about the qualifications of the persons who will assess the condition of the stock. The questions related to this matter are used in a lot of survey and the quality of the answers results in valid answers. This has been verified in previous research by follow up questions.

Carol Hafford: There are two parts to your question. Section J refers to this enumerator observation. This means the interviewer walks around and looks at the condition and will be specifically trained for this observation. The qualifications are based on the training they will receive and that includes 6 hours of training and 4 hours of home study and 4 hours of field

training, including using HUD provided materials, to assess the quality of the housing stock. An expert consultant may also be used to lead that part of the study.

Grace Bunner: Did you work with the tribes selected for the survey sample? Did you contact them? As far as address based mailing lists, have you found out if tribes are receptive to giving these lists out? Does it impact privacy? Was the cultural background of each tribe considered? I don't think the training you mentioned gives enough expertise to an interviewer to look at a home for the conditions specified without skewing the results.

Erika Poethig: We have been distributing this list of the draft sample of tribes. But the instrument is not final so we have not done some of the things you mentioned yet. Once it is final, we will work with the tribes to get the lists, etc. On this sheet of paper there are 40 tribes at the top and 20 at the bottom. If a tribe from the 40 does not want to participate, we will select one of the 20 alternate tribes instead. Does that answer your question?

Grace Bunner: No, that is clinical and I want more depth.

Erika Poethig: Carol can give more information regarding the outreach to tribes.

Carol Hafford: For each tribe selected, we plan to conduct a personal and intense outreach effort. Our approach is to first contact the tribal leader via a letter from HUD and then follow up with letters from the study team. This will begin the process of observing the customs of the tribe and working with the tribe's research requirements such as IRB, tribal resolution, working with leaders, etc. Outreach will also work with workforce offices, TANF [Temporary Assistance for Needy Families], colleges or other entities to recruit tribal members to serve as field interviewers. Since each tribe's sample presupposes 30-40 respondents, we expect 1-2 tribal members, or community members if preferred, to implement the survey. We work through these arrangements with each tribe in a negotiated and consensus oriented process. We will then move forward with implementation once an agreement is met. In the background, the training is quite comprehensive and is based on NORC's principles regarding privacy, confidentiality and securing data. It is also our goal to develop capacity at the tribes so they undertake future work themselves. NORC has done this work for over 70 years. The typical survey training is about 16 hours, depending on how familiar the interviewer is with the work. You can extend the hours if needed but it is tailored to the needs of the study and the level of the background of the field interviewer. We have a training mapped out and it will be more formalized, but we can look again at the issue regarding enumerator observation. We will use HUD materials for that. One thing that could be helpful, for instance, is photographs that demonstrate structural issues in the community to improve training. The approach is tailored to each tribe. Lastly about confidentiality, when we request addresses, we don't need any other personal information aside from address. So we don't need names, phone numbers, just a physical location. In reference to the cultural aspect, we are doing all of this in a tailored, individual way so that it is done in a culturally competent manner. That involves issues such as the best time of the year so data

collection doesn't conflict with cultural events to knowing whether or not it's preferable to have tribal members conduct the survey versus non tribal members. We will also consider the approach to asking the survey questions so they are consistent but we recognize that terms may differ etc. We will translate instruments to administer in indigenous languages if necessary. Those tribes will tell us what to think about so we can be appropriate and respectful.

Curtis Zunigha: I'd like to focus on the end result. It is my belief that Congress called for an assessment three years ago. We are partnering with HUD to complete this assessment, but in 3 years we still have a draft survey and there is all this prep work. In the ever changing political climate, my concern is when do you project this survey will be complete so that HUD leaders and tribal leaders can use the end result to increase the size of the pie? I realize how long it takes but I'm concerned about the lag. When can we use it? Our little bit of money is extremely important to us with a growing demographic of children and elders.

Erika Poethig: The study will be complete in 2014. So in terms of a fiscal year, that is 2015. We will be sharing early draft copies for feedback in advance of that but will not release the report publicly until 2014. All of the efforts and outreach you heard described are what make the survey successful but it does then take longer in the implementation process. That is required to be successful. We started this engagement process 2 years ago with listening sessions and that was not a formal consultation process so we then initiated this series of formal consultations. Part of the reason why it has been 3 years is we had this very important process of listening and engaging and adapting the instruments based on feedback. We are at the stage now that we can begin finalization so we can get into the field as soon as possible.

Scot George: Can you review how you selected the tribes for the household sample versus the TDHE sample?

Erika Poethig: That is a great invitation to discuss this complex process. The material references are the sheet that lists the sample tribes as well as the overview on sampling from your packet.

Nancy Pindus: There are two samples because we were trying to get, in each case, as large of a sample as possible within the budget constraints. The telephone surveys of TDHEs are less expensive than household surveys, which is why there are more of those. We divided the country into regions and then divided the tribes in that region. Larger tribes have a greater chance of being selected.

Scott George: Looking at the 40 tribes selected for the household survey, there is an understanding that those are more successful in implementing NAHASDA. There is a higher probability that you will find more satisfied persons since larger tribes are often better at providing services.

Erika Poethig: We must honor the randomness of the selection process. However, we wanted a mechanism for all tribes to participate in the TDHE survey. This underscores the effort that HUD

is taking to building a website so that any tribe that wants to participate in the TDHE survey will be able to do so. This will give them an opportunity to report on their assessment of housing needs and capture a fuller assessment with the resources we have, which are limited.

Adam Rose: Is there a mechanism for tribes to engage in the household survey themselves, at their own cost?

Erika Poethig: That is an important question that we have been asked at every consultation. Due to the importance of the methodology, we cannot include surveys that are conducted outside of these 40 selected in the analysis that we do. We do think tribes should conduct their own surveys, and share with us their results, though we cannot put those results in the same calculus as the 40 surveyed tribes due to issues with valid research results.

Carol Hafford: NORC has extended an offer to provide technical assistance if your tribe wants to undertake this survey effort on their own. We may even attend some conferences to provide some large scale training.

Erika Poethig: Also, tribal colleges have been suggested as source of support for this.

Wayne Scribner: Is there a set number of interviews for each tribe selected? Is this going to be separated by region?

Jennifer Stoloff: There will be approximately 40 surveys per tribe, proportionate to population of tribe. The survey data will not be broken by region because we don't have sufficient sample sizes to look at by region. The Census data we may be able to present that way, although that analysis is more about other demographics such as rural versus urban. We welcome thoughts on breaking out the Census data further.

Luke Toyobo: What are the five urban areas selected? Will the methodology be similar to the tribal areas and how will the households be selected?

Nancy Pindus: It is not a household survey for the urban part of the study. The five areas have not been selected yet but will be selected using Census data based on size and tribal population concentration. The methodology basically includes identifying any coalition that has a research review process, if applicable, and dealing with urban community centers or public housing authorities, if applicable, to make sure we contact the places that provide the services and have contact with Native Americans living those areas.

Grace Bunner: How are you going to take into consideration the homeless, especially in the urban areas?

Erika Poethig: That is an excellent question. Obviously this is a survey of people in households but we have heard homelessness in Indian Country may look different than other parts of the country, for example, it may include families doubling up. We can get a sense of that from the

household survey. In terms of people living in the street homeless, this would be something we can pick up in the TDHE survey. There is an expectation that we can get information about homelessness from that tribe.

Grace Bunner: That does not take into consideration the street people between Oklahoma City and Tulsa.

Erika Poethig: As part of a different process, HUD does a point in time count annually with local jurisdictions at a time when most homeless people are expected to be out. This gets a better sense of the homeless population in a particular area. This is the primary mechanism for capturing that data annually.

Jennifer Stoloff: There is another effort running in parallel with this study on a smaller scale. In Minnesota, the Corporation for Supportive Housing has prepared a toolkit that any tribe can replicate. That was successful and helped them increase funding. We hope to publish and distribute the toolkit in conjunction with the Housing Assistance Council. That kind of study can be done in tribal areas but it's more focused than this study. We worked really hard to capture doubling up and overcrowding in this effort, though. We recognize the importance of the issue but are not attempting a count of homelessness.

Grace Bunner: Will there be any spinoff benefits to the survey you are doing? For example, mortgage lenders could be receptive to findings leading to a change in policies for lenders, and giving easier access to lending for tribal members.

Erika Poethig: Let me answer that broadly. We are doing this study to get a sense of where policies do and do not work. This can be HUD policies that Congress pays attention to. That is why we chose access to credit to see if it is an issue, where, why, how, etc. So that is one of the uses we are hoping comes out of this study is better policy.

Curtis Zunigha: I am an ex Chief and ex Executive Director for a Housing Authority. I am hearing a lot from the tribes as to what they want from government but if the survey data is to be used to affect the size of our pie, based on my experience with the 2010 Census, the partnership approach is the right approach. Once the tribes know the operation that is going to be going on, then with advance notice, they need to reach out and alert membership and request cooperation and participation so we can get quality data. Because we know most Indians don't want to give information to government interviewers, but if tribal leaders tell them how much their answers will help meet need, the partnership approach encourages responsibility on the tribes and government to make this work. It will help to get tribal members to be forthcoming and complete in their answers. Tribes want to be active, and if there are jobs to be had, we want some of our people to have those. Tribes can offer a cultural liaison, a person who knows the protocols in a given community to guide the consultants who come in seeking to get a quality outcome, whether by telephone or in person. We need this quality data to advocate or lobby for more funds.



Erika Poethig: Thank you. Regarding jobs, it is our intention to recruit from tribes.

Carol Hafford: NORC works closely with the community and the community works with our Human Resources department. A process is in place for recruiting, in tandem with appropriate tribal offices such as TANF. Recruiting includes the necessary number of interviews and additional persons trained to account for potential attrition. There are background checks for qualifications, an interview, and NORC's Human Resources works with the tribal organization. This is a short term position with full NORC credentials including training and transferable skills. Pay scale is about \$17 per hour for a field interviewer. The hours per case (hours applied to each interview) vary since the length of time can vary depending on the respondent. Depending on the mix, caseloads can vary. It is a good opportunity to add to one's resume. Field interviewers for NORC can include persons who work full time or part time, with some specialties as well. As we work with each tribe, we will present more detailed information about recruitment and hiring, but it's a worthwhile opportunity. We heard for instance that higher education institutes such as tribal colleges are interested in being involved.

Grace Bunner: Is there mileage and other reimbursement available in addition to hourly rate?

Carol Hafford: Yes, all of the field travel expenses are reimbursed.

Grace Bunner: How often would they be paid?

Carol Hafford: I will have to verify, probably bi weekly or monthly.

Adam Rose: What is the timeline for completion of the surveys?

Jennifer Stoloff: The changes will occur over the next month or so and then the instruments will become final after that. Please submit for consideration any additional feedback within 10 days after today specific to the instruments.

[Unidentified Participant]: Looking at the list of tribes, Texas is not among them. We have 3 tribes as well as urban dwellers in Dallas.

Erika Poethig: You see here that the sampling frame took into account the statistical area that includes the Oklahoma area. They are likely larger and that is why they were selected for the sample.

Nancy Pindus: This is what happens with random sampling. We have not selected the urban sites yet, though, so there could possibly be one in Texas.

Grace Bunner: What Congressional committee will be reviewing the results of the study?

Erika Poethig: The committee that requested it and created the impetus for the funding is the Senate Appropriations committee for Transportation and Housing and Urban Development.

However there will likely be interest among a number of committees and we will likely hold a Congressional briefing when the report is complete.

Grace Bunner: We have heard that the results of this will not have a bearing on the formula but if it is going to the appropriations committee, how could it not?

Erika Poethig: It's true that the study could suggest formula improvements but it is not statutorily tied to the formula, so there is no automatic change. Some studies are connected to changes of that kind, and this is not one of them. It will inform policy conversations but has no automatic connection to the formula.

Jennifer Stoloff: One thing that has been discussed as a possibility is sending early drafts to the tribes that participate for your feedback to ensure that they are culturally appropriate and accurate. Once the report is finalized, we would like to have a conference to convene the tribes and other interested parties to bring some results, address questions and answers, etc. This would possibly be held in DC and across the country if funds allow. We also would like to make a public use file for data results. This data would be de-identified so it can be shared publicly and your own analyses can be conducted. We will continue to work on that throughout the process and are committed to transparency. Sign up for the e-list for regular updates. Also don't forget the tribal TDHE survey that will be available online. That only works if we get a high level of participation.

Carol Hafford: Suzanne Bard, the field manager at NORC, has indicated that field interviewers are paid biweekly and that includes paid travel time to and from the interview sites.

Diane Hammons: The term Indian land is problematic in Oklahoma and in reviewing the questionnaire, if it is followed precisely, it will not be answered correctly or completely. For instance, living on tribal land is not applicable in most of this state.

Erika Poethig: We appreciate any notes that indicate instances of problematic questioning. We will also screen for those as well.

Kathy Deere: On the surveys, how are you going to designate which household to select? Is that random or designated by tribal leaders?

Erika Poethig: That is a great question for Carol.

Carol Hafford: What happens is that we develop a tribal level sampling frame. That list is validated and then we randomly select from that list using an algorithm developed by statisticians so that the group is truly random. We can also work with each tribal housing authority, if they hold the list, to do the selection themselves. We provide procedures and tribe provides addresses back to us and we work from there.

Kathy Deere: Knowing natives, a lot of them won't let you in their house without an incentive.

Carol Hafford: Yes, all respondents will receive a \$20 voucher/gift card/certificate of some type as compensation for the burden on their time. Each tribe will help us decide what a good incentive is for that tribe, such as a gas station locally, etc.

Regarding who is going to answer the survey- that will be the head of household, but if that person is not in a position to respond, they can designate a proxy, or alternative person, to give their voice.

Kay Rhoades: You said the houses will be randomly selected. How do you account for moving?

Carol Hafford: We over sample, that is, we select more than we need. For example to get 40 responses we might need to select up to 70 houses.

Steven Landsberry: How long does it typically take to fill out this survey?

Erika Poethig: About 45 minutes.

Carol Hafford: The pretest came out at about 50 minutes but it depends on a number of factors. For instance, the response, how long they take to respond, and how many persons live in the household. These tend to be about an hour, which is about the longest a person tolerates an interviewer in their home.

Grace Bunner: Was the pretest with a Native household?

Carol Hafford: Yes, all of the instruments were pretested with Native households in Alaska, Oklahoma and I believe Wisconsin. We also took into account different cultural considerations at each site, for example, the presence of extended family members. Two of the field interviewers who pretested were also Native American.

Floyd Jones: Are we talking about rental properties and inventory units?

Erika Poethig: Yes, both unassisted and assisted units are included.

Carol Hafford: Several of your questions related to the issue of community disclosure, which is an important part of human research disclosure. What was said earlier regarding the partnership is true. People participating in this survey need to understand what this entails and what to expect. We will provide information to help get the word out, such as advertising in newsletters, so that the interviewer showing up is not an unexpected surprise.

Ron Bearskin: In Lincoln, the issue of confidentiality came up. And the data collected from tribes was to stay confidential. But it would be good if all data were available for all tribes.

Erika Poethig: Yes, we heard that and as Jennifer mentioned earlier, we are going to create that public use file as a way to share the data without identification.

Grace Bunner: How are these needs going to be prioritized on a national level?

Erika Poethig: We are not in a position to have that conversation at this point.

Grace Bunner: How many priorities do you see that may come to the top? How many will you work with?

Erika Poethig: The purpose of this assessment is to get a sense of need and until then we won't know how many may arise and the weight of each. The results of the research will show us that.

Grace Bunner: That is a difficult decision to make. At a national level the number one need may not be the number one need for a particular tribe.

Erika Poethig: I hear what you are saying, and I understand that this being a national assessment the highest needs of the most populous tribes will show. However, the TDHE helps us capture the wider range of tribes and issues and need. A great deal of focus has been on the household survey but the TDHE survey will give us a bigger picture with more needs and context. No more satisfying of an answer can be provided in advance of the research.

Wayne Sims: I agree wholeheartedly with what Curtis said regarding buy in. What we have here is a request by Congress to do a report to tell them about the needs of Indian Housing. The report will reflect that. That being the case, I was involved with the Urban Institute the first time around. The process is as good as it can be given the circumstance. I can't see it as anything but an opportunity to enhance our ability to go to Congress. The key is to say there should be, has to be money, not how to divide it up, which will probably be as it has been.

Derrith Moore: I am a senior policy advisor to Secretary Donovan on tribal housing matters. I've been with HUD almost 2 years now and I've followed these consultations. This is my third meeting. One thing I am suggesting to Secretary Donovan is a mechanism within HUD to have policy discussions across HUD on tribal matters. And what I've been exploring is an advisory committee across HUD. I am putting that on the drawing board as something to consider as we get to the results phase. Negotiated rulemaking is also a mechanisms but not for this kind of issue.

Erika Poethig: Thank you for mentioning that. I recognize that negotiated rulemaking is happening next year and this research won't inform that. But establishing another mechanism to use this research to inform policy and other colleagues in other agencies is important.

Grace Bunner: Regarding the unit characteristics, the questionnaire asks about the number of bedrooms but not square footage. What about questions about manufactured housing? There are questions about income, but not purchase price. Am I missing them?

Jennifer Stoloff: Square footage is not asked because it is hard for people to estimate and accurately capture. We do ask the unit type, so we capture manufactured housing there as type. We should think about specific questions though that may pertain to that type of unit. Some open ended questions may capture related information. Regarding purchase price, I don't believe that

is asked but we may need to consider it. There is a length constraint. A separate lender survey is being conducted but we know that the homeowner perspective may be valuable.

Luke Toyebo: In Indian Country, a lot of people can't quantify the purchase price but they can tell you the monthly payment.

Jenifer Stoloff: That's probably a reason why we didn't ask that question.

Michelle Tinnon: Are you also asking homeowners if they carry homeowners or renters insurance? That's a serious issue; uninsured households suffer total loss in the event of a fire, etc.

Erika Poethig: That is an important question concerning all kinds of natural disasters. Thank you for noting that, we will take a look at survey and possibly add that.

Regarding manufactured housing, that is an observation point.

[Unidentified Participant]: If for example you do a household survey in the Cherokee nation and there is a Creek person living there not on list, how does that work?

Jennifer Stoloff: The screen is whether or not the person identifies as American Indian, Native American, or Alaskan Native. Hypothetically that person is eligible to answer. But it really it depends on how the list is created, such as by using USPS zip codes versus a list maintained by tribe. They are eligible and important in any case. They represent the region rather than the tribe. The quality of the USPS list is high in several Oklahoma areas and will be used when good. However, to target efforts to geographies with highest concentrations of American Indians, we will work with tribal leadership to find areas of focus.

Michelle Tinnon: Are you referring to federally recognized tribes only or persons who self identify as American Indian?

Jennifer Stoloff: The tribes who are sampled are federally recognized but individuals do not need to prove they are tribally enrolled members to participate in the survey.

Wayne Scribner: Regarding the USPS list, is it based on low income? Two thirds of our persons are above median income.

Erika Poethig: No, it is all addresses. This is about the national level estimates. You imply that this takes need into account. We can't say before we start who has more or less need.

Wayne Scribner: if we aren't surveying low income Native Americans, this is skewed. I want to get behind the survey but we need to show need. There will be some low incomes surveyed but it's a coin flip. If most of respondents don't have need, it will indicate to Congress that there is no need.

Erika Poethig: I have a hard time believing that this survey will not show us that there are needs in Indian Country. The concern has been raised in various ways. Perhaps tribes in Oklahoma are better off, but recall that this is a national estimate and others are not so well off. The TDHE survey also will reach even more tribes and will capture more low income as well.

Wayne Scribner: If it was low income, it would show a greater need.

Floyd Jones: After 9 years away, I returned to housing. The issue of self-identification concerns me. There are reporting requirements to get certified and self-identification becomes a factor; those numbers equate to 50 percent but numbers are skewed. We aren't getting a true picture if we use self-identification. It's important that we identify in a greater way because it's not a true indicator.

Erika Poethig: I appreciate this question but there are great differences across the regions on this issue. If you have suggestions, we appreciate hearing those in writing as there are a great variety of opinions on this issue.

Jason Dollarhide: The gentleman brought up a good point on self-identification. The fact that there is a lack of tribal involvement in this study is a huge issue. You have state recognized tribes with no funding. That's another reason that tribes need to become more involved in this study. I am sure you are getting negative feedback about this lack of tribal involvement. I hope this study does show need for Indian Housing and Indian people.

Kay Rhoades: You are asking about access and have listed paved roads, dirt roads, etc. We have paid for driveways for tribal people. I think you need to address that as well. When you selected the 40 tribes to be surveyed, all of the Oklahoma tribes are in the eastern part of the state. They are a lot different than the western part of the state. These have different needs. Chairwoman Edwards raised the issue during the break concerning eastern Oklahoma. Also how do you define Native American?

Jennifer Stoloff: We don't define Native American and we don't use the term "federally recognized" because there are state recognized tribes included in the survey.

Erika Poethig: Concerning eastern versus western Oklahoma, the reality is that there are larger tribes on the west, and the frame picks up larger tribes. But if that leads to a structural bias whereby we will get biased results, we might be able to reconsider the sample. But that needs to be that spelled out in writing for us to take into consideration.

Marilyn Threlkeld: Will this survey be used for the next 15 years?

Erika Poethig: It is my hope that we have the resources allocated to do this needs assessment on a more regular basis. We were without resource to do much research for most of the 2000s. We are hopeful that this can be included in more regular research in the future.

Curtis Zunigha: As part of Indian Housing Plans, we are supposed to conduct a needs assessment. How much of that information is compiled on a regional or national level? Does it have any relationship to this national assessment? We should already have good numbers and this is a special study. I don't believe the quality our own assessments is that poor.

Erika Poethig: ONAP is going to share that information with us so we can use it to inform our study and in part, compare self reported data to what we observe. One thing we have heard from other tribes is using the household survey instrument as a way to inform their own needs assessment. This comes back to the offer that Carol made to provide technical assistance on using this survey.

Wayne Sims: We will be glad to share any information that is helpful. That needs assessment data though is used to establish that you have a need more so than define what it is. The new format is not real detailed.

Erika Poethig: That is an important distinction. This study gets a finer sense of the need versus simply establishing need.

Erika Poethig: Thank you for being so engaged in this conversation and participating today. This was the largest group and we felt a warm welcome. As this is our last consultation, we are prepared to soon begin finalizing things and recognizing that Oklahoma has a deep history and special circumstances, we will do our best to ensure instruments are well suited. Thank you for your honest feedback and for ending on a positive note in these consultations. We are eager to have this report to inform important policy.