



## Association of Alaska Housing Authorities

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July 5, 2011

Ms. Jennifer Stoloff  
U.S. Department of HUD  
Office of Policy Development and Research  
451, 7<sup>th</sup> St., SW Room 8120  
Washington, D.C. 20401

**RE: Association of Alaska Housing Authorities –  
Comments on HUD Nationwide Housing Needs  
Assessment – Draft Data Collection and  
Analysis Questionnaire**

Dear Ms. Stoloff:

These comments are compiled from individual Alaska Native regional housing authorities in Alaska and from the Association of Alaska Housing Authorities in general.

### Household Survey:

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

- It may be more convenient to households if the three-page household screener instrument is conducted by telephone in advance. This way, the interviewer could coordinate an appropriate place and time for the in-person household survey before showing up on the front porch.
- It would likely be helpful if a copy of the questions is sent to each household prior to the interview.

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

information on how many of the household residents have ever participated in a housing program, whether operated by a tribe, tribal organization, non-profit, or government entity, that made rent affordable, helped pay utilities, or provided other housing assistance.

- Part B, Housing Unit Characteristics and Conditions:
- Section B21 (page 16) – Heating Fuel. One of the response options is “kerosene or other liquid fuel.” In Alaska, diesel fuel and heating oil are exceedingly common liquid fuels in rural areas. For purposes of clarification, the response option should read, “kerosene, heating oil, diesel fuel, or other liquid fuel.”
- Part D, Culturally Responsive Housing:
- Section D4 (page 24) – Choice of Housing. The question, as presently written, gathers little data. Almost all respondents would choose homeownership as the model they most desire. The question should be rewritten to gather information on preferred housing styles and exclude as a variable renting vs. homeownership. Also, consider a box for “other” that would allow respondent to describe another preferred style of housing.
- Pg 24, D4: Agree w/ note 10.
- Part H, Attitudes toward Tribally-Assisted Housing:
- Pg 31, H2: This is a complicated question. In general terms however, I hope the researchers understand that the MHOA Agreements / contracts that were used in the past, and in many cases may still be used for NAHASDA units, place 100% of the maintenance of the MHOA units on the homebuyers. This is not true for rental units / facilities of course, but the question does not distinguish between homeownership and rental units which is something that the researchers should think about.

This question asks whether a “tribal housing authority” does “its share” of keeping a unit in good condition. Under some programs, such as Mutual Help, it is the responsibility of the resident, not the tribal housing entity, to maintain the unit. However, this will not stop some of the participants in such programs from responding that the tribal housing entity should do more to maintain the unit, even though it is the intent of the program to help residents develop self-sufficiency as they transition to homeownership. Thus, this question does not provide an accurate indication of whether the tribe or TDHE is actually doing “its share” of the maintenance. Rather, it measures whether the resident wants the tribal housing entity to do more, regardless of

whether the resident or the tribal housing entity is responsible for maintenance under a particular program. Because the question does not distinguish between rental programs, homeownership programs, and other programs (like Mutual Help), it does not provide very good data.

Pg 35: Not sure where this question should go, but there should be a question about whether or not the homeowners of assisted units feel they have the income to support their homeownership re maintenance and upkeep vs. just utilities; how much on average they are spending a year; and whether they are doing work themselves or having to contract it out either to a housing authority or some private party.

Pg 38: Very few people are going to know their lot size.

#### Part I, Household Income and Housing Costs:

- Homeownership. Even though this section deals with housing costs, it does not attempt to measure how much homeowners spend on the costs of maintenance, repairs, insurance, and other costs of owning a home. More importantly, this section does not gauge whether those individuals who own their homes and thus are responsible for such costs have sufficient income to cover the “all-in” costs of homeownership. How much on average do homeowners spend on the foregoing costs each month or year? What percent of their income is committed to their housing when such costs are combined with debt payments? Are they doing repairs and maintenance themselves or paying for it? Do they receive assistance from a tribe or housing organization?
- Transition to Conclusion of Interview. It should be noted that the instrument leaps from gathering sensitive information about household income and expenses into the conclusion. The first sentence in the document titled *Concluding the Interview* is, “I will be sending this document to our offices in Chicago.” Some may believe it is odd to gather sensitive income information, then immediately indicate that the document will be sent to mysterious offices in Chicago. This transition probably should be softened.

#### Tribal / TDHE Survey:

Pg 4, A8: Would be helpful to know how “partner” is defined or exactly what this question is looking for in the way of a response. There are a lot of multi-faceted relationships involved in our work and I am not sure what you are really looking for here.

Pg 7, B8: Add “More funding,” or “Increased funding” as a response option.

Section D1 (page 8) – Housing Satisfaction by Program.  
Correct “CFAS” to read “FCAS.”

Section D1 (page 8) – Housing Satisfaction by Program. This question vastly oversimplifies the number and types of programs available in many service areas. Tribes and TDHEs may be accessing programs such as the LIHTC, HOME, 202, 811, Section 8, USDA RD programs, state grant programs, and many others. CIHA, for example, will soon complete a development that will include NAHASDA IHBG funds, state grant funds, soft debt from a state housing finance agency, and even Public Housing Section 8 Project-Based Vouchers.

Section D, Tribal/TDHE Perceptions of Resident Housing Satisfaction and Preferences:

Section E, Tribal/TDHE Perceptions of Housing Problems and Needs:

Section E4a (page 10) – Waitlists. While each tribe/TDHE maintains waitlists, it is unlikely that the person being interviewed will be able to provide figures from each waitlist memory. Other questions throughout the instrument likewise call for information that may need to be gathered before the respondent can report it. HUD should provide an easy way for respondents to follow-up with such information. Email would be preferable.

Section F, Approach to Strategy in IHBG Planning and Implementation:

Generally, this section is outdated. Since the last Needs Study in 1996, many tribes and TDHEs have become experts at leveraging NAHASDA to secure other funding. Though NAHASDA funding remains critical as the “first in” funding source, it is not the sole driving factor in planning and implementation of housing strategies. Today, developments and programs often include funding from a substantial number of other housing programs, and while the IHP process is an important component of that planning and implementation process for a given development or program, it is not necessarily controlling. Hence, tribes and TDHEs that have developed leveraging capacity have often adapted their planning and implementation processes to include, but not revolve entirely around, the IHP process for the Indian Housing Block Grant program. This section requires further consideration in light of the overstated importance of the IHP as a plan for all housing activities, rather than simply as a plan for the expenditure of IHBG funds.

Pg 13: Just a general comment. For many larger tribal and TDHE programs, our activities are probably not limited to what is supported by the IHBG. Also, the IHP is developed in many different ways, and in fact at least for us, it is more of snapshot in time type of recording device than a real development tool around which we build our program each year. Our planned activities are developed in a whole range of ways and as these activities are developed we add them to our IHP. For the most part, we do not have an isolated, singular IHP development process, it just kind of "evolves." For example, if we apply for a grant which may have some IHBG funds in it, the grant proposal very well may not be in a current IHP, but if the grant is awarded, it then may be added. Also, the IHP has a number of somewhat "generic" categories that may cover a range of specific activities. One of my tribes may decide they want us to pursue x, y, or z, and it is hard to say what specific impact this may have on the IHP or what action may or may not be taken to have it reflected on the IHP. I am not sure the way this section is structured that it really captures the prioritization or selection process that goes on in terms of development activities or other housing related services. The section is somewhat informative, but it could also be misleading in some respects in terms of what is really going on behind the scenes.

Pg. 14, F3: An additional choice for a formal needs assessment should be added so that Alaskan housing entities could utilize an assessment provided by a state agency such as the Alaska Housing Finance Corporation.

PG 14, F4: A response box should added to the effect that "Do not work outside of the tribal area boundaries," which for AK, is almost exclusively the case.

Page 17: Not sure if this is covered elsewhere, but there should be a question on how tribes / TDHE providers see the impact from not having any subsidies on NAHASDA units, and how serious we feel this defect is. At least here in AK this is a major obstacle to the development of rental units w/ NAHASDA funds. There should be one or more questions on this specifically and not just an opportunity to try and insert it under some question where you may answer 'other.' Also, questions G3& G4 should have an "other" response box. In relation to G3, Alaskan entities must ship and fly many

materials in to sites and water shipments can only be transported during certain times of the year.

#### Section G, Challenges in Housing Development and Operation:

Sections G3 and G4 (page 17) – Barriers. These two questions ask about barriers to construction and development. Both questions should include an additional response box, “other”. Many Alaskan entities must ship materials to sites by air or water. Shipments by air are limited by the weather, which is unpredictable. Shipments by water are only possible part of the year.

#### Section H, Assessment of Rules and Procedures under NAHASDA:

Pg 20, H6: This question should not be limited to soliciting responses from those familiar or somewhat familiar with pre-vs. post-NAHASDA issues. It is relevant to any organization currently delivering NAHASDA funded programs or services.

Pg 22, J3: In this question relating to barriers to applying for mortgages, please add “insufficient income.”

#### Tribal Leader In-Person Interview Guide.

Pg 1: How are these individuals going to be selected? The tribal / TDHE’s running NAHASDA programs should be involved in this selection.

#### General Comment

Throughout the survey instrument, there are questions requesting information on issues related to those who live “on or off the reservation.” Alaska has only one small reservation. Alaska Natives live in communities throughout the state – in villages, larger hub communities and in the state’s largest cities.

#### Tribal Housing Official or other Housing Officials In-person Interview Guide.

Same issue – same response as above.

Pg. 1, B8: The question states, “Are most adults employed? On or off the reservation?” Please note, there is only one small reservation in the state of Alaska.

### Community Leader In-person Interview Guide.

Who did the recommending here? Same issue as above.

Pg. 1, B10: Same issue as above – this question requests information on those who live “on or off the reservation.”

Pg. 5, E51: Same issue as above – “Has the Tribe and/or have households on the reservation....”

### **Lender Telephone Interview Guide**

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

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

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

### **Native Americans Living in Urban Areas/Telephone/In-Person Interview Guide**

#### **Local AIAN Community Leaders Module**

Importance of Understanding Housing Needs in Urban Areas. In many parts of the country, American Indian and Alaska Native families with the greatest needs do not live on reservations or tribal lands or in villages. In Alaska, for example, a substantial proportion of the American Indian and Alaska Native population lives in urban centers, including Anchorage and Fairbanks. These individuals are no less American Indian or Alaska Native for living in cities or off of traditional lands, and programs like the Indian Housing Block Grant are intended to serve them equally. The information gathered in this section of the Study will be critical to help promote equal housing opportunities for all Alaska Native and American Indian people.



Pg. 6, 50: The question asks, "What factors lead Native Americans to move from urban areas to reservations/tribal areas?" For Alaska, a better question may be, "What factors lead Native Americans to move from urban areas to villages?"

Pg. 6, 52: The question asks, "Do more people move between tribal lands and urban areas now than five years ago?" For Alaska, a better question may be, "Do more people move from small villages to rural hub communities and urban areas now than five years ago?"

Pg. 6, 53: The question asks, "Has the number of moves people make between tribal lands and urban areas increased in the last five years?" In Alaska, a better question may be, "Has the number of moves people make between villages, rural hub communities and urban areas increased in the last five years?"

Pg. 6, 54: The question asks, "Do you find that many or few Native Americans living in (community) maintain close ties with their tribes? A. Do people visit families or friends on-the-res? In Alaska, a better question may be, "Do people visit families or friends in the village?"

B. The question asks, "Why do you think that Native Americans living in urban areas do, do not maintain close ties with tribal members living on reservations or in tribal areas?" In Alaska, a better question may be, "Why do you think that Native Americans living in urban areas do, do not maintain close ties with tribal members living in villages?"

#### Community Group in Urban Areas – Discussion Guide

Pg. 1: Introduction and Consent – this section states, "Overview of the study....housing needs among Native Americans and Alaska Natives; one part of the study focuses on housing issues, needs and conditions among Indians living in urban and sub-urban areas off of reservations and tribal lands, and reasons people live in urban areas or tribal lands."

Again, instead of using the word "tribal lands," a better word in Alaska would be villages.

Pg. 3, 24: The question states, "Why do you think some people leave (community) to move to a reservation or tribal land? Again, in Alaska, a better word may be "village" as opposed to reservation or tribal land.

Pg. 3, 25: Change to: reservation, tribal land or village.

Pg. 4, 27: Change to: reservation, tribal land or village.

Pg. 4, 30: Change to: reservation, tribal land or village.

Community Discussion Group Participant Information Form

Pg. 1, 2: Change to: reservation, on tribal land or in a village?

Thank you very much for the opportunity to comment on the survey instrument.

Sincerely,

A handwritten signature in black ink, appearing to read "Duame", with a stylized, cursive script.

Dan Duame  
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