



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-6000

August 11, 2011

Mr. Dan Duame
Board President
Association of Alaska Housing Authorities
4300 Boniface Pkwy.
Anchorage, AK 99504

Dear Mr. Duame:

Thank you for your recent submission of comments regarding HUD's Assessment of Native American, Alaska Native and Native Hawaiian Housing Needs: Draft Data Collection and Analysis Questionnaire. We have carefully considered all of your comments and suggestions. Our specific response to each question may be found below.

Household Survey

Survey Process:

Comment: 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.

Response: These ideas will be discussed with each tribe during the outreach process. These approaches may not be feasible in locations where we do not have street addresses or where telephone service is a problem. We will tailor our approach to the circumstances and preferences of each tribe.

Comment: It may be helpful to provide an estimated amount of time the interview will take. This will help the respondent understand the time commitment.

Response: The introductory materials and interview introduction at the time of the household survey will indicate the estimated length of time for the interview.

Comment: 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.

Response: Informed consent procedures will include a clear explanation of how the survey information will and will not be used. We will clarify that the name of the respondent and any other identifying information will be kept confidential and not reported back to the tribe.

Household Screener:

Comment: 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.

Response: This item has been modified to ask for tribal *enrollment*, not tribal affiliation. By statute, The Indian Housing Block Grant is designed to serve enrolled tribal members, although there are some exceptions. Therefore, HUD will gather information that indicates if the funds are serving the intended target group.

Part A, Household Composition:

Comment: 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.

Response: Respondents will be informed at the start of the interview that they can choose to not answer any question that they feel uncomfortable answering, with no

consequences. Interviewers will be trained to remind respondents that seem hesitant about a question that they do not have to answer and to move on to the next question in a non-judgmental manner.

Comment: 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.

Response: In order to limit the length of the interview, choices have to be made, and not all questions of interest can be included. Due to concerns about the accuracy of respondent recall about past participation, we are not including a question on previous participation in a subsidized housing program.

Part B, Housing Unit Characteristics and Conditions:

Comment: 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."

Response: Section B21 – Heating Fuel -- One of the response options (fuel oil) was omitted for B21 and should read:

What fuel is used MOST for heating your house/apartment?

- Electricity
- Gas or liquid propane
- Fuel oil
- Kerosene or other liquid fuel
- Coal or coke
- Wood
- Solar energy
- Other (Specify)
- None

Part D, Culturally Responsive Housing:

Comment: 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.

Response: This series of questions has been revised. In its current form, the response set allows for the respondent to choose rent four times and purchase three times, so there is no implicit bias towards purchase or ownership.

Part H, Attitudes toward Tribally-Assisted Housing

Comment: Page 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 percent 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

Response: This question seeks only the perception of the respondent and will be treated as such.

Comment: Page 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.

Comment: 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?

Response: Questions requiring an estimate of repair, insurance, and maintenance costs, ability to cover these expenses, and how repairs are made, would add considerable burden for respondents and therefore were not included in the survey.

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

Response: We are only asking lot size in very broad parameters because we know the difficulty in obtaining this information precisely.

Comment: 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.

Response: Transition to conclusion of interview – this has been addressed. The following language has been added: *All of our central office employees are bound by the same confidentiality rules that I am.*

Tribal TDHE Telephone Interview

Comment: Page 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.

Response: The term “nonprofit organization” was added to item A8 since it is listed in the choices in A9. The term “collaborate with” was added to A8 for clarification.

Comment: Page 7, B8: Add "More funding," or "Increased funding" as a response option.

Response: This is an open-ended question, so respondents can respond that increased access to funding is a priority.

Comment: Section D1 (page 8) — Housing Satisfaction by Program. Correct "CFAS" to read "FCAS."

Response: Section D1 – Housing Satisfaction by Program – CFAS has been corrected to read FCAS

Comment: 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.

Response: We will add a response category for “Other (specify)_____”

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

Comment: 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.

Response: This question has been revised and no longer requires a number. It now reads, "To your knowledge, has the number on the waiting list increased, decreased, or stayed about the same in the past 3 years? Regarding the comment about gathering information for the interview, the instrument has been revised and does not request specific numbers from the respondent.

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

Comment: 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.

Response: The questions in this section recognize that leveraging has increased and may take many forms. Question F1 lists many groups that the tribe may consult with for planning. Question F8 asks about involvement of housing subsidies other than IHBG and involvement of private developers who invested their own capital. Question F10 asks about barriers to developing projects that involve other subsidy programs.

Comment: Page 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.

Response: This is very helpful information. One reason for the 24 site visits is to obtain information on these nuances that cannot easily be captured in a survey.

Comment: Page. 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.

Response: We will add an explanation to F3 that indicates this would include use of an assessment provided by that state agency.

Comment: 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.

Response: Comment on page 14, F4 - We will add a response option "do not work outside of the tribal area boundaries."

Section G, Challenges in Housing Development and Operation:

Comment: 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 and 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.

Response: HUD thinks that tribes will vary in what they identify as major challenges or obstacles and that the use of other (specify) will enable tribes to indicate what these issues are. The site visits will further explore the these challenge.

Comment: 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.

Response: We have added a response option "Other (specify)_____". Also, the response option "Transport and delivery of construction/housing materials" was added to G3 regarding factors that lengthen the time it takes to develop new housing in this reservation/area.

Section H, Assessment of Rules and Procedures under NAHASDA:

Comment: Page 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.

Response: Since the passage of NAHASDA in 1996 fundamentally changed the way federal funding is delivered to tribal people, HUD is interested in hearing from respondents who are familiar with pre-NAHASDA program operations as well as current operations.

Comment: Page 22, J3: In this question relating to barriers to applying for mortgages, please add "insufficient income."

Response: Comment on page 22, J3 – We will add "insufficient income" as a response choice.

In person interview guides

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

Response: Selection of interviewees – Contact will be made very early in the outreach efforts for the sites selected for the TDHE interviews. The people interviewed on behalf of the tribes/TDHEs will be selected based on the recommendations of our points of contact and tribal leaders' suggestions. Respondents will vary in each site depending upon the tribal organization and administration of the NAHASDA grant and other tribal housing activities.

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.

Response: The wording will be tailored to state "reservation," "tribal area," "village," "Rancheria," or other term, as appropriate, for each location visited. The outreach to tribes selected for the study will address this issue and instruments will be revised accordingly.

Lender Telephone Interview Guide

Comment: 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 Low-Income Housing Tax Credit (LIHTC) transactions, a primary development funding source for many housing units built for Native American families.

Response: The focus of the lender survey is home purchase mortgage lending. As a result, questions about sources and availability of affordable housing development funding, such as Title VI or LIHTC, are not included.

Native CDFI and Tribe Owned Credit Union Telephone Interview Guide

Comment: 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.

Response: We agree. In addition to approved section 184 lenders, the survey will include lenders from each of the following categories: tribe-owned credit unions; Native American CDFIs; and lenders using funds financed through state housing finance agency (HFA) initiatives.

Study of Native Americans living in urban areas

Comment: 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.

Response: Thank you for your input and support of this study component

Comments (regarding the use of the phrases “reservations,” “tribal areas,” “tribal lands,” “res,” and similar terms):

Page. 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?"

Page. 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?"

Page. 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?"

Page. 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

Page. 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.
Page. 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.

Response: the wording will be tailored to state "reservation," "tribal area," "village," "Rancheria," or other term, as appropriate, for each location visited. The outreach to tribes selected for the study will address this issue and instruments will revised accordingly.

Again, we would like to thank you for your thoughtful comments. If you have further questions or comments, please do not hesitate to Jennifer Stoloff (Jennifer.A.Stoloff@hud.gov, 202.401.5723).

Sincerely,



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