



OFFICE OF POLICY DEVELOPMENT
AND RESEARCH

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

August 11, 2011

Ms. Carol Gore
President/CEO
Cook Inlet Housing Authority
3510 Spenard Road, Suite 100
Anchorage, AK 99503

Dear Ms. Gore:

Thank you for your recent submission of comments regarding the Federal Register Notice (FR-5486-N-11) regarding the proposed information collection for HUD's Assessment of Native American, Alaska Native and Native Hawaiian Housing Needs. We have carefully considered all of your comments and suggestions. Our specific responses 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: Section H2 (page 31) — Maintenance Performance of Tribes and TDHEs. 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.

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

Part I, Household Income and Housing Costs

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: 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.*

Tribe/TDHE Telephone Interview

Part A, Tribal/TDHE Organization and Institutional Relationships:

Comment: Section A8 (page 4) — Partnering. The use of the term "partner" is confusing. In this context, what type of relationship does the term imply? Funder/grantee? Co-providers of the same program? Referrals? Would be helpful to know how "partner" is defined or exactly what this question is looking for in the way of a response. Also, there is no opportunity to explain partnerships with non-public entities, such as non-profit organizations.

Response: The term “nonprofit organization” was added to item A.8 since it is listed in the choices in A9. The term “collaborate with” was added to A8 for clarification.

Part B, Staff, Training, and Procedures:

Comment: Section B8 (page 7) — Priorities. The question asks, "What do you see as the highest priorities for improving the effectiveness of your organization?" Optional responses include more and better staff training, computer systems, and increased staff size. The question should include as an optional response, "Increased access to funding resources."

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

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

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.

Section G, Challenges in Housing Development and Operation:

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: Section H6 (page 20) — IHBG Rules and Practices. There does not seem to be a logical reason to limit respondents answering this question to those who are familiar with pre-NAHASDA Indian housing programs. Even those unfamiliar with Indian housing pre-NAHASDA can provide thoughtful suggestions regarding how IHBG rules and practices could be changed. However, if the purpose of the Study is to provide a national-level overview of housing needs, it is unclear why there is an entire section dealing with NAHASDA rules and procedures. The questions presented in section H do not tie back directly to the need for housing among Alaska Native and American Indian persons.

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. We see a direct connection between thoughtful improvements in NHASDA rules and procedures and addressing housing needs in an efficient, cost effective, and culturally responsive manner.

In person interview guides

Comment: Selection of Interviewees. Specifically how will interviewees be selected? It will be important to interview both representatives of small tribes/TDHEs and larger tribes and TDHEs that operate a variety of programs.

Response: 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. The research team will confirm the appropriate respondents with each participating tribe during the outreach process. For purposes of developing discussion guides and planning our visits, we group respondents into the following general categories: Tribal Housing Office /TDHE Director; Tribal Leader; Tribal Housing Official or Other Housing Official; Community Leader.

Comment: References to Reservations. Throughout the survey instrument, there are questions requesting information on issues related to those who live "on or off the reservation." However, Alaska has only one small reservation. Alaska Natives live in communities, large and small, throughout the state. The most active providers of Indian Housing are organizations that operate regionally, covering many communities and, collectively, most areas of the state.

Response: The wording will be tailored to state "reservation," "tribal area," "village," "Rancheria," or other term, as appropriate for each location visited. We recognize that broad range of areas are served in Alaska through regional organizations.

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.

Comment: It should be noted that throughout the Study of Native Americans Living in Urban Areas, the instruments reference reservations and tribal lands. These terms do not usually apply in Alaska. More often, interviewees will identify with the term "village" instead of "reservation" or "tribal lands." It may be beneficial to modify the instrument for use in Alaska.

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.

Again, we would like to thank you for your thoughtful comments. We would also like to clarify that the information collection proposed in FR-5486-N-11 is for the purpose of providing a comprehensive overview of housing needs among Native Americans and Alaska Natives. It is not designed or intended for any other purpose.

Sincerely,

A handwritten signature in black ink, appearing to read 'Raphael Bostic', written in a cursive style.

Raphael W. Bostic, Ph.D.
Assistant Secretary for Policy
Development and Research