



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

August 11, 2011

Representative Robert TwoBears, District 5 Legislator
Ho-Chunk Nation Legislature
Executive Offices
PO Box 667
W9814 Airport Road
Black River Falls, WI 54615

Dear Mr. TwoBears:

Thank you for your letter and thoughtful comments regarding FR-05486-N-11, the Notice of Proposed Information Collect on the Assessment of the Native American, Alaska Native and Native Hawaiian Housing Needs.

In this letter, we have reproduced your key comments and followed them with a response. I hope this will address your most pressing concerns.

Comment: I would argue that the sample size then and as proposed now for the upcoming assessment is inadequate. A sample of 40-60 tribes for a study regarding an overall population of 565+ federally recognized tribes may be statistically adequate, but I do not think this takes into account the vast difference that exist in reality between tribes....

Response: Unfortunately, our resources are insufficient to sample larger number of tribes. The current study will include more households at each of the sampled sites and, thus, be more accurate and representative than the last study. The outreach efforts are much more extensive than previously and we anticipate much better participation levels. The sample is not meant to be representative of all the tribes, but, rather of the general living conditions of individual families. We hope to have at least 1,200 completed household surveys, which is a representative sample of AIAN people overall.

Sites will be selected via one integrated probability sample design to produce reliable national estimates. In brief, the design calls for proportional stratification by region and size American Indian and Alaska Native (AIAN population). Within each region, tribal areas will be selected with probability proportionate to size. The sample will be selected from the universe of AIAN tribal areas as identified and defined by the U.S. Bureau of the Census as of 2010, consistent with applicable law.

The sample design will yield reliable measures of housing need and conditions such as overcrowding, homelessness, adequacy of infrastructure (e.g., sanitation, electricity), types of financing available and used, and rent burden/cost—as well as information on factors likely to be associated with variations in these measures.

Comment: A secondary concern that I would like to express has to do with the use of outside consultants. Although likely unavoidable, using non-native outside consultant to conduct field interviews, especially with individual tribal members I believe, has the potential to degrade the information that is gathered....

Response: The research team will make every effort to recruit tribal interviewers within the designated tribal areas included in the sample. We understand that it is important to show respect for tribal sovereignty in the research process, build tribal capacity for data collection, and ensure cultural competency in conducting the household survey. Suggestions for recruitment and approval for any hiring activities will be sought from each tribe. In addition, the research team will keep tribal contacts informed of all recruiting activities and regular updates will be provided.

Comment: Potential Solution: Self-Assessment. If the goal of the upcoming assessment is to get an accurate picture of tribal housing needs, then there should be serious consideration of allowing tribes to participate in the study by self-assessing with technical assistance from HUD. There are many tribal governments and tribal housing authorities that are perfectly capable and arguably better situated to assess what the needs are of those tribal members they serve.

Response: HUD is planning to do a web-based survey of all tribes/TDHEs as part of the study. The web survey will be for the tribes that were not included in the telephone or in-person versions of the tribal/TDHE surveys. In addition, any tribe not included in our random sample that would like to conduct the household survey in their area, should contact HUD about how best to proceed. If any tribe decides they would like to do this, we will help facilitate the process, though our resources are limited. This would be another way to contribute information to the assessment.

Again, we would like to thank you for taking the time to share your thoughts on this important study.

Sincerely,



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