



June 30, 2011

Reports Liaison Officer
Office of Policy Development
Department of Housing and Urban Development
451 Seventh Street, SW, Room 8230
Washington, DC 20410

RE: Notice of Proposed Information Collection for Public Comment on the Assessment of Native American, Alaska Native and Native Hawaiian Housing Needs [FR05486-N-11]

To Whom It May Concern,

As a member of the Ho-Chunk Nation Legislature, I believe that an assessment of tribal housing needs is a welcome undertaking and the Ho-Chunk Nation fully supports these efforts. I have been actively engaged in American Indian housing issues focusing lately on the process currently underway at Housing and Urban Development (HUD) to develop and implement a tribal housing needs assessment. In my analysis of the proposed Assessment of Native American, Alaska Native and Native Hawaiian Housing Needs, I have identified some concerns with regard to the sample size and survey methodology, and ways to address these concerns.

The Ho-Chunk Nation is a federally-recognized Indian tribe whose membership is located throughout various Wisconsin counties and the United States. The Nation is composed of four branches of government: the General Council, the Legislature, Executive, and Judiciary. The Nation's Legislature is the governing body and is composed of thirteen (13) elected members, representing five (5) Districts including Wisconsin and outside the State. The Nation's Executive Branch is administered by an elected President, and includes twelve (12) Executive Departments charged with enforcing the Nation's laws and policies to provide essential services to members including housing. The Ho-Chunk Nation, like all American Indian Nations, is distinct with its own governing structure, culture and language and consequently unique housing needs.

Concerns with Sample Size/Methodology

The last tribal housing needs assessment was completed in 1996 and some of the experiences during that process should be used in preparation for the current assessment. The 1996 study used a “*representative sample of 36 reservations and other Tribal Areas.*” It is my understanding that during the survey process which included field interviews with Indian Housing Authorities and individual tribal households, a number of tribes dropped out of the study or limited participation to varying degrees. The result being an uncertainty as to the actual sample size and thus a question as to its accuracy.

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 differences that exist in reality between tribes. One only needs to look at, for example, the Navajo Nation in the desert Southwest and the Shakopee Mdewakanton Sioux Community near my home in Minnesota to understand the differences in population and resources that exist. Population and resources are only two of many factors that create disparities and differences between tribes when considering housing needs. Having recently dealt firsthand with a late March blizzard, I can attest to climate being probably one of the biggest factors that impacts housing needs for tribes.

A secondary concern that I would like to express has to do with use of outside consultants. Although likely unavoidable, using non-native outside consultants to conduct field interviews, especially with individual tribal members I believe, has the potential to degrade the information that is gathered. My personal belief is that many tribal members will not be completely forthright with those conducting the survey because of unease dealing with someone who is not native.

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.

I believe designing a study to allow tribes to self-assess will increase participation and allow for more accurate information to be collected. I also believe that allowing tribes to self-assess is in line with self determination and self governance.

Thank you very much for your time and consideration of this issue. If you need any further information please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert TwoBears". The signature is fluid and cursive, with the first name "Robert" and last name "TwoBears" clearly distinguishable.

Representative Robert TwoBears

District 5 Legislator

Ho-Chunk Nation

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