



Housing Authority of The Choctaw Nation of Oklahoma

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Regulations Division, Office of General Counsel
Department of Housing and Urban Development
451th Street SE. Room, 10276
Washington, DC 204010-0500

RE: Docket No. FR-56560-N-08; HUD-2014-0079-0001
Native American Housing Assistance and Self Determination Act of 1996: Request for Information

To the Negotiated Rulemaking Committee

It was agreed upon by the original IHBG Negotiated Rulemaking Committee and the IHBG Formula Committee that formulated the proposed rule of comment, that the use of the census as a means of counting and identifying specific populations is the most useful tool available. This was based on the conclusion that census is the most comprehensively and consistently conducted data gathering methodology nationally that captures the most accurate reflection of the population within IHBG formula areas and includes all tribal affiliations.

In the manner of the previous Decennial Census, the ACS is collected by the Department of Commerce, US Census Bureau. Identical data collection is performed across the entire United States, which is unlike any other available data source. The ACS is the only data method currently available that achieves the optimal balance of: 1) Acknowledgement of actual Tribal needs; 2) Equity among Tribes; 3) Minimal disruption of tribal housing programs; 4) Acknowledgment of tribal sovereignty; and 5) Practicality, including cost.

While no data collection system is perfect, the greatest return on investment of any time, energy and money to achieve enhancements of data collection would be through collaborative efforts of the Tribes, HUD and the Census Bureau to optimize the ACS, rather than attempt to create a completely new process.

We believe that on behalf of the tribe we serve and in the interest of assuring consistent and fair availability of vitally important aid, we request that further efforts at data collection improvement remain focused on the current ACS method, and that the Tribes who rely on the IHBG program would be engaged in any reforms alongside HUD and the Census Bureau.

Sincerely,

Russell Sossamon
Executive Director
Housing Authority of the Choctaw Nation of Oklahoma

Choctaws...growing with pride, hope, and success!