

**IHBG Negotiated Rulemaking Data
Study Group
Final Report**

Report Summary
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Policy Development and Research

Overview

- “ Recommendations
- “ Process
 - . Guiding Principles
 - . Rules of Order
- “ Nominated Data Sources
- “ Characterization
- “ Evaluation
- “ Recommendations and non-consensus items

Two Recommendations

1. The **AIAN population** will be the greater of the most recently available ACS, Decennial Census, or Challenge data.
 - 1a. Committee to discuss whether or not to exclude South, Central, and Canadian AIAN from the Decennial Census and the ACS
2. **Total Development Cost, Tribal Enrollment, and Formula Response Form** to be used as they are presently used in the formula

Negotiated Rulemaking Committee Guiding Principles for the Study Group

IHBG Negotiated Rulemaking Committee established the study group guiding principles on 7-30-14, to look for data source(s) that achieve an optimal balance of:

- ~ Providing data that is relevant to AIAN housing needs
- ~ Having a data collection methodology that is objective, equitable, transparent, consistent, statistically reliable, and replicable both over time and diverse geographies
- ~ Being collected by proficient persons/organizations having appropriate capacity and training
- ~ Being collected on a recurring basis at reasonable intervals or being capable of reliable statistical aging
- ~ Not imposing an undue administrative or financial burden upon tribes and TDHES
- ~ Implementable by FY 2018

Study Group Members

- ~ **Heather Cloud**, Eastern Woodlands Region: Ho-Chunk Nation
- ~ **Jason Adams**, Northern Plains Region: Salish & Kootenai Housing Authority
- ~ **Gary Cooper**, Southern Plains Region: Cherokee Nation (Study Group Chair)
- ~ **Karin Foster**, Northwest Region: Yakama Nation Housing Authority
- ~ **Deirdre Flood**, Southwest Region: Washoe Housing Authority
- ~ **Carol Gore**, Alaska Region: Cook Inlet Housing Authority
- ~ **Glenda Green**, HUD: Office of Native American Programs

Technical Experts

- ~ **Jim Anderson** (Alaska, Eastern Woodlands, Southern Plains, and Southwest Regions)*
- ~ **Kevin Klingbeil** (Northern Plains Region)
- ~ **Patricia (Pat) Boydston** (Northwest Region)
- ~ **Ben Winter** (HUD); replaced by **Todd Richardson** (HUD)

***Gabe Layman** temporarily served as a technical expert until the Alaska, Eastern Woodlands, Southern Plains, and Southwest regions nominated Jim Anderson as a technical expert for their regions

Study Group established Rules of Order (9-19-2014)

- “ Meetings open to all (24 total meetings: 3 in-person; 21 telephone)
- “ Provide meeting notices on the IHBG website.
- “ Most meetings held by telephone with a call in number posted on the IHBG website.
- “ Minutes maintained by a HUD provided note-taker.
- “ Study Group members could post documents on the IHBG website
- “ Followed the Proposal Concept process used in the Needs Work Group of the Full Committee

Data Source Nominations

- “ Federal Register Notice seeking nominations (9-25-2014). Deadline for submission 10-27-2014.
- “ 49 total nominations were received (see Section 6 of the Study Group report)

Initial Screening

- “ The nominations were screened using the following questions:
 - . Is it an independent, verifiable data source or a repackaging/special tabulation of some other data?
 - “ If the data source is not independent, stop and consider the source it is based on instead.
 - . Is this data collection project active or is it a proposed new data source?
 - “ If the data source is no longer being collected and cannot be reliably enhanced to bring current, reject it.
 - . Does this source measure some aspect of Indian housing need? If yes, what aspect(s)?
 - “ If the data source does not include any data relevant to Indian housing need, reject it.
 - . Is the project national in scope, collecting data and estimating values for all Indian areas?
 - “ If not currently or potentially national, reject it.
- “ The Data Study Group agreed unanimously that 30* of the 49 nominated data sources did not meet these criteria (see Section 8 of the Study Group Report).

* See footnote 1 in Section 8 of the report for further clarification on 4 of the nominated sources.

Data Characterization

- “ The technical experts prepared detailed characterizations of the remaining 19 data sources.
- “ The data characterization questions addressed:
 - . purpose and methodology,
 - . accuracy and precision,
 - . implementation and funding,
 - . transparency and potential for challenge and
 - . other potential concerns.
- “ Of the 19 data sources reviewed in the characterization phase, the study group agreed that **nine** should be moved on for further evaluation (see Section 8)

Evaluation Phase

- “ Core Data:
 - . Most Recent Decennial Census, US Census Bureau
 - . Most Recent ACS, US Census Bureau
 - . National Tribal Survey to be Administered by a Federal Agency
 - . National Tribal Survey to be Administered by Tribes
- “ Support Data:
 - . Tribal Enrollment Data
 - . IHS Population Projections
 - . US Census Bureau Population Estimates
 - . Data Reported by IHBG Grant Recipients on Formula Response Form
 - . Total Development Cost (TDC)

Evaluation Criteria

- “ Relevance (4 questions)
- “ Currency (3 questions)
- “ Accuracy and Precision (6 questions)
- “ Completeness (3 questions)
- “ Availability (4 questions)
- “ Transparency (2 questions)
- “ Overall rating (2 questions)

Core Data – Decennial Census

How Used Currently: This is used for the count of AIAN persons

What might it be used for: Same

Major Caveats: Undercount in some areas; definition of Native American not limited to IHBG eligible tribes and/or US tribal members

Overall Ratings: Excellent, Good

- . Relevancy: Excellent, Good
- . Currency: Fair
- . Accuracy and Precision: Excellent, Good
- . Completeness: Excellent, Good
- . Availability: Excellent
- . Transparency: Excellent, Good

Core Data – American Community Survey

How Used Currently: Not currently used

What might it be used for: To replace the Census 2000 long form needs data

Major Caveats: Small sample sizes in some areas; undercount in some areas; definition of Native American not limited to IHBG eligible tribes and/or US tribal members

Overall Ratings: Good

- . Relevancy: Excellent, Good
- . Currency: Good
- . Accuracy and Precision: Excellent, Good, Good to Fair
- . Completeness: Excellent, Good, Good to Fair
- . Availability: Excellent
- . Transparency: Excellent, Good

Core Data – National Tribal Survey Federally Administered

How Used Currently: Not currently used

What might it be used for: To replace the Census 2000 population and long form needs data

Major Caveats: Does not currently exist; time to develop, high cost to undertake, including administrative burden to tribes

Overall Ratings: Good, Fair to Poor

- . Relevancy: Excellent, Fair, Unknown
- . Currency: Good
- . Accuracy and Precision: Good to Excellent, Fair, Unknown
- . Completeness: Excellent, Unknown
- . Availability: Fair/Poor
- . Transparency: Assumed Excellent

Core Data – National Tribal Survey Tribally Administered

How Used Currently: The proposed survey anticipates the possibility of developing new IHBG formula variables and new survey questions. (Note, tribes may currently challenge the Census data with their own survey, which must effectively ask questions which mirror the Census.)

What might it be used for: To replace the Census 2000 population and long form needs data

Major Caveats: Does not currently exist; time to develop, high cost to undertake, including administrative burden to tribes; would be difficult to ensure uniform data collection across all tribal areas.

- ~ **Overall Ratings:** Good, Fair
 - . Relevancy: Excellent, Unknown
 - . Currency: Good
 - . Accuracy and Precision: Excellent, Fair, Unknown
 - . Completeness: Excellent, Fair, Unknown
 - . Availability: Fair/Poor
 - . Transparency: Assumed Excellent

Support Data – Tribal Enrollment Data

How Used Currently: This is currently used to cap the needs data so tribes can't receive funding for more than 2 times their enrolled population.

What might it be used for: As a variable itself; if enrollment data is available for the tribe's service area, then it could be used to (i) replace the Census AIAN population count; or (ii) be used to reweight the ACS/Tribal Survey data

Major Caveats: Not currently available distinguishing enrolled members in tribal service area versus outside of service area. Tribes would have to agree on consistent data to be included in enrollment records, and a process for keeping data current.

- ~ **Overall Ratings:** Poor, but could be made Excellent
 - . Relevancy: Fair, Poor, Good, Excellent
 - . Currency: Excellent
 - . Accuracy and Precision: Fair, Excellent
 - . Completeness: Fair, Excellent
 - . Availability: Excellent and Poor
 - . Transparency: Excellent to Good

Support Data – IHS Population Projections

How Used Currently: This is currently used in the formula to "age" the needs data to account for population births and deaths since 2000

What might it be used for: Same

Major Caveats: Built on Census 2000 base; does not account for migration; underreporting of births and deaths.

- ~ **Overall Ratings:** Fair
 - . Relevancy: Fair, Fair/Good
 - . Currency: Poor
 - . Accuracy and Precision: Fair, Good
 - . Completeness: Fair, Good
 - . Availability: Excellent
 - . Transparency: Good

Support Data – US Census Bureau Population Estimates

How Used Currently: None

What might it be used for: To "age" the needs data of formula areas based upon births, deaths, and migration in the formula area counties since the Decennial Census (or other survey date).

Major Caveats: It is calculated for counties, not for AIAN areas; it estimates total county population and then county AIAN population a year later.

~ **Overall Ratings:** Fair, Excellent

- . Relevancy: Fair, Good, Excellent
- . Currency: Excellent/Good
- . Accuracy and Precision: Fair, Good, Excellent
- . Completeness: Fair, Good, Excellent
- . Availability: Excellent
- . Transparency: Fair, Excellent

Support Data – Total Development Cost

How Used Currently: This is currently used in both the needs formula and FCAS to adjust grants so that higher cost places (places with higher TDC relative to the national average) get relatively more funding per household in need than lower cost places.

What might it be used for: Same

Major Caveats: From private sources without much information on the underlying data; underlying data in tribal areas likely limited.

~ **Overall Ratings:** Good, Fair, Poor

- . Relevancy: Fair, Good, Excellent
- . Currency: Excellent
- . Accuracy and Precision: Unknown
- . Completeness: Poor, Excellent
- . Availability: Excellent
- . Transparency: Poor

Support Data – Formula Response Form

How Used Currently: This is currently used to update counts of Formula Current Assisted Stock units and to verify the geographic housing service area for the tribe being used for the needs data.

What might it be used for: Same

Major Caveats: Self-reported by tribes

~ **Overall Ratings:** Good/Fair

- . Relevancy: Poor, Excellent
- . Currency: Fair/Poor, Good/Excellent
- . Accuracy and Precision: Good
- . Completeness: Poor
- . Availability: Good
- . Transparency: Fair

Recommendation 1

“ The AIAN population will be the greater of the most recently available ACS, Decennial Census, or Challenge data.
 . If this is adopted, the data would no longer be “aged”. Challenge life cycle: ten years.

Recommendation 1a

“ Recommendation for Committee to discuss whether or not to, for IHBG formula purposes, exclude from the count of American Indians and Alaska Natives (AIAN) those respondents who self-identify as having origins in any of the original peoples of South America, Central America and North America outside of the United States.*

*

Recommendation 2

Total Development Cost, Tribal Enrollment, and Formula Response Form to be used as they are presently used in the formula

Non-consensus item 1

Development of both Federally Administered and Tribally Administered National Tribal Surveys. The proposal was that the Committee recommend to the U.S. Department of Housing and Urban Development (HUD) and Congress to develop both surveys. A Tribal Survey that is focused on Indian housing need would provide data that is tribal specific and allow for tribes to structure the survey and be intricately involved in the process to provide data for their housing program. This proposal envisions using a temporary/interim data source as determined by the full Committee, and then implementing the new Tribal Survey as soon as it becomes available.

Seven horizontal lines for notes.

Non-consensus item 2

Feasibility Study for National Tribal Survey. This proposal would request that HUD conduct a study on the feasibility and cost related to replacing the Decennial Census and the ACS with a National Tribal Survey for use in the IHBG funding formula. The study conducted by HUD should, at a minimum, determine the cost to develop and implement a National Tribal Survey, identify funding sources to pay for the additional cost, evaluate the capability of tribes to administer the Survey and determine the extent that a National Tribal Survey would duplicate efforts already being done by the U.S. Census Bureau. The study should be completed within the next three years, and the information from the study should be considered by any future Negotiated Rulemaking Committee tasked with developing regulatory changes to the funding formula for the IHBG.

Seven horizontal lines for notes.

Non-consensus item 3

Other remaining variables. There were two proposals for Data Study Group recommendations were considered, but neither achieved consensus. The first proposal was to recommend one of the three options below for full Committee consideration, and the second was to present the options listed below for the full Committee to discuss. For all options, recommendation 1 for the AIAN Persons variable (see above) would apply.
Option 1: Status quo, apply 2000 Decennial aged. (Option 1a. Apply 2000 Decennial aged until the Committee changes the variables to match the questions in the ACS).
Option 2: use ACS five-year rolling average, updated annually, as the core data on the remaining variables; adjust all of the variables upward if the ratio of AIAN population from recommendation 1 is greater than the ACS AIAN population.
Option 3: use ACS five-year rolling average, updated annually, as the Core data on the remaining variables with no adjustment factor.

Seven horizontal lines for notes.