

Methodology for Assigning Formula Areas

Background

All Needs data are assigned to tribes based on Formula Area geography. All Formula Areas currently follow standard Census boundaries. When the program started in 1998, all Formula Area assignments consisted of either:

- Indian Lands – including Reservation and Trust Lands.
- Balance of counties – that is all land in a county excluding Indian lands.

After the Formula Negotiated Rulemaking ending in 2005, the regulations were modified to allow Formula Area additions using the smaller Census geographies of- tracts or county subdivisions whichever are smaller(24 CFR 1000.302 Formula Area 2 (iv)). In recent years, some additions to Formula Areas have been made using these smaller units of geography. Also, if Near Reservation Service Areas (NRSA) are specified in terms of a community rather than a county, maps are overlaid that show place and tract/subdivision boundaries and assign tracts or subdivisions that encompass the named place.

How Populations were Assigned to each Tribe

The American Community Survey (ACS) and Census data geographic levels that were used to compare Indian Housing Block Grant (IHBG) formula allocations simulations based on 2000 Census data projected with Indian Health Service birth and death rate model with such allocations based on 2010 population data and ACS data for the other 6 Needs variables were:

- All Indian lands subdivided into county areas, (Summary Level (SL) 282)
- Counties (Summary Level 050)
- Alaska Native Regional Corporations (ANRC) (SL 230)
- Census tracts (SL 140)
- Indian lands subdivided into tracts (SL 144).

The Indian lands SL 282 file was the basis on which to construct the formula data files. The Indian lands data was then aggregated to the county level which was then subtracted from the county level files to create needs counts for “balance of county” areas. This provided the building blocks needed for almost all tribes in the lower 48 states.

The data needed for Formula Areas assigned based on tracts were then identified following a similar procedure but using SL 144 Indian Lands Subdivided into tracts and SL 140 Census tracts. The Indian Lands by tract were then aggregated to the tract level which was then subtracted from the tract level

files in SL 140 Census tracts to create needs counts for “balance of tract” areas. Those tracts which are parts of Formula Areas are then added as a line to our formula Census file and the needs totals in those assigned tracts are subtracted from the “balance of county” line to ensure that there is no double counting of needs.

For purposes of the simulation, access to special tabulations for county subdivisions was not available. As a result, data was approximated for one tribe, St. Croix Chippewa, which has a small Formula Area addition based on county subdivisions. Instead, an estimate was developed using the percentage of the balance of county which was included in the relevant subdivision in the last Census and applied to the new Needs data associated with that subdivision.

Alaska Specific Formula Area

For Alaska, the SL 282 data for all of the Alaska Native Villages was included. Each of these is assigned to an ANRC (or regional tribe). In addition, some native villages are assigned Formula Area as the balance of an Alaska borough. If so, these needs are also identified as separate formula geographies. The total needs of all villages within an Alaska region are then subtracted from the totals reported for the ANRCs (SL230) to determine which Needs are to be assigned to the regional tribes.¹

Requested Alaska Example

Douglas is a native village identified in the Census SL282 files by the American Indian and Alaska Native (AIAN) code 6420 as part of Juneau City and Borough (st2, cnty110). The Decennial Census reported 972 AIAN alone or in combination with other races living there. Please note that in Fiscal Year (FY) 2003 the Formula Area for Douglas was changed to include a smaller portion of Douglas Island and the balance of the data was assigned to Tlingit-Haida as a consequence of a successful Census data challenge. However, this was not maintained in the ACS simulation, as HUD's letter accepting this change stated that if the Tribe reverted back to Census data, rather than utilizing the data from a Census challenge, HUD would revert to the Census boundaries for both Douglas and Tlingit-Haida. Since in the ACS simulation, all data based on old Census challenges was replaced with new data, the Formula Area for Douglas became the Alaska Native Village Statistical Area (ANVSA) as defined by Census in conjunction with the tribe.

Tlingit-Haida's total is derived from counts for ANRCs. The SL 230 tabulations show 15,731 AIAN alone or in combination persons living within Sea Alaska boundaries. From this total, the population assigned to all of the villages (10,239) was subtracted to obtain a total of 5,492 living in the balance of Sea Alaska. These needs were assigned to Tlingi- Haida as the regional tribe.

¹ We rely on the Census to define the boundaries of Alaska Native Villages. The regulations specify that if Census boundaries exceed the actual geographic area of the village, they may be challenged pursuant to Sec. 1000.327. When Census data are obtained, we do examine boundaries, unless challenges are lodged.014

Other Alaska Anomalies

In the FY 2014 IHBG final formula allocation data files, Sitka is assigned the balance of Sitka City and borough, not a Sitka ANVSA. However, the 2010 Census and the ACS has a separate line for Sitka named the Sitka ANVSA. Therefore, Sitka was assigned the new Sitka ANVSA geography as well as the balance of Sitka City and borough based on prior similar assignments for consistency.

In the FY 2014 IHBG final formula allocation data files, Skagway is assigned the balance of Skagway-Hoonah-Angoon. However, the 2010 Census and the ACS data separated this borough into ANVSA and Hoonah-Angoon. While there is a separate Skagway ANVSA line, for consistency, Skagway continues to be assigned the balance of Hoonah-Angoon which has 112 AIAN residents. Most of the residents of Hoonah Angoon are part of Hoonah or Angoon ANVSA counts.