

## Needs Work Group

**DRAFT**

9/25/2014

### Discussion Priorities

1. Review of Statute and Requirements
2. Data Sources
3. Variables
4. Minimum Funding
5. Revise and Refine: Definitions and Amending the definition of formula median income to allow use of national median income

### Brainstorming Data Options

1. Status Quo / Blended with ACS : "Better of" (quad option)
2. ACS (updated status quo)
3. ACS / Tribal Enrollment Data
4. New Survey
5. Work with Census to clarify questions
6. ACS using self reported tribal affiliation

Data Sources	Pros	Cons	Mitigation to Con
1. Status Quo / Blended with ACS : "Better of" (quad option)	-Helps mitigate some of the loss	-Complexity makes it less transparent and more difficult to explain	-Build in a sunset clause
2. ACS & Decennial 2010 Census (updated status quo)	-ACS data can be used now for analysis	-Legitimate concern that ACS is not reflective of true need -Under counting of rural areas -Difference between geographic areas sampled by ACS and IHBG formula area -Restriction of "formula area" for urban tribes and tribal members living outside the tribal reservation areas -Is the sampling size too small -Small sampling process misses a lot of individuals -Recognized parts of tribe/colonies outside service area -Concern that these are 5 year estimates and the data are not current	-Convene a panel or request a research study for recommendations for the next Negotiated Rulemaking; possibly propose new regulations to ensure this will occur -Tweak formula variables to target towards need -Tracking the number and amount of loss -Cap on the burden put on tribes -Census challenges to the formula. If census challenges to the formula are not accessible to all tribes, then that is something that needs to be mitigated -ACS does oversample small areas
3. Using Tribal Enrollment to tweak ACS and Decennial Census	-We can do runs with this option right now -Tribes keep track of tribal enrollment -Tribal enrollment is a sovereign decision	-Tribal enrollment not current -Enrollment criteria not the same across the country, i.e., not consistent -Multiple tribal enrollment (?) -Enrollment, but not in tribal service area	
4. New Survey -Commerce -Tribal controlled survey	-We have legislative authority to do a new survey	-Will take a long time and will not be able to make decisions for the current Negotiated Rulemaking process	-Not fair to fund new survey from IHBG
5. Work with Census to clarify questions	-HUD can clarify federal need & so can Tribal governments (through the interagency committee)		
6. ACS using self reported tribal affiliation		-Tribal recognition does not work for every place because not all affiliations are federally recognized	
7. Information from Environmental Review			