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## CITIZEN POTAWATOMI NATION

October 27, 2014

Rodger Boyd  
Deputy Asst. Secretary, Native American Programs  
Office of Public and Indian Housing,  
Department of Housing and Urban Development (HUD)  
451 7th Street SW, Room 4126,  
Washington, DC 20410

Re: Comments to Docket # FR-5650-M-08 by the Citizen Potawatomi Nation via  
[www.regulations.gov](http://www.regulations.gov)

Dear Mr. Boyd:

Please accept these comments from the Citizen Potawatomi Nation (CPN or Nation), regarding the HUD Request for Information for Native American Housing Assistance and Self-Determination Act of 1996. The Citizen Potawatomi Nation has closely reviewed the proposed guidance. We were pleased to see that some of the concerns we have with the data used for the Needs formula are shared by the Negotiated Rule-Making Committee and their appointed "Study Group" and that they are seeking input regarding this topic to address AI/AN housing needs. Utilizing a data collection methodology that is objective, equitable, transparent, consistent, capable of being applied to all existing formula areas, statistically reliable, and replicable over both time and diverse geographies is a challenge. Because other federal agencies use components of HUD's AI/AN Needs Formula to determine formula funding allocations, we want to ensure the data is as accurate as possible. We recommend the following be considered as the Committee assesses all Needs Formula matters:

### NEEDS VARIABLES

- The Needs Variables should be reevaluated to ensure each data element is a true reflection of current housing needs across Indian Country
- The only accurate population indicator is tribal enrollment data; therefore, the use of national or state-wide tribal enrollment data for population is our recommended alternative to self-reported census data
- Use of ACS data for Needs Variables is problematic because the sampler size is smaller than the Decennial Census sample size. We recommend
  - Developing an ACS socioeconomic survey that specifically targets tribal populations;
  - Increasing the ACS sample size of data collected
- The weight each Needs Variables should be reassessed to ensure an accurate reflection of the housing needs throughout diverse geographies across Indian Country



- AI/AN population needs to be the heaviest weighted factor of the needs variables;
  - tribal enrollment data for population should be considered as an additional needs variable if the population needs data is not given the heaviest weight in the formula;
  - Indian Health Service "User Population" methodology should be considered the primary alternative to tribal enrollment

#### FORMULA CURRENT ASSISTED STOCK (FCAS)

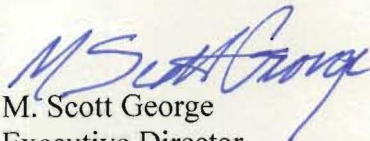
We recommend that HUD more carefully monitors recipient FCAS reports.

#### OVERLAP IN FORMULA AREA

We remain strongly concerned with HUD's current method of allocating Needs data among tribes that share Formula Areas when tribes cannot reach agreement among themselves regarding the source of data to be used. Because so very few tribes can reach agreements when sharing a formula area, the alternative method involves use of the inaccurate Bureau of Indian Affairs (BIA) Total Resident Service Area Indian Population (TRSAIP) data. In January 2014, the BIA published the 2013 Labor Force Report; however, no CPN TRSAIP exists in this report. As the Indian Country Today article entitled "Frustration Surrounds New Tribal Labor Force Report" indicates, many tribes are unhappy with the data published in the 2013 LFR. We believe that use of the TRSAIP should cease. Instead, we suggest using a more accurate population determinant for allocating Needs data among tribes that share Formula Areas like tribal enrollment. In the case of the CPN, national or statewide tribal enrollment would be a better basis of tribal housing need and service capacity rather than the no longer certifiable TRSAIP.

Thank you for the opportunity to respond to this Request for Information. We recommend that the Committee seek additional tribal input once the Study Group determines the best data sources for the IHBG Needs Formula. If you have any questions regarding these comments, please let me know ([sgeorge@potawatomi.org](mailto:sgeorge@potawatomi.org); 405-273-2833).

Sincerely,



M. Scott George

Executive Director

Citizen Potawatomi Nation Housing Authority