

STUDY GROUP OF THE NEEDS WORK GROUP

Guiding Principles

7-30-2014

I. Participation

- a. Attendance at Meetings. Study Group members must make a good faith effort to attend all Study Group meetings (telephonically and face-to-face).
- b. Study Group Members. The Study Group members shall be one Negotiated Rulemaking Committee member from each of the six HUD designated regions, plus one HUD representative.
- c. Participants. All Negotiated Rulemaking Committee Members and other individuals are welcome to participate.
- d. Designated Alternates. A Study Group member may designate an alternate to participate in his or her absence.
- e. Costs. Unless other funding is identified, members of the Study Group, and all other individuals who chose to participate are responsible for their own costs of participation.
- f. Voting. Only the study group members or their alternates shall vote for consensus purposes.
- g. Technical support. The Study Group shall request technical support staff as necessary. The Study Group is unable to compensate technical support staff. A Study Group member elects to make support staff available to the Study Group at his or her own expense. To the extent that any technical request requires funding, the request is subject to funding availability.
- h. The Study Group shall appoint a facilitator and a chair from the study group members.
- i. The regional representatives from each region shall be responsible for communicating the Study Group's progress to tribes and TDHEs within their region.

II. Meetings

- a. Meetings. The first meeting shall occur within two weeks of the formation of the Study group but no later than August 25, 2014. The Study Group will commit to at

least two face-to-face meetings. The Study Group shall also convene telephonically as the group determines necessary.

- b. Chair. The Study Group members shall select a chair to oversee the Study Group meetings.
- c. Working Groups. The Study Group may work as a group of the whole or divide into working groups. Working groups must be chaired by a Study Group participant.
- d. Telephonic Meetings. If the Study Group chooses to divide into working groups, the working groups shall meet telephonically as they deem necessary. The cost of the telephonic meeting, if any, shall be covered by HUD; however, participants shall be responsible for paying their own long-distance telephone charges, if any.

III. Purpose

- a. The purpose of the study is to assess potential data source(s), including ACS, to drive the allocation of Indian Housing Block Grant funding via the IHBG allocation formula.
- b. The Study Group shall attempt to reach a consensus recommendation to the IHBG Formula Negotiated Rulemaking Committee regarding the source(s) of data to be used in the IHBG allocation formula.
- c. The Study Group shall identify and recommend to the IHBG Formula Negotiated Rule Committee additional revisions and modifications to data sources and data sets that would potentially address weaknesses in data sources and data sets, if any.
- d. The study shall examine, but not be limited to: data relevance, data collection methodology, proficiency of persons/organizations collecting the data, timing considerations, the burden imposed upon tribes and TDHEs, cost, and that can be implemented by Fiscal Year (FY) 2018.

IV. Presentation of Product

- a. Upon completion of its work, the Study Group shall distribute its report and recommendations to the IHBG Formula Negotiated Rulemaking Committee. The Study Group shall present its assessment and recommendations to the IHBG Formula Negotiated Rulemaking Committee when it reconvenes.
- b. Upon completion of the Negotiated Rulemaking Committee's negotiation, the report will be made available on the IHBG Rulemaking website and HUD's Codetalk webpage.
- c. The Study Group will provide quarterly updates to the Committee which may include minutes, draft reports, status reports, etc. Within eleven months, a draft report will be provided to the Committee.

V. Data Sources

- a. The Study Group shall identify at the onset of its work a timeline for identifying the potential data sources it will assess in the course of the study. Once the Study Group has identified the data sources it will examine, no other data sources shall be introduced for evaluation.
- b. Data sources shall achieve an optimal balance of:
 - 1. Providing data that is relevant to Alaska Native and American Indian housing needs;
 - 2. Having a data collection methodology that is objective, equitable, transparent, consistent, statistically reliable, and replicable both over time and diverse geographies;
 - 3. Being collected by proficient persons/organizations having appropriate capacity and training;
 - 4. Being collected on a recurring basis at reasonable intervals or be capable of reliable statistical aging;
 - 5. Not imposing an undue administrative or financial burden upon tribes and TDHEs; and
 - 6. Being cost effective
 - 7. The timeframe within which the data source can be implemented.
- c. The Study Group shall develop and utilize standard questions and criteria to assess each potential data source.

VI. Duration of this Study

- a. The Study Group shall have no more than 12 months from the first meeting of the Study Group to complete the study and submit the final report to the Negotiated Rulemaking Committee.
- b. Should the Study Group sub-divide in smaller working groups, all research shall be brought back to the Study Group for evaluation and assessment within 6 months of the Study Group formation.

The Study Group, by consensus, will make a recommendation to the Negotiated Rulemaking Committee.

Attachment: Proposal Concept from the Needs Work Group to Full Committee and approved by the Committee on June 13, 2014

June 13, 2014

Proposal Concept from the Needs Work Group to Full Committee:

APPROVED BY COMMITTEE 10:40AM

Delay implementation of any new data source for FY 16-17 allocation until completion of a study by a study group of this committee, not to exceed 12 months, of all relevant data sources, including ACS and for each data source, how each might be used or modified to be used as a data source for the IHBG. Commencing in FY 2018, the introduction of a new data source may not result in any Tribe receiving less than 90% of its prior Fiscal Year Needs portion of the grant; provided, however, that any Tribe is subject to any proportional reduction that all Tribes are subject to in the event of a shortfall in the total amount available for Needs. At the conclusion of the study, the current Negotiated Rulemaking Committee will review study findings to consider alternate data sources.

The study group, by consensus, will recommend to the current Negotiated Rulemaking Committee a Needs data source and method of introducing that data source which achieves an optimal balance of:

1. Recognition of actual Tribal needs
2. Equity among Tribes
3. Minimizing disruption of tribal housing programs
4. Recognition of tribal sovereignty, and
5. Practicality, including cost