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"For the People"

Public Service Announcement

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Tohono O'odham Census Challenge Prevents Loss of Millions in Housing Funding

The Tohono O'odham Nation was recently informed by the U.S. Department of Housing and Urban Development (HUD) that HUD had reviewed and accepted the population and housing needs data collected by local staff during the "Tohono O'odham Census Challenge" project, which the Nation submitted to HUD in order challenge and replace the Census data used to determine the Nation's tribal housing funding allocation, and that use of this new data in the funding formula would restore a total of over \$4 million in housing funding to the Nation over a period of five years. According to the Nation's Chairman, Edward D. Manuel, "When faced with the prospect of losing almost \$1 million per year in desperately needed housing funding, TOKA (the Nation's housing entity) and the Nation knew they needed to act. Restoring this funding, and empowering our own people to correct the data describing our households and our living conditions, allows us to come closer to meeting our current needs while also enabling us to better plan for and protect future generations. In responding to this problem in a thoughtful and community-focused way, the proactive and inclusive approach adopted by TOKA and the others leading this effort left us two steps ahead of where we were when we began this effort. Our job now is to learn from this information and actively use it to help our people."

As a result of the HUD's adoption and publication of a final rule on November 22, 2016 incorporating new federal data sources into the Indian Housing Block Grant (IHBG) formula, the Tohono O'odham Nation ("the Nation") was slated to lose over \$900,000 per year in needs-based IHBG funding beginning in Fiscal Year (FY) 2018. However, the Nation believed that the needs of its people were not accurately reflected in the data collected by the Census Bureau, or in the housing funding allocated based on that data. The Tribal Council authorized the Tohono O'odham Ki:Ki Association (TOKA) to conduct its own household survey in order to more accurately assess the needs of the Nation's communities. After the results of that survey were submitted to HUD in March of 2018 for review and inclusion in the IHBG formula data set, HUD informed the Tribe that it would recover \$941,066 in IHBG funding for FY 2018 and at least \$812,830 for FY 2019. The Nation will also save at least \$800,000 per year for the remaining 3 years of the 5-year lifespan of this data set.

The federal statute that regulates and provides funding for tribal housing programs, the Native American Housing Assistance and Self-Determination Act (NAHASDA), provides a unique mechanism that allows tribes to ask specific questions and follow specific technical and procedural requirements that largely mirror the Census Bureau's questions and process in order to collect data that can be submitted to HUD in order challenge and replace the Census data used to allocate funds via the IHBG formula. This process is commonly referred to as conducting a "census challenge" and the data that tribes are required to collect primarily address household population and income, housing-related expenses, overcrowding and the presence of plumbing or kitchen facilities.

Following the release of IHBG funding estimates for FY 2018, which projected that the Nation would suffer one of the largest tribal losses of needs-based IHBG funding as a result of the change in data sources, the Nation chose to hire Big Water Consulting to help it design and implement the survey and to analyze, report and prepare the data for submission to HUD. In an exercise of the Nation's "data sovereignty" and in their role as forward-looking planners and service providers, the Nation's programs identified additional tribe-specific survey content that would help them better manage and justify their programs and attract additional funding. Enterprise Community Partners agreed to partner with the Nation and TOKA in covering project costs.

To ensure that the project fulfilled its mission of building tribal capacity to collect and utilize data, create local jobs and produce both high quality data and the highest possible response rate, the Nation hired a local survey manager, former Councilwoman Barbara Havier, and 10 local field staff to first map and assess the condition of each housing unit within the Nation's lands. This housing unit map, which can also serve as an emergency response or "9-1-1" map, was then used to draw a random sample of units that field staff would visit to conduct a household survey. In cooperation with Big Water Consulting, the survey manager closely monitored the work of her field staff and the team achieved an incredible 96% response rate.

The Nation's "census challenge" project allowed it to rewrite the story told about its communities through federal data, correct inaccuracies that the Nation believed were leading to an underfunding of its housing program, and build its own capacity to collect and take action based on locally-collected data. Of course, none of these achievements would have been possible without the dedication of the local field staff members and the support of the community members whose honest responses made this project a success! In addition to the census challenge process, the Nation is now working through the various ways in which it will apply the data to better manage the programs that serve its people, develop a strategic plan, attract new funding and design an ongoing tribal data collection program.