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Metlakatla Indian Community

Salish and Kootenai Confederated Tribes

Menominee Tribe

About the cover

The cover was designed and drawn by artist David Gordon. It represents transition from traditional Native American housing to modern housing.

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NAIHC, founded in 1974, is a nonprofit organization that assists tribes and tribal housing agencies in reaching their goals of providing culturally relevant, decent, safe, sanitary, and affordable housing for Native people in Indian communities and Alaska Native villages.

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Executive Summary

President Clinton signed the Native American Housing Assistance and Self-Determination Act of 1996 (NAHASDA) into law on October 26, 1996. This new legislation replaced several separate programs established under previous legislation known as the United States Housing Act of 1937 with a single block grant.

The purpose of NAHASDA is to provide federal assistance for tribes in a manner that recognizes the right of Indian self-determination and tribal self-governance. NAHASDA was implemented through the U.S. Department of Housing and Urban Development (HUD) regulations at Code of Federal Regulations 24 (CFR), part 1000. A negotiated rulemaking committee comprised of 48 tribal representatives and 10 HUD representatives developed these regulations.

There are six eligible housing activities under NAHASDA. These fundable activities are:

- Indian Housing Assistance
- Development
- Housing Services
- Housing Management Services
- Crime Prevention and Safety Activities
- Model Activities

In January 2001, the National American Indian Housing Council (NAIHC) developed a research design plan that was submitted to and approved by the U.S. Department of Housing and Urban Development Research Department. This research design plan was formulated to use a case study approach to examine successful projects carried out under the six general fundable housing activities of NAHASDA. The objective of the research is to provide tribes with information on different approaches and successes in the utilization of NAHASDA for each of the fundable activities under NAHASDA.

The research project was carried out in four phases, with the fourth phase being the final production and distribution of a publication. Special consideration was given to projects that:

- Had significant cultural relevance
- Helped tribes overcome serious obstacles to program implementation
- Provided an increase in housing development
- Exhibited continuity of management
- Provided an increase in community or tribal empowerment

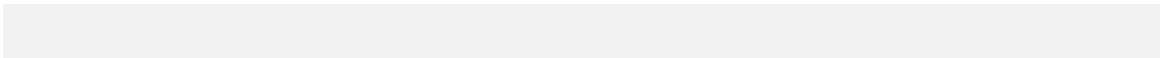
Nominations were received from the HUD area Offices of Native American Programs (ONAP). Upon reviewing the nominations and striving for variation, NAIHC selected six programs, each covering one of the NAHASDA activities, based on the following factors:

- Programs and activities with long term goals and mission statements
- Programs self-governed by the tribe
- Programs with strong community involvement
- Programs that utilized partnerships with entities outside of the tribal jurisdiction as well as leveraging of other resources

The six selected tribes and identified NAHASDA activity are as follows:

- Metlakatla Indian Community - *Indian Housing Assistance*
- Catawba Tribe - *Development*
- White Mountain Apache Tribe - *Housing Services*
- Salish Kootenai Tribe - *Housing Management Services*
- Bay Mills Indian Community - *Model Activities*
- Menominee Tribe - *Crime Prevention and Safety Activities*

This study is divided into several parts including an introduction, background, research methodology, six case studies, and conclusion.



Introduction

The condition of housing continues to be detrimental for Native Americans and Alaska Natives. Functioning with under-developed economies and, in some cases, no developed economies at all, have forced tribes and Alaskan communities to continue to seek funding. Current funding for Indian housing is insufficient to address critical housing shortages. These shortages constitute a common denominator for all Native communities. The complexities of land status and tribal sovereignty continue to make leveraging of federal, state and private sector funds a hardship.

The unique nature of Indian tribes, cultures, and economies, the complexities of land ownership and governmental status, and the relationship between the various federal, state and tribal agencies affect the design, administration and success of tribal programs. Each environment is different and it is important to understand that each is a Nation within a Nation and each has a government-to-government relationship with the United States.

It is within these contexts, and under current legislation, that tribes and Alaska Natives strive to develop sufficient housing programs and provide homes for their people.

BACKGROUND

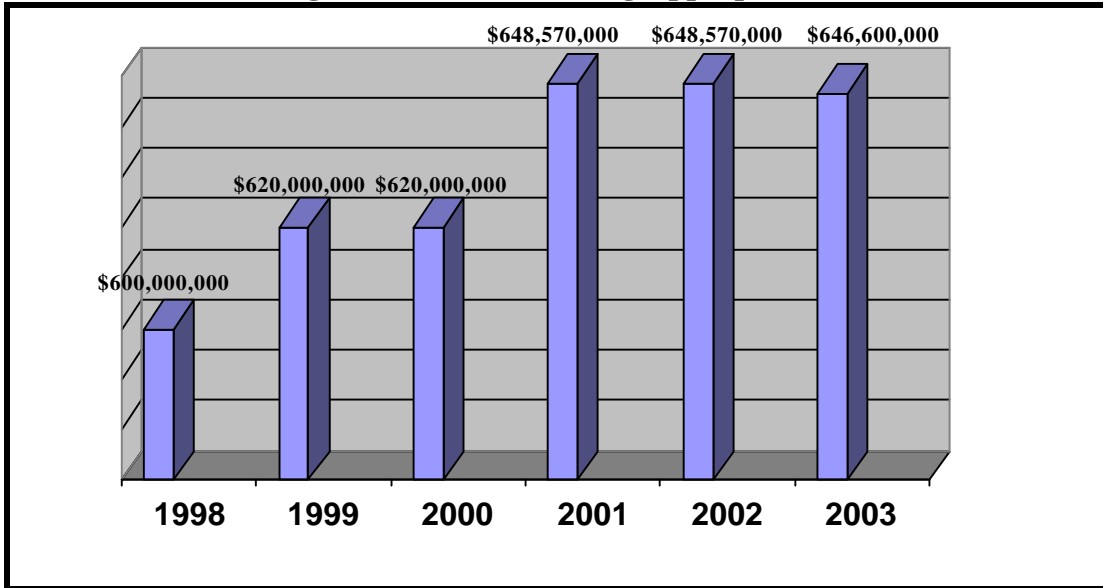
In the mid-1990s, the federal government assessed Native American housing needs and reassessed existing housing programs. On October 26, 1996, President Clinton signed the Native American Housing Assistance and Self-Determination Act of 1996 (NAHASDA) into law. NAHASDA replaced previous legislation relating to Indian housing assistance and balanced the government's trust and treaty responsibilities with the need for tribal control of Indian communities. This new legislation replaced several separate programs of assistance instituted under previous Indian housing legislation, known as the United States Housing Act of 1937, with a single block grant. The three main variables used in determining the amount of the block grant each tribe receives are

- Population
- Housing need
- Current assisted stock

In order to draw down funds for the block grant, tribes are required to complete a five-year plan called the Indian Housing Plan (IHP). The Office of Native American Programs (ONAP) is required to review these plans, provide technical assistance to tribes when necessary, and review tribal compliance with NAHASDA.

The following chart shows what has been appropriated to tribes for Indian housing under NAHASDA:

Figure 1 – Indian Housing Appropriations



Note: Year 2003 is proposed amount.

In January 2001, the National American Indian Housing Council (NAIHC) developed a research design plan that was submitted to and approved by the U.S. Department of Housing and Urban Development Research Department. This research design plan was formulated to use the case study approach to examine successful projects carried out under the six (6) general eligible housing activities of NAHASDA. The objective of this study is to provide tribes with information on different approaches and successes in the utilization of NAHASDA for each of the eligible activities under NAHASDA. The six (6) general eligible housing activities under NAHASDA are as follows:

- INDIAN HOUSING ASSISTANCE – The provision of modernization or operating assistance for housing previously developed or operated pursuant to a contract between the Secretary and an Indian housing authority.
- DEVELOPMENT – The acquisition, new construction, reconstruction, or moderate or substantial rehabilitation of affordable housing, which may include real property acquisition, site improvement, development of utilities and utility services, conversion, demolition, financing, administration and planning, and other related activities.
- HOUSING SERVICES – The provision of housing-related services for affordable housing, such as housing counseling, in connection with rental or homeownership assistance, establishment and support of resident organizations and resident management corporations, energy auditing, activities related to assisting owners, tenants, contractors, and other entities participating or seeking to participate in other housing activities assisted pursuant to this section.
- HOUSING MANAGEMENT SERVICES – The provision of management services for affordable housing, including preparation of work specifications, loan processing, inspections, tenant selection, management of tenant-based rental assistance, and management of affordable housing projects.
- CRIME PREVENTION AND SAFETY ACTIVITIES – The provision of safety, security, and law enforcement measures and activities appropriate to protect residents of affordable housing from crime.
- MODEL ACTIVITIES – Housing activities under model programs that are designed to carry out the purposes of this Act and are specifically approved by the Secretary as appropriate for such purpose.

Research Methodology

The research project was carried out in four phases, with the fourth phase being the final production of a publication. The following is a breakdown of the four phases.

<p><u>PHASE I-</u> DETERMINE SIX CASES OF STUDY</p>	<p>During this phase each of the ONAP area offices were contacted to request the names of the top six Indian Housing Projects/Programs for their region, one for each of the six NAHASDA activity areas. The Area Offices of Native American Programs (AONAPs) based selection on projects/programs according to the criteria mentioned above. Upon receiving the nominations, NAIHC reviewed IHPs and based selection on projects/programs and activities that:</p> <ul style="list-style-type: none"> • Coincided with tribe’s long-term goals and mission statements • Were (and are) self-governed by the tribe • Have had strong community involvement • Utilized partnerships with entities outside of tribal jurisdictions
<p><u>PHASE II</u> ON-SITE VISITS AND DATA GATHERING</p>	<p>Phase II consisted of travel to selected sites to allow for data gathering, including videotaping.</p>
<p><u>PHASE III and IV</u></p>	<p>Writing of publication and distribution.</p>

Interviews were set up with key personnel as well as community members at each site location for data gathering. The data gathering process included looking at all components of the housing authority while focusing on the selected activity. The outline for data gathering for the research was as follows:

- Tribal Housing Administration: Identify administrative structure of operation and governing authority.
- Identified Needs: Identify current housing conditions, community concerns and how these conditions and concerns were identified.
- Financial Resources: Identify resources utilized in conjunction with NAHASDA funds.

- Project Team Members/ Administration: Identify different project managers, directors and other key personnel required in carrying out project or administering the housing component.
- Lessons Learned: Identify barriers, hindrances and other areas of concerns in carrying out project, as well as lessons learned during project implementation.

During each site visit, videotaping was conducted. Selection of interviewees was done in conjunction with the tribe and varied among housing staff, tribal officials, and community members. The objective was to capture viewpoints of tribal members regarding the ways in which having self-determination in housing through NAHASDA has impacted their community.

A successful housing project activity should be replicable by other areas of Indian country, the region, or local tribal jurisdiction. It should also generate a significant and demonstrable positive impact on those being served or managed. NAIHC selected projects that were part of the tribe's long-term goals, or mission, and demonstrated at least two of the following characteristics:

- Effectively used partnerships among tribal/government agencies, nonprofit organizations, and private businesses
- Included community involvement
- Were governed by the tribe or tribally driven

Special consideration was given to projects or programs that had significant cultural relevance and increased the supply of safe and sanitary housing.

NAHASDA Activity: Model Activity

Housing activities under model programs that are designed to carry out the purposes of NAHASDA and are specifically approved by the Secretary of HUD as appropriate for such purpose.

CASE STUDY – BAY MILLS INDIAN COMMUNITY

Project Activity Description: Construction of a new elder center.

Bay Mills Indian Community is located in Chippewa County, approximately 18 miles west/southwest of Sault Ste. Marie, Michigan (25 miles by vehicle) along the shores of Lake Superior. The tribe owns a total of 3,195 acres of land and has an enrollment of 1372 members, with 915 living within the reservation boundaries. Bay Mills was one of the original four reservations established in Michigan under the Indian Reorganization Act (IRA) of 1934.

Over the last decade, the Bay Mills Community has grown tremendously in the direction of self-determination. A tribal casino as well as other economic ventures provided a means for the tribe to progress forward in all aspects of community, social and economic development. Approximately thirty-three percent (33%) of the tribal members are employed within the tribal government and gaming operations.

TRIBAL HOUSING ADMINISTRATION

The Housing Department of the Bay Mills Indian Community is also known as the Bay Mills Housing Authority, which falls under the infrastructure of the tribal government. The Housing Department is overseen by the Tribal Council, which serves as the Board of Commissioners for the Housing Department. The administration of the Housing Department consists of a Housing Director responsible for a staff of ten employees who carry out day-to-day operations.

IDENTIFIED NEED

In conceptualizing a fundable project, a community survey was conducted, which showed a concern and need for an elder center. Some of the risk factors that were identified were:

- Loss of culture and language: the traditional cultures and language of Native Americans are an integral part of their identities and form the basic foundation for survival of Indian communities.

- Community deterioration: Native American communities are empowered by activities that are relevant to their people and that coincide with their accustomed way of life based on their belief and value systems.
- Lack of group sharing: Group sharing of knowledge and responsibilities is a vital part of the Native American lifestyle. Kindness and care for elders and those who are less fortunate is a valued trait in all Native American communities.
- Elder Abuse: Younger Native American generations are empowered through the teachings and understandings of their elders. Understanding the respect and significant role that elders have within an Indian community is a critical factor.
- Loss of identification: When tribal members spend time struggling to maintain basic human needs such as food, shelter, and water, then self-identification becomes a critical factor, which retards self-determination for the tribal government.

How did the tribe find a solution?

This issue was brought to the Tribal Council for discussion. The Tribal Council supported and passed a resolution for construction of an elder center. Through NAHASDA, under the fundable activity of *Model Activities*, the Bay Mills Indian Community was able to leverage from other resources to have sufficient funding for construction.

How did Bay Mills finance the project?

FINANCIAL RESOURCES

The tribe leveraged NAHASDA funds, tribal funds and an Indian Community Development Block Grant (ICDBG).

The Indian Community Development Block Grant is available through the U.S Department of Housing and Urban Development (HUD). Tribes may use block grants to improve current housing stock, provide community facilities, make infrastructure improvements, and increase job opportunities by supporting economic development. Some of the activities that are fundable are as follows:

- Housing rehabilitation
- Acquisition of land
- Assistance for homeownership
- Construction of tribal facilities for single or multi-use

- Roads
- Economic development projects

The total cost of the project was \$721,303. The breakdown of resources utilized were:

- Total NAHASDA funds in the amount of \$136,682
- \$400,000 from Indian Community Development Block Grant
- \$184,621 from Tribal revenues

Upon securing resources, duration of the project was nine months.

What was the process of putting the project together?

In planning the design, the Tribal Council allowed elders to have input in the construction and design of the facility. A consensus was that the facility should have the following characteristics:

- Support and recognize the importance of the roles that elders play within a Native American community
- Acknowledge the contributions and sacrifices as well as the needs of elders within a community
- Create activities that promote the traditional values and history of elders, as this is the history for the upcoming generations
- Include a history department to allow for interviewing and taping of elders for historical purposes.

Step 1: The tribe identified community needs by involving the community, utilized tools that have in the past been effective for community involvement, and obtained information from the tribal planning and economic offices as to activities that worked best for community involvement.

Step2: Upon identifying the need, the tribe ensured that all decision-making representatives were involved throughout the process. This included the Tribal Council, committee boards, community members, and elders.

Step 3: The tribe identified their resources.

HUD Information:

- A recipient for housing for non low-income Indian families and model activities obtains HUD approval by submitting a proposal within the Indian Housing Plan (IHP) to operate model housing activities as defined in section 202(6) of the NAHASDA regulation.
- HUD will determine whether to approve model housing activities by reviewing the proposal with the goal of approving activities that allow flexibility, discretion, and support for the self-determination objectives of NAHASDA.
- Upon receiving the model housing activity proposal, HUD has 60 calendar days to grant approval or disapproval. If no response is received within 60 days, the proposal is deemed to have approval.
- The tribe has 30 calendar days to respond to a denial of a model activity; HUD will then respond to the tribe within twenty days via the Assistant Secretary.

PROJECT TEAM

The project team established to carry out the project was as follows:

Project Team	Role
Tribal Council	<ul style="list-style-type: none">• Responsible for providing resolution• Serves as Board of Commissioners for housing
Housing Authority	<ul style="list-style-type: none">• Conducted community survey• Provided results to Tribal Council• Ensured HUD IHP compliance for model activity• Received input from elders for design• Designed layout for elder center
Contracted consultants	<ul style="list-style-type: none">• Developed master plan for construction• Provided financial expertise
Architecture firm	<ul style="list-style-type: none">• Provided engineering plans and site plan

LESSONS LEARNED

- Develop a good working relationship within the community. *When working on a project which will affect the entire community, it is important to maintain open communication and a positive working relationship with all those involved. Bay Mills found that poor communication could bring an immediate halt to production if one facet of the community thought it would be negatively impacted.*
- Have trained qualified staff to begin a large construction project. *If you do not have a qualified person on staff, use consultants. This will ensure appropriate in-depth knowledge.*
- Form an original plan and stick to it. *A project can get way over budget if it has extensive changes. Delay the project if necessary until you know exactly what you want to do.*

Conclusion

Native Americans have a status with the United States that recognizes Native distinct cultural and political rights, including the right to operate as a separate government within tribal boundaries, in a way that is culturally relevant to the needs of their people. A tribal government's self-determination is essential for empowerment of a strong healthy community. Through NAHASDA, the Bay Mills Indian Community had the decision and control regarding what type of model activity would be most beneficial for their people, based on their own values and skills. This project will preserve wisdom from the elders within the community as well as become a vital part of the community, as it will restore some of the respect that was taken away from elders in the past. In addition, it will reinforce among the younger generations the important role that elders have within a tribal community as well as acknowledging that role.

Since the opening of the Bay Mills Elder Center, a senior council has been established; several meetings have taken place as well as a hosting of a national elder convention. A development of an elder center has been a great step for the people.

Contact Information:

Executive Director
Bay Mills Housing Authority
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Brimley, MI 49715
Phone: 906-248-5524
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NAHASDA Activity: Development

The acquisition, new construction, reconstruction, or moderate or substantial rehabilitation of affordable housing, which may include real property acquisition, site improvement, development of utilities and utility services, conversion, demolition, financing, administration and planning, and other related activities.

CASE STUDY – CATAWBA TRIBE

Project Activity Description: Green Earth – development of 120 units.

The Catawba Tribe is located in South Carolina, near the North Carolina border. The original reservation was approximately 15,000 square miles. The reservation today is located near Rock Hill, South Carolina. Between 1942 and 1962, the tribe had Federal Recognition Status and was located within the boundaries of the original reservation, consisting of 640 acres. Federal Recognition was terminated in 1962. In 1993, the Catawba Tribe regained federal recognition after a long court battle. Today, the Catawba Tribe has 2,580 members.

TRIBAL HOUSING ADMINISTRATION

The housing component of the Catawba Tribe is known as the ISWA (River) Development Corporation. The ISWA Corporation is responsible for carrying out the activities specified in the Indian housing plan. A board of seven directors, comprised of tribal representatives and local business leaders, oversees the corporation.

IDENTIFIED NEED

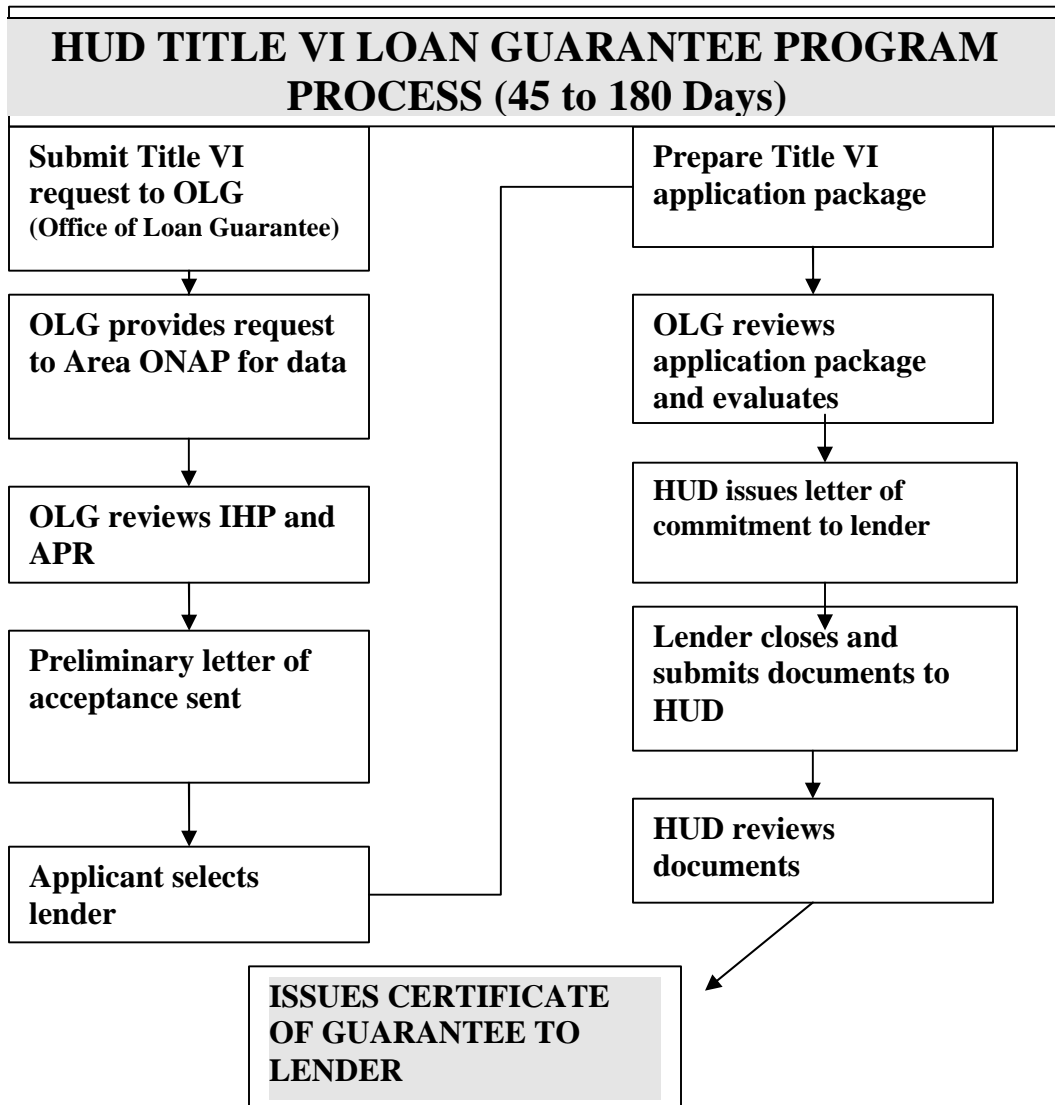
In 1997, the Catawba Tribe conducted a census and analysis to determine the actual number of tribal members, along with their housing and economic conditions. It was considered imperative that the ISWA Corporation perform the analysis as the corporation could better identify housing issues and concerns than other parties. As is the case in many Native American communities, the results revealed housing conditions that demanded attention. Of the households that were identified in the analysis, numerous families were living in overcrowded living conditions, many homes needed repair, and other homes were deemed to be substandard.

The analysis also revealed that the existing number of houses, in relation to the tribal population, showed a critical housing shortage. It was determined that an additional 200 rental units for low-income families and 120 homeownership units for the same income group were needed.

With current NAHASDA funding allocations, the tribe could only afford to build 12 houses a year. Based on this, the tribal challenge was to find a way to build more homes in less time to accommodate the needs of their people.

How did the tribe find a solution?

Through the NAHASDA Title VI Loan Guarantee program, the tribe found a solution. The tribe was able to develop a 120-unit housing development project known as “Green Earth.” This project was financed through First Union Bank in conjunction with the Title VI loan guarantee program. The purpose of Title VI Loan Program is to guarantee loans with private lenders to promote financing for tribal governments. The application process is as follows:



The proposed homes were as follows:

- 65 single-family homeownership units ranging from three to five bedrooms in size
- 25 two-bedroom homeownership cottage units for elders and singles
- 30 multi-family rental units

The homes were designed to be energy efficient and also pre-wired for computer network capability.

How did ISWA Development Corporation finance the project?

The total cost of Green Earth was estimated at \$10.8 million dollars, with \$5,300,000 provided by First Union Bank under the Title VI loan guarantee program. The project is to be carried out over a three-year period.

FINANCIAL RESOURCES

The development of Green Earth started in 1998. Funding for the project was leveraged from the following financial resources and participating entities:

- HUD Indian Housing 1937 Act funds
- NAHASDA funds (FY 1998 through 2003)
- HUD Rural Housing and Economic Development funds
- Indian Health Services (sewer and water)
- Community Development Block Grant
- South Carolina Housing Trust
- First Union Bank under the Title VI Loan Guarantee Program

PROJECT TEAM

The team established to carry out the project was as follows:

Project Team	Role
Tribal Council	<ul style="list-style-type: none"> • Responsible for acquiring land and placing it into trust status • Provided resolution for TDHE to operate independently
Environmental Compliance Natural Resource Board	<ul style="list-style-type: none"> • Provided input on conservation and natural resources
Cultural Preservation Project Board	<ul style="list-style-type: none"> • Provided input on cultural preservation

ISWA Development Corporation (TDHE)	<ul style="list-style-type: none"> • Responsible for carrying out housing plan • Contractor and developer
Duncan Long and Associates	<ul style="list-style-type: none"> • Conducted market analysis
Kapp Investments	<ul style="list-style-type: none"> • Provided financial expertise
Pimsler-Hoss Architects	<ul style="list-style-type: none"> • Designed layouts for houses
Village Habitat, Inc.	<ul style="list-style-type: none"> • Developed master plan for construction
Campco Engineering	<ul style="list-style-type: none"> • Developed engineering plans for roads, water and sewage

What was the process of putting the project together?

The process that ISWA Corporation developed in carrying out the project is as follows:

Conducting Market Analysis:

- Determine number of families needing assistance
- Determine family size and income
- Estimate available income for housing payments
- Determine number of qualified homebuyer candidates versus number of units needed, taking number of bedrooms into account
- Prepare waiting list

Identifying the Project:

- Determine number and type of units proposed
- Select location (trust land versus fee simple land/cluster versus scattered sites)
- Prepare preliminary cost estimates

Approval from HUD:

- Submit project description
- Acquire approval letter

Organize Development Team:

- Project management
- Financial expertise
- Grant research and preparation
- Land planning and engineering
- Environmental evaluation
- Cultural preservation
- Architectural design
- Construction management

Conduct Environmental Review:

- Environmental assessment was done in accordance with Code of Federal Regulations (CFR) 24 CFR part 58.

Potential Partners:

- Research and identify additional funding resources.

Development of Project Plan and Loan Prospectus:

- Prepare infrastructure (water, sewage, and roads) plan showing layout and costs.
- Complete detailed analysis of cost versus projected revenues for the project.
- Prepare housing plan and estimate associated costs, showing types of houses and square footage.
- Develop procedures for establishing rent and homebuyer payments and collection process.
- Prepare loan prospectus and include the following:
 - Project overview
 - Development team
 - Development costs
 - Other funding sources being used for project
 - Pro-forma (construction schedule, draw downs, revenues, expenditures, loan terms)

Solicit Bank Proposals:

- Send plan to local banks
- Acquire term sheets from at least two banks

Selection of Bank:

- Review bank proposals and select bank based on best terms possible (interest rate, years, closing costs, points, etc.)
- Assist bank in submitting Title VI application to HUD

Loan Closing:

- Title VI application approval from HUD
- Closing items (plans, legal documents, environmental studies, appraisals, loan note, and other related items)

Barriers:

- Loan process took a year before closing due to lender's lack of familiarity with Title VI regulations.

LESSONS LEARNED

- Develop infrastructure and property (water, land, sewage, roads) prior to building. *ISW Corporation developed the infrastructure and property simultaneously, which made logistics difficult.*
- Make sure housing department is adequately staffed and trained to carry out a sophisticated project. *ISWA Corporation was understaffed while it carried out the project due to lack of funds for hiring of new staff. This caused some staff to assume multiple responsibilities for the project, creating additional stress.*
- Competition is cost effective. *In pursuing a lender, the corporation had three banks competing with each other; this helped the corporation secure low interest rates and better terms than if the banks had not been competing.*
- Know what your housing needs are and how your housing project meets those needs. *ISWA Corporation outsourced to consultants, but they also knew their project and how the project met the needs of their people. As a result, consultants were not able to create additional work for themselves. This minimized consultant costs.*
- Optimize the resources that are available. *While waiting for financing approval, the tribe had resources available from NAHASDA to build 20 homes and proceeded to build infrastructure for those homes.*
- Environmental review should be completed before funds are used for project development. *This will avoid any potential environmental problems that may impact the project. Note: The environmental review is a requirement; failing to complete a review could cause tribe/TDHE to lose funds if not conducted prior to building.*
- Identify other potential resources. *ISWA Corporation found that additional grants reduced amount of project financing needed under the Title VI loan guarantee.*

Conclusion

Although the Catawba Tribe was successful in establishing financing for a housing development project, the primary barrier for the Catawba Tribe in meeting their housing needs was funding. Current funding received from NAHASDA in the form of the block grant was insufficient and would only allow the construction of 12 units a year, which would only meet approximately 3% of their housing needs. Through a committed project team and NAHASDA's flexibility, the tribe was able to leverage from other funding sources as well as utilize Title VI, which allowed for more development in a

shorter time frame. The tribe had regulations to comply with for each of the resources used. This made for a more complicated project as well as a later project commencement

date. ISWA Corporation became the contractor as well as the developer in carrying out the project. This avoided additional costs for overhead and profit to outside contractors. As of August 2002, about 42 homes have been completed. Twenty-one homes are currently occupied and the other 21 homes are scheduled for occupation by September 2002. Green Earth is a three-year development project and is targeted for completion in August of 2003.

Contact Information:

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NAHASDA Activity: Housing Services

The provision of housing-related services for affordable housing, such as housing counseling, in connection with rental or homeownership assistance, establishment and support of resident organizations and resident management corporations, energy auditing, activities related to the provision of self-sufficiency, and other services related to assisting owners, tenants, contractors, and other entities participating or seeking to participate in other housing activities assisted pursuant to this section.

CASE STUDY – White Mountain Apache Tribe

Project Activity Description: Apache Dawn – development of 250 units to assist with and promote homeownership.

The White Mountain Apache Tribe is located on the Fort Apache Reservation in east central Arizona near White River. The current tribal enrollment is approximately 12,257.

TRIBAL HOUSING ADMINISTRATION

The housing component of the White Mountain Apache Tribe is known as the White Mountain Apache Housing Authority. A board of commissioners oversees the housing authority and consists of four members who are representatives from the White Mountain Apache community. The board has the authority to make recommendations on housing issues and to assist with policy development and adherence. The administration of the housing department consists of an executive director responsible for a staff of one hundred and two that carry out day-to-day operations within the housing department. The housing mission of the White Mountain Apache Tribe is to:

- Promote and develop affordable quality housing opportunities
- Establish homeownership opportunities
- Have housing operations that are efficient and effective
- Strengthen relations with housing tenants
- Promote partnerships with outside entities

IDENTIFIED NEED

The housing situation for the White Mountain Apache people has been extremely difficult for decades. Housing shortages, lack of economic development, high unemployment, and population growth are critical factors. Past and current funding opportunities under NAHASDA have not been sufficient to address the housing needs of the tribe. The current waiting list has 1400 families in need of housing. The tribe determined that the only solution to this was the development of more homes.

How did the tribe find a solution?

Through the provisions of NAHASDA, the tribe was able to leverage funds from other programs. This allowed the tribe's solution to become reality through what is now known as "Apache Dawn," a 250-unit single-family housing development. The project was developed over time and in five phases. The project commencement date was in March of 1999; it took nine months to structure, issue, and sell bonds. Construction of the homes started in December of 1999 for a four-year project to be developed in five phases as follows:

- Phase I: 52 homes
- Phase II: 31 homes
- Phase III: 45 homes
- Phase IV: 100 homes
- Phase V: 22 homes

Target date for completion of Phase V is August of 2003.

How did White Mountain Apache Tribe finance the project?

FINANCIAL RESOURCES

The main funding resources utilized were as follows:

- Tribally issued tax-exempt bonds: Tribal governments qualify for reduced tax-exempt rates of interest. Receipt of the interest payments made on the debt is excludable from the gross income of the lender for federal tax purposes.
- HUD Section 184 Guaranteed Loan Program: Program designed to guarantee loans for private lenders who work with Native American and Alaskan communities.
- Indian Community Development Block Grant: The ICDBG Program provides eligible grantees with funds for use in developing viable projects within Indian and Alaska Native Communities. This includes decent housing, a suitable living environment, and economic opportunities, primarily for low and moderate-income persons.
- NAHASDA: A congressional act that provides a formula grant to Native American tribes and Alaska Natives for affordable housing activities. NAHASDA is the acronym used for the Native American Housing Assistance and Self-Determination Act.

What was the process of putting the project together?

The planning and application process for Apache Dawn took nine months, as compliance for each of the resources being used had to be ensured.

Below is a timetable and tasks carried out by the tribe:

Duration	Task	Additional Info
1 week	Organizational Meeting Selection of Team Players	<ul style="list-style-type: none"> • Alleviated hindrances • Identified expertise that is needed • Identified key players
2 week	Development of Program Guidelines	<ul style="list-style-type: none"> • Set foundation for program • Began the planning process • Developed plan to take before tribal council
3 week	Preliminary Approvals of Tribal Council/TDHE	<ul style="list-style-type: none"> • Authorization to proceed forward
3 week	Initial Draft of Documents	<ul style="list-style-type: none"> • Tribal Lease • Occupancy Agreement • Maintenance Stipend Mortgage • Promissory Note Policies • Individual Loan Leasehold • Construction Loan Agreement • Construction Contract • Performance and Payment Bond
4 week	Meeting with HUD	<ul style="list-style-type: none"> • To coordinate environmental reviews • To establish rapport • IHP compliance • Other compliances
5 week	Development of Plans, Specs, Functions, Surveys	<ul style="list-style-type: none"> • Housing Designs • Legal surveys • Land surveys • Topography surveys
6 week	Development of Construction Bid Documents	
7 week	Drafting Session	<ul style="list-style-type: none"> • Review of all documents that have been initiated to date
8 week	Drafting Session	<ul style="list-style-type: none"> • Review of documents
9 week	Lender underwrites Section 184 Loans	
10 week	Review of Second Draft of Documents	<ul style="list-style-type: none"> • Necessary modifications

11 week	Apply for Bond Ratings	<ul style="list-style-type: none"> This is necessary for investors' purposes
12 week	Appraising of Homes to be Constructed	Appraised by qualified appraiser based on plans and specifications
13 week	Environmental Compliance	Archaeological Preservation Environmental Assessments Land Preservation
14 week	Tribal Council/TDHE Approvals	Any documents that require approval from tribe and HUD
15 week	Firm Commitment from HUD	Letter of commitment from HUD
16 week	Final Draft of Bond Documents	Bond offering statement
17 week	Documents Made Available to Investors	
18 week	Price Bonds	Performed by bond company
19 week	Complete Documents	
20 week	Close Bonds	
21 week	Close and Record Section 184 Loans	
22 week	Receive HUD Endorsement	Final guarantee of 184 loan

PROJECT TEAM

The planning took nine months and was managed by a project team. The key players on that team were as follows:

Project Team Member	Responsibilities
<u>Tribe</u> White Mountain Apache Tribe	<ul style="list-style-type: none"> Commitment to proceed with program and bonds Approved the bond issue
<u>TDHE</u> Victor Velasquez, Executive Director Mariddie Craig, Chairperson Andrew Kinney, Jr., Board Member	<ul style="list-style-type: none"> Issuer of bonds Property owner Sole borrower/mortgagor Developer Program administrator
<u>Legal</u> Offices of John W. Weiderman	<ul style="list-style-type: none"> Counsel to the TDHE Co-coordination on project Drafted documents
<u>Consultant</u> A.J. Consultant Services Aneva Yazzie	<ul style="list-style-type: none"> Management consultant Co-coordinator on project Developed IHP Pre-Occupancy consultant Recorded leases/titles Consultation on offering documents
<u>Servicer</u>	<ul style="list-style-type: none"> Servicer for individual loans

Countrywide Homes Loans Inc. Mike Awadis, Vice President	<ul style="list-style-type: none"> • Purchased loans from lender • Pooled loans into GNMA security • Program administrator
<u>Bond Underwriter</u> U.S. Bancorp Piper Jaffray	<ul style="list-style-type: none"> • Structured the bonds • Underwriter/sold the bonds • Managed financing timetable • Obtained bond rating • Ran cash flows • Invested bond proceeds
<u>Underwriter Counsel</u> Lenard Street & Deinerd Richard Martin, Attorney Barb Skaar, Legal Assistant	<ul style="list-style-type: none"> • Securities registration exemption • Drafted offering statement • Drafted bond purchase agreement • Due diligence
<u>Trustee</u> National Bank of Arizona Audrey Adamic, Vice President	<ul style="list-style-type: none"> • Trustee and paying agent • Administers bond accounts • Insures compliance under bond documents
<i>Other: Investors, Investment Agreement Providers, Project Architect, Contractor and various council members</i>	

LESSONS LEARNED

- Conduct an in-depth analysis of affordability. *The tribe started building homes with general assumptions of affordability, which caused cost cutbacks in designing of the homes.*
- Identify income profiles. *This will identify target areas.*
- Conduct environmental reviews as early as possible. *The tribe conducted financing and environmental reviews at same time, not realizing the long process for an environmental review.*

Conclusion

One of the most notable attributes of this housing project, outside of bringing the resources together, was a Housing Executive Director’s vision for the White Mountain Apache people. This vision, in conjunction with the tribal housing mission and housing needs of the people, was the key ingredient in conceptualizing a project such as “Apache Dawn.”

Creating a means to finance the Apache Dawn Project was not an easy task to carry out. Strong commitment was required from each of the project team members. This commitment was crucial since the project team was the driving force in achieving

the objective. Likewise, the strong support of the tribal governing body was essential to ensure success.

In carrying out the project, the tribe was granted a waiver from HUD. NAHASDA regulations require that an environmental review be completed before HUD's execution of the Indian Housing Block Grant Agreement under which a project will be assisted. To support project progression, and in accordance with 24 CFR 1008, HUD granted a waiver to NAHASDA regulation 24 CFR 1000.20(a).

In addition, the Office of Native American Programs granted a waiver. Under the 184 program there is a 20-unit restriction guideline on loans and a 10% contingency fee. The tribe was granted a waiver to the 20-unit restriction, and the contingency fee was reduced from 10% to 5%.

"Apache Dawn" also demonstrated that when a tribe is given more control over its own housing program, the tribe can reach a success rate higher than that realized in the last few decades. The total cost of "Apache Dawn" was \$25 million.

Although the White Mountain Apache Tribe was successful in the development of 250 homes, they are still faced with an unmet need. Lack of funding is the biggest challenge facing the housing authority. Identifying more resources to address infrastructure and the critical housing shortage remains a top priority for the White Mountain Apache Tribe. Many families are still without homes; construction of 250 homes will only address 16% of the need on their waiting list.

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NAHASDA Activity: Indian Housing Assistance

The provision of modernization or operating assistance for housing previously developed or operated pursuant to a contract between the Secretary and an Indian housing authority.

CASE STUDY – Metlakatla Indian Community

Project Activity Description: A program activity to assist students in meeting their housing needs while attending college.

The Metlakatla Indian Community is located on Annette Island, 15 miles south of Ketchikan, Alaska, which is accessible by air and water only. The tribal population is 1,564.

TRIBAL HOUSING ADMINISTRATION

The Metlakatla Housing Authority serves the Metlakatla Indian Community. The housing authority is responsible for carrying out the activities specified in the Indian Housing Plan under the direction of a housing authority executive director. A board of five commissioners elected from within the tribal community oversees the housing authority.

The housing mission of the community is to continuously establish principles to assist the members of their community in meeting their needs for housing. These principles include the following:

- Involving tribal community support
- Developing goals and strategies that are unique to the community's needs
- Enforcing cultural and family values
- Developing partnerships with outside entities

IDENTIFIED NEED

The education system provided on the island for tribal members does not go beyond the high school level. To obtain further education, tribal members have to leave the island, which, in many cases, creates a financial hardship. This has made it difficult for many to further their education and results in students returning to the island prematurely. This has made education a low priority. Some of the problems the tribe has experienced include the following:

- High unemployment rate
- High alcohol and drug abuse rate
- Low priority for education
- High general assistance rate.

An elder within the community talked with other community members and determined that housing was one of the major factors in why their young adults were returning.

Comment from elder in community:

“My concern was the students! I noticed that some our students were coming home, not finishing their year of going out to college; they couldn’t finish cause of lack of funding!”

Comment from a student:

“It’s the easiest part to get out and to go to school, but it’s hard to find housing and to keep up with monthly payments!”

How did the tribe find a solution?

This issue was brought to the attention of the Housing Executive Director who then brought the issue to the Housing Board of Commissioners to see if anything could be done to assist the younger generation while they were attending school.

Through NAHASDA, under the fundable activity of *Housing Assistance*, the Metlakatla Community found a solution. A tribal resolution was passed and the housing director was given the task of setting up the assistance program.

How did the housing authority finance the project?

In funding the project, the tribe utilized \$45,000 from NAHASDA and designed the program to work in conjunction with the education department. Each student receives a stipend of \$250.00 monthly, along with education resources, in order to alleviate some of the living expenses that students incur. The assistance has proven to be successful in that students are completing their yearly curriculums. Information has also shown that more community members are leaving to attend school.

What was the process of putting the project together?

In establishing the program, the following steps were conducted:

Conduct Assessment

- Determine number of students to serve
- Determine other resources that are available

	<ul style="list-style-type: none"> • Determine amount of funding needed
<u>Establish Eligibility Criteria</u>	<ul style="list-style-type: none"> • Number of credit hours to qualify • Tribal membership factors • Qualifying schools • Income levels • Deadlines • Required documents
<u>Develop Application Forms</u>	<ul style="list-style-type: none"> • Include departments that provide information
<u>Orientation</u>	<ul style="list-style-type: none"> • Provide guidelines for students • Responsibilities • Rules • Disqualifying factors
<u>Establish Means of Informing Potential Students</u>	<ul style="list-style-type: none"> • Conduct workshop at high school • Newspapers • Provide information to education department
<u>Evaluate and Review</u>	<ul style="list-style-type: none"> • Get input from students • Program administrators • Landlords

PROJECT TEAM

The tribe utilized most positions within the housing authority to administer the program. The housing manager was responsible for eligibility and application tracking. The accounting office tracked the budget. The project assisted 35 students.

LESSONS LEARNED

In carrying out the project the housing authority had no unusual barriers, but noted the following lessons learned:

- Make sure students are orientated in notification procedures, should withdrawal take place. *The Housing Authority sent checks out prior to receiving information from the school. This caused a considerable amount of time in retrieving checks and tied up funds.*
- Make sure information and applications are taken in a timely manner for planning purposes. *This will assist students in financial planning.*
- Have a financial tracking system in place that tracks each student. *This will enforce accountability of funds for each student.*

Conclusion

The Metlakatla Indian Community is unique in that they have their own island. However, in owning an island, several other factors are critical. Although some of these factors are similar to those found in other tribal communities, being on an island presents more unique difficulties. Some of these factors are as follows:

- Transportation: The island is only accessible by air and water, which causes high transportation costs for community members
- High rate of unemployment: The tribe has an unemployment rate of 80%
- No economic development
- Limited school facilities
- Isolation

The housing assistance program that has been established for the Metlakatla Community through NAHASDA will continue to empower their community. Having a program in place such as this promotes education. Tribal members in return will become self-sufficient as well as educated, which will then allow for strong role models and future leaders for their people.

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NAHASDA Activity: Housing Management

The provision of management services for affordable housing, including preparation of work specifications, loan processing, inspections, tenant selection, management of tenant-based rental assistance, and management of affordable housing projects.

CASE STUDY – Salish & Kootenai Housing Authority

Project Activity Description: Successful housing management.

The Flathead Indian Reservation (1,244,000 acres) is where the Confederated Salish and Kootenai Tribes reside. The Tribes consist of a confederation of Salish and Pend d'Oriettes Tribes and the Kootenai, as an individual tribe. The tribal enrollment is approximately 6,800. Approximately 3,700 tribal members live on or near the slope of the Rocky Mountains. The tribal headquarters are in Pablo, Montana.

TRIBAL HOUSING ADMINISTRATION

A six-member board of commissioners that are appointed by the tribal council governs the Salish Kootenai Housing Authority (SKHA). They are subject to tribal law as well as federal housing statutes and regulations. This ordinance allows the Housing Authority to operate independently from the tribal government. The board members have over twenty years of experience in housing and all senior housing authority staff members are certified housing managers with an average tenure of 15 years. Under the direction of the executive director, the Salish Kootenai Housing Authority is broken down into six operational departments with a staff of 80.

IDENTIFIED NEED

The SKHA conducted a comprehensive survey of its members both on and off the reservation. The survey had a 70% return rate and showed that emphasis needed to be placed on programs that ultimately lead to homeownership. This became the primary document for planning. In determining the housing need, the tribe also utilized data from the following sources:

- Bureau of Indian Affairs (BIA) census figures
- Housing Improvement Program (HIP) figures
- Substandard housing information
- Waiting list
- Tribal Council
- Board of Commissioners
- Staff within Housing Department

How did the tribe find a solution?

Based on the community survey, the tribe identified and determined that to better serve the needs of their people, a system would have to be developed that would move tribal members in the direction of homeownership and that would have the capacity of dealing with financial complexities.

Through NAHASDA, under the eligible activity of *housing management*, the tribe became aware of an opportunity to restructure their housing management system. The tribe looked at their existing organizational structure to see what areas could be expanded to best accomplish their goal of developing effective programs that would ultimately move in the direction of homeownership opportunities for their people.

The tribe came up with a new program known as the Flathead Finance Program (FFP). The FFP consists of a program to assist potential homeowners with home buyer counseling classes; in addition, the tribe offers a couple of options under the FFP such as down payment assistance and a first mortgage finance program. The Tribe identified their resources and found that through their own proceeds of sale funds, they were able to secure a source to assist in development of their finance program.

Under NAHASDA and a new tribal ordinance that gave them greater flexibility, the SKHA was able to restructure and use other resources, such as the Low Income Housing Tax Credit Program. The tribe has completed a tax credit funded rent-to-own project consisting of 20 units.

The tribe centralized six operational departments into one building. NAHASDA funds are allocated to each department based on their needs. Each department manager is responsible for running his or her department and for ensuring that funds are exhausted as planned. In addition, the management team works together to evaluate all resources that are available. Once a resource is identified, then the manager in that area takes the lead in pursuing and securing the resource. Resources are identified by the needs of the people.

Under NAHASDA, the tribal council delegates authority for running their housing programs to the Housing Authority. Without increased liability to the tribe and tribal sovereignty, their housing ordinance was rewritten to comply with NAHASDA. Authority over housing decisions was split between the Housing Authority and the Tribal Council.

Annual joint meetings are held between tribal council and housing staff. Quarterly reports are provided to summarize all activities and self-monitoring activities as well as to allow feedback from the tribal council on current policies that may need modifications.

In keeping with its numerous funding sources, the Housing Authority has strict monitoring controls in place to ensure compliance and prevent mismanagement. Quality

assurance is done on a daily basis for all activities under the management of the Housing Authority, such as maintenance, trouble calls, construction and administration.

How does the Salish Kootenai Housing Authority finance the programs?

FINANCIAL RESOURCES

The tribe continuously utilizes the following funds, in conjunction with their NAHASDA IHBG funds, to carry out their housing authority operations:

Low Income Housing Tax Credits: The tribe is in their fourth tax credit-funded project. The first project developed 20 units of rent-to-own housing. The second and third projects were 10 units; each project included rental units for elderly and disabled tribal members. The last project developed under this program is a rehabilitation project. The tribe is currently rehabilitating 33 units that the housing authority owns.

Indian Community Development Block Grant (ICDBG): The tribe has been utilizing the ICDBG funds for years for various needs; one need that has been met is the rehabilitation of private owned homes. They are currently utilizing their ICDBG for water and sewer infrastructure.

USDA Rural Development: The tribe has been very successful in partnering with USDA Rural Development for water and sewer grants and loans. They just recently received approval for a development from the 515 program. They will be building 12 two-bedroom units for rentals with the 515 funds. The tribe also received a Housing Preservation Grant from RD this year. The HPG will be used for rehabilitation of privately owned homes.

Title VI Loan Guarantee: The tribe purchased a mobile home park under the Title VI guaranteed loan program. They are currently awaiting word on two additional Title VI loan guarantees they have applied for.

What was the process of putting the programs together?

Step 1: The Housing Authority conducted a comprehensive survey of its members, both on and off the reservation.

Step 2: The tribe reviewed existing infrastructure and identified those areas that would need to expand in order to accomplish their goal of homeownership. The housing ordinance was rewritten to comply with NAHASDA.

Step 3: The tribe reviewed all policies and procedures and modified them in order to coincide with NAHASDA regulations.

Step 4: The tribe reviewed current resources and identified additional resources that would be needed.

PROJECT TEAM

The tribe centralized six of their existing operational departments into one building. This streamlined communication and strengthened the tribe’s team concept, which in return resulted in more efficient services to the member of their community

The six departments are as follows:

- Finance Department: responsible for all budgetary planning and accounting.
- Administration Department: responsible for all administrative activities, contracting, procurement, and inventory.
- Housing Resource Department: responsible for planning, assessing needs, acquiring land, and constructing new units.
- Occupancy Department: responsible for all phases of occupancy and application processing.
- Maintenance Department: responsible for planning routine and preventive maintenance and administering a long-term maintenance program.
- Operations Department: responsible for the operation and maintenance of community systems (water and sewage) and insuring compliance with federal and tribal regulations.

In addition to the operational departments, the following programs are in place to meet housing needs:

Program Name	Description
Weatherization	Provides analysis and installation of heating systems, insulation, air infiltration, ventilation, moisture control, water heaters, and other measures to meet energy conservation.
Tribal Operations	Complies with the Safe Drinking Water Act as mandated by the Environmental Protection Agency. Conducts all necessary testing for bacteria, chemicals and synthetic organic chemicals. Operates and maintains community water and sewer systems.
Maintenance	Repairs units, maintains grounds, provides snow removal, and handles pet and animal control issues.

Engineering/Construction	Completes installation of septic tanks, drain fields, pumps, wells, water mains and service lines.
Down Payment Assistance	Assists first time homebuyers with securing a down payment.
First Mortgage Finance	Assists families in obtaining homeownership through a lease option.
Rehabilitation Loans	Available to families who cannot obtain conventional financing due to credit, debt ratio, etc.
Low Income Housing Tax Credits	Provides homeownership and rental opportunities through a lease-to-own program.
Home Improvement Program (HIP)	Assists members with alleviating substandard conditions through emergency repair and rehabilitation.

LESSONS LEARNED

- In developing programs, make sure community members are prepared to transition into a program. *Since the inception of the Flathead Finance Program, the tribe has incorporated changes such as discontinuing the first mortgage financing component. The Tribe found that a better solution was to ready the families for a mortgage by focusing on counseling and orientation to the concept of homeownership.*
- Utilize banks and other lending institutions. *With limited resources, it is much better to utilize those institutions that have mortgage processing in place.*
- Create programs and do not get politically involved. *The tribal government charges SKHA with the responsibility of providing housing for its members. The tribal government does not get involved in the day-to-day operation of the SKHA; they allow them to develop the necessary programs and to use all resources effectively and efficiently to accomplish the goal of providing affordable housing.*

Conclusion

The Salish Kootenai Housing Authority has developed a management system that is very effective in carrying out the mission of the Housing Authority. The Housing Authority views good management to be extremely important because it provides consistency to the people they serve. The tribe has a strong management team and executive director who can discuss issues openly and honestly, which helps to further the effectiveness of their organization. Working together as a team allows the housing authority to evaluate situations from many perspectives in identifying the best way to proceed.

The Housing Authority's Executive Director consistently sets forth a vision for the mission and in return the tribal council ensures that the Housing Authority has the following capacities:

- Good audits
- Financial capacity
- Management capacity

The tenure of the board members and senior staff provides the tribe with stability, which is very important for continuity.

Management systems are continuously reviewed and updated to (where necessary) ensure that effective and timely services are being provided to tribal members. The Salish Kootenai Housing Authority views strong leadership and guidance as a key element within their management structure; these elements provide them with a successful management system.

In providing services to their members, the Salish Kootenai Housing Authority views its rental program as the first step in moving tribal members towards homeownership. The tribe believes changed behavior at this level will encourage tribal members to take on more responsibility as they move towards homeownership.

The Housing Authority's objective is to provide young families every opportunity to own their own homes, as this will assist them in developing independence. The Salish Kootenai tribe is moving in the direction of using housing equities as a way to improve the lives of their people. This opportunity has not been available for many Native Americans that reside within tribal boundaries due to the complexities of

- Federal land trust
- Lack of mortgage financing
- Economic development
- Limited resources

Currently, the Housing Authority manages about 500 rental units and has developed approximately 500 homeownership units for tribal members. Half of these homeownership units are still under management. In addition, the Housing Authority is responsible for the development and management of the community water and sewage systems, as well as other related housing services that the tribe sponsors. Current housing and development is continuously looked at as a resource for the tribe and its members.

Although the Salish Kootenai Housing Authority has a highly effective management system in place, the tribe still faces critical housing shortages and high costs of putting infrastructure, such as water, sewage and roads, in place. The tribe continues to seek other resources to meet the needs of their people, as current funding under NAHASDA is inadequate to meet those needs.

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NAHASDA Activity: Crime and Prevention and Safety Activities

The provision of safety, security, and law enforcement measures and activities appropriate to protect residents of affordable housing from crime.

CASE STUDY – Menominee Tribe

Project Activity Description: Drug Elimination Program.

The Menominee Reservation is located in northeastern Wisconsin, about 45 miles northwest of Green Bay. The reservation spans approximately 235,000 acres, of which 223,500 acres are heavily forested, representing the largest single tract of virgin timberland in Wisconsin. The total tribal enrollment is 7,202, with reservation population being approximately 4,000.

TRIBAL HOUSING ADMINISTRATION

The housing component of the Menominee Tribe is known as the Menominee Tribal Housing Department, which falls under the infrastructure of the tribal government. A committee known as the Legislative Housing Committee oversees the governance of the Housing Department. The Housing Committee consists of six members and has the authority to make recommendations on housing issues, assist with policy development, and monitor adherence to policies. The administration of the Housing Department consists of an Executive Director responsible for a staff of thirty-nine employees that carry out day-to-day operations within the Housing Department.

IDENTIFIED NEEDS

Drugs and crime activities have progressed aggressively for the Menominee Tribe over the last decade and have escalated to a point of becoming extremely visible among all community members. Some of the most prevalent drugs being used in the community are heroine, cocaine, crack, THC, and alcohol. Research for the tribe has shown that the highest drug usage was among the youths of the community, predominantly among those who are eleven years old, with the youngest case being seven years old.

The following are some of the most notable consequences resulting from drug use:

- Domestic violence
- Child abuse and negligence
- Death
- Destruction of community neighborhoods
- Vandalism
- Highly dysfunctional families
- Alcoholism
- Fetal Alcohol Syndrome
- Gang activity

Emotional abandonment of minors has become commonplace. Family chase-offs are a huge issue. This is where parents are drinking or abusing drugs within the home and when the children return home, they are asked to leave, or terrorized to the point of having to leave the home. This results in children returning to the streets and slowly mingling with gang members and moving into the usage of drugs.

How did the tribe find a solution?

In 1997, the Menominee Tribe began to take active steps in developing a more effective comprehensive drug prevention program. The tribe had anticipated receiving funds from the Drug Elimination Program; however, current wording of the Indian Drug Elimination grant prevented eligibility for tribal housing. Through NAHASDA, under crime and prevention activities, leveraged with other resources, the Menominee Tribal Housing Department was able to carry out the drug elimination program as an immediate solution to the increasing crime rate.

How did the Menominee Tribe finance the program?

FINANCIAL RESOURCES

In 1998, the tribe was able to leverage additional funding from a Drug Free Communities Support grant, which was made available from the Office of Juvenile Justice and Delinquency Prevention Program. In addition, program changes in the Indian Drug Elimination Program allowed the tribe to become eligible for that grant.

These two grants, along with NAHASDA, allowed the tribe to further enhance their drug elimination program to incorporate intervention as well as prevention activities. This was a vital activity to incorporate, as the tribe learned that the majority of the youths were beyond the prevention phase, thus making intervention critical.

Within each funding source, the tribe had specific guidelines and stipulations, which is illustrated by eligible and ineligible activities. IHDEP funds could be utilized for law enforcement salary-related items but not for equipment or uniforms. Through NAHASDA, the tribe was able to use funds for activities that were ineligible under IHDEP. The funds are budgeted to reimburse the Menominee Tribal Police Department for deputized housing officers, uniforms, and police vehicle maintenance. The two funding sources effectively combined to help the tribe achieve its crime prevention objective. Other resources were leveraged from alternate grants as well as for specific prevention and intervention objectives.

Since NAHASDA's inception, the tribe has utilized a total of \$397,000 to finance crime and prevention activities, specifically aiming to increase security. The security objective has allowed an increase in baseline services to the housing development areas of the Menominee Tribal Housing Department.

What was the process of putting the program together?

The Menominee Tribe's drug abuse prevention program is culturally structured and implemented to function with three components, which are prevention, intervention, and security/suppression. All three are driven by community-based collaboration activities designed to eliminate drugs and their associated crimes in the housing communities.

The tribe has identified collaboration to be a definite strength in having an effective and efficient drug elimination program.

In developing a comprehensive program, the process entailed the following:

1. Assessing current position
2. Conducting a community survey
3. Analyzing responses

Prevention activities were designed to increase the age onset for youth involvement in substance abuse and to reduce the juvenile crime in the housing development areas. Most of the prevention program is targeted toward youths between the ages of 8 – 18. Youth prevention is at the same level as adult prevention to prevent a cycle from repeating itself.

In addition, through other prevention resources, the Menominee drug elimination program co-sponsors annual activities that include both youth and adults. The tribe has found that a "one time effort" type of programming does not establish the consistency necessary for long term results. Continuous activities that are in place are as follows:

- Cultural camp: a week-long camp designed to provide drug abuse prevention activities, recreation, and education in a culturally sensitive manner
- Teen retreats
- Recreational tournaments
- After school collaborations

Intervention Activities were designed to reduce recidivism in the court system for juveniles and to provide education for the families with referral systems in place. These activities are as follows:

- Home based intervention program
- Ropes and Challenge Course Drug Free Coalition
- Volunteer Recruitment Campaign

Security/Suppression Activities were designed to identify and reduce peak ordinance violations and to eliminate drugs and their associated crimes from the development areas. These steps included the following:

- Contract developed between housing and police department
- Assignment of housing officers
- Information gathering and data sharing
- Peacekeeper Program – designed to accomplish prevention and intervention

PROGRAM TEAM/ ADMINISTRATION

The team established to carry out the drug elimination program is as follows:

Drug elimination coordinator	<ul style="list-style-type: none"> • Research funding resources • Complete grant applications • Supervise staff • Report/ensure grant compliance
Drug Prevention Specialist	<ul style="list-style-type: none"> • Attend inter-agency meetings • Project Coordination • Certified Instructor
Administrative Assistant	<ul style="list-style-type: none"> • Database entry • Routine clerical duties Filing
Tribal Law Enforcement	<ul style="list-style-type: none"> • Serve as Deputized Housing Officer • Provide security and safety for housing units • Serve as mentors for youth
Housing Department	<ul style="list-style-type: none"> • Drug elimination program is a component under the housing department

LESSONS LEARNED

- Use experiential learning styles. *In developing intervention techniques, active activities were more effective than lecture type activities.*
- Use culturally integrated programming. *A combination of community-based prevention activities integrated with cultural programming proves to be effective in meeting the needs of program participants. Not everyone is traditional about his or her identity.*
- Incorporate oral communication. *Surveys or letters gave a minimum percentage of return. Oral communication created a more personal setting and resulted in community members sharing their views, issues, and needs.*
- Formal collaboration. *Using formal collaboration, such as memorandums of agreement with other departments, pooled resources for program activities.*

The barriers identified by the tribe over the past five years that have impacted the program were as follows:

- Periodic inability to separate politics from good business practice
- Governing bodies lacking expertise
- Intergenerational chemical abuse issues
- Lateral violence (results of intergenerational poverty and victimization of members within the same community)
- Intergenerational unresolved grief issues

Conclusion

The goal of the Menominee drug abuse prevention program is to abolish drug activity and related crimes from Menominee housing communities. The tribe is also moving towards expanding its cooperation agreement with the Tribal Police Department to increase law enforcement in housing areas and improve data collection to effectively assess which services are resulting in reduced drug- and alcohol-related crime. With the abolishment of the Indian Drug Elimination Program, the Menominee Tribe will again have to seek funding to prevent the current program from having a setback. The program will take a budget cut of approximately \$400,000, which will have a huge impact on the Menominee drug elimination program. If the tribe utilizes more NAHASDA funds, this will certainly have an impact on the other components of the housing authority as funding is limited overall.

The Drug Elimination Program evolved into a comprehensive program with prevention, intervention, and security. Within the last five years, the Menominee Tribe went from a budget of \$229,000 to over \$600,000. During this period, the crime index rate within tribal boundaries has decreased by 17%.

Crime prevention and safety activities are an essential component within Indian and Alaska Native housing communities for progressive development. A drug- and crime-free environment will enhance learning and move towards building strong healthy Indian housing communities as well as community development. These strong communities and community development will, in turn, preserve cultural identity.

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CONCLUSION

The Native American Housing Assistance and Self-Determination Act of 1996 sets forth in writing the trust responsibility of the United States government to Native American and Alaskan governments. The act separates Indian housing from public housing and was written to provide federal assistance for Indian tribes that recognize the right of tribal self-governance and self-determination.

These six case studies have clearly demonstrated that having self-determination in their housing programs allowed tribal and Alaska Native governments to be more creative and resourceful to better meet the needs of their people. The projects varied among each tribe, which clearly shows that issues and concerns vary among tribal governments, depending on how sophisticated each community is, as well as other factors such as population, environment, state legislation, and the flexibility of existing government. The research case studies also revealed that with the tribe having more control over their housing issues, tribal governing bodies and tribal councils were more active in representing the housing components as well as more efficient in getting community involvement.

Although tribal governments and Alaska Natives have greater control and flexibility in their housing programs through the eligible activities under NAHASDA, it is still evident that the number one barrier for tribal communities and Alaska Natives is lack of funding. This has been and continues to be the most challenging part in carrying out housing programs. Funding under NAHASDA alone will not address the housing needs of many tribal and Alaska Native communities.

Tribal governments have to leverage other resources in carrying out their housing programs to meet the needs of their people. It is also imperative that tribal governments have the managerial and administrative capacity to do so. Not having these two fundamental components in place will result in mismanagement and arbitrarily lead to incompetence, ineffective programs, and, most of all, a community of people being set up for failure.

As Indian policies and housing programs change, there is a need to continually research and evaluate the impact and effectiveness of these policies and programs for tribal nations and Alaska Native communities to ensure that the needs of Native people are met.