

HUD'S NATIONAL TRIBAL HOUSING SUMMIT

September 1-3, 2026



*Rooted in Tradition:
Rising in Resilience*

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Welcome

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Introduction to Tribally Determined Wage Rates (TDWR)

- What are Tribally Determined Wage Rates (TDWR)
- Prevailing Wage Rate Options Under Indian Housing Programs
- Why use TDWR
- How to establish TDWR



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What are Tribally Determined Prevailing Wage Rates?

On December 27, 2000, NAHASDA was amended to allow Tribes to determine and apply their own prevailing wage rates in their contracts or agreements for the development and operation of affordable housing in place of Federally determined prevailing wage rates.

NAHASDA Section 104(b)(3) Labor Standards



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Statutory Exclusions that Enable TDWR

IHBG Program

- NAHASDA - 104(b) (3) Amendment. Prevailing wage rate, e.g., Davis-Bacon is not applicable if there is a Tribal law requiring payment of not less than prevailing wage rates.
- 24 CFR 1000.16 (e) Labor Standards: Application of Tribal laws.
- Tribe's option to use TDWR or DBA.

ICDBG Program

24 CFR 1003.603

Waives Section 110 of Housing and Community Development Act (HCDA) 1974 which requires Davis-Bacon prevailing wage rates for laborers and mechanics in the performance of construction work.

- Tribe's option to use TDWR or DBA or none (follow Tribal ordinance).

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Minimum Requirements to Enable TDWR

If a Tribe chooses to use TDWRs in place of Davis-Bacon and HUD-determined wage rates they must, by NAHASDA statute:

1. Pass a Tribal law or ordinance.
2. The ordinance must require the payment of not less than those wage rates the Tribe determines to be prevailing.
3. Once the ordinance or law is adopted, the Tribe must certify each year in their Indian Housing Plan (IHP) of their decision to utilize TDWRs. This is to ensure their decision is applicable to current IHBG funds.
 - **Seek HUD guidance on how to complete this certification.**

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Wage Requirements under NAHASDA

- Contracts and agreements for assistance, sale, or lease require prevailing wage rates determined by the Secretary of Labor under the Davis-Bacon Act (DBA) or TDWR to be paid to laborers and mechanics employed in the development of affordable housing
 - Refer to SAM.gov to obtain DBA wage rates
- Davis-Bacon or TDWR wage rates do not apply if NAHASDA funds used to assist homebuyers to acquire single family housing unless there is a written agreement with the owner or developer of the housing that specifies NAHASDA assistance will be used.
 - Ask HUD for guidance if this applies to your project
- HUD-determined wage rates or TDWR are paid to maintenance laborers and mechanics employed in the operation, and to architects, technical engineers, draftsmen and technicians employed in the development of affordable housing
 - Seek assistance from your regional Office of Davis Bacon Labor Standards (DBLS)



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When Would Davis Bacon or TDRW Apply to Assisting Homebuyers' Acquire SF Housing?

Davis-Bacon wage rates do not apply unless there is a written agreement with the owner or developer of the housing that specifies NAHASDA assistance will be used. What to ask yourself:

- Is there a written agreement with the owner or developer of the housing? Are you the developer/owner?
- Is there a written agreement with the owner?
- Is the assistance being used to purchase the home?



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Comparison of Davis-Bacon Act Rules & TDWR for Construction

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Tribally Determined Wage Rates (no dollar thresholds unless specified in ordinance)

- Must be paid Tribally Determined prevailing wages
- Tribe/TDHE determines payroll requirements
- Contract Work Hours and Safety Standards Act (CWHSSA) does NOT apply

Davis-Bacon Wage Rates (contracts over \$2,000)

- Must be paid Davis-Bacon prevailing wages
- Certified and weekly payrolls required
- Contract Work Hours and Safety Standards Act (CWHSSA) applies (overtime)
- Bid/contract documents must contain wages

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Comparison of HUD Determined Wage Rates & TDWR for Operations and Maintenance

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Tribally Determined Wage Rates

- Must be paid Tribally Determined prevailing wages
- Tribe/TDHE determines payroll requirements

HUD Determined Wage Rates

- Must be paid HUD-determined prevailing wages
- Certified and weekly payrolls NOT required (Letter Ruling 2004-01) for TDHE and Tribal Employees

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Options for Wage Rates when using NAHASDA

1. Follow Davis-Bacon & Related Acts construction/rehab using contractors and force account and HUD Determined Wage Rates for operations & maintenance workers, A & E, etc.
2. Follow TDWR for construction/rehab using contractors and force account and maintenance workers, A & E, etc. & TDWR for operations and maintenance
3. Use a combination of both, depending on how you manage your operations and finance and build your projects



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Options for Wage Rates when Using NAHASDA

Activity: Construction or Housing Development

- Tribally Determined Wage Rates
- Davis-Bacon wage rates

Activity: Housing Operation and Maintenance

- Tribally Determined Wage Rates
- HUD-determined wage rates

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Why Use TDWR?

- Serves Tribe's program and project goals
- Opportunity to exercise self-determination and sovereignty
- Allows for self-monitoring of required prevailing wage rates
- Potential impact on administration and costs



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Serves Tribe's Program and Project Goals/Plans

- Tribe's financing models for construction, e.g., some projects are only funded by IHBG
- Tribe's approach to development, e.g., who builds the homes
- Tribe's/TDHE's use of force account labor, e.g., maintenance only or construction
- Tribe's goals for economic/job retention or creation, e.g., opportunity to pay higher of Davis-Bacon or TDWR



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When Can We Use TDWR for Our Projects?

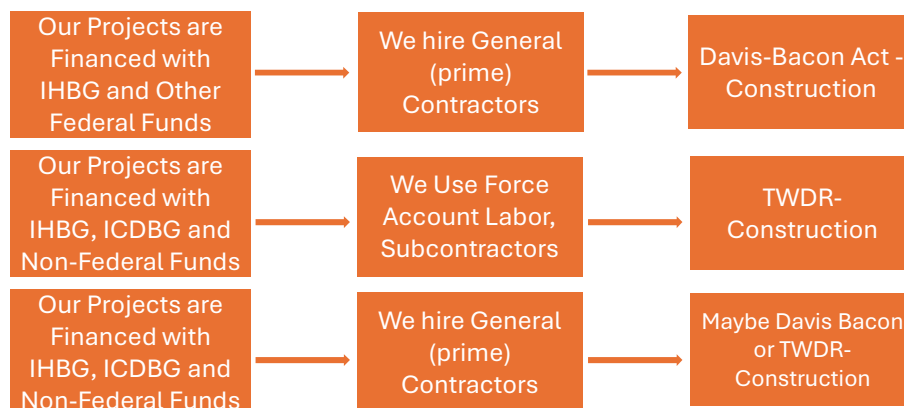
- **Using IHBG Funds Only**
- **Using ICDBG Funds Only**
 - Exempt from Davis-Bacon wage requirements, but you can use TDWR - or DB
- **Blending IHBG Funds and ICDBG Funds**
- **Blending IHBG and Other Funds**
 - Use Davis-Bacon Act wages if blended with other federal funds (or state prevailing wages with state funds) if required by the program
 - Can use Tribally determined wages if blended with non-federal funds, e.g., LIHTC equity



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What is Our Approach?



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Flexibility with Force Account

Job Classifications and Wage Rates

TDWR						Davis-Bacon			
TITLE	Rate	5% COLA	July 2023 Rate	FRINGE 10.82%	TOTAL COSTS	Job Classification (Publication 1/6/2023)	Rate	Fringe	Total Hourly Rate
Carpenter IV	\$12.92	\$0.65	\$13.57	\$1.47	\$15.03				
Carpenter III	\$11.90	\$0.60	\$12.50	\$1.35	\$13.85				
Carpenter II	\$10.94	\$0.55	\$11.49	\$1.24	\$12.73				
Carpenter I	\$10.00	\$0.50	\$10.50	\$1.14	\$11.64	Carpenter	\$ 10.00	\$ 0.30	\$ 10.30
Electrician	\$13.15	\$0.66	\$13.81	\$1.49	\$15.30	Electrician	\$ 12.00	\$ 0.23	\$ 12.23
Plumber I	\$13.15	\$0.66	\$13.81	\$1.49	\$15.30	Plumber	\$ 16.07	\$ 0.65	\$ 16.72



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Opportunity to Exercise Self-Determination and Sovereignty

Tribe creates and adopts its own prevailing wage rate ordinance

- Decides goals for wage rates and how they are applied
- Designates the managing entity
- Decides whether to not to require certified payrolls, interviews, use of apprentices and trainees

Tribe oversees the management and monitoring of prevailing wage rates

- Determines its own prevailing wages
- Develops its own policies and procedures
- Tribe, or its designee, is the monitoring agency



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TDWR Monitoring Requirements

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HUD ONAP will look to Tribe's
monitoring policy for compliance
with TDWR



Follow your TDWR policy and
procedures
Use your required payroll forms
and notices, postings
HUD reporting, such as form 4710
Labor Standards Report, is not
required

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Davis-Bacon Monitoring Requirements

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Management of Davis Bacon
Labor Standards (FPM-DBLS)
monitors compliance for any
contract that is not covered by a
TDWR .

Wage and Hour Division -
inspects records, reports and on-
site interviews & responses to



HUD FORM 4710 Labor Standards
Report Semi-Annual Labor
Standards Enforcement Report is
required.

Certified and weekly payrolls
NOT required (*LR 2004-01*) for
Tribe and TDHE employees.

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How to Establish TDWR

- Minimum Requirements
- What is a prevailing wage rate under TDWR?
- The steps to establishing a TDWR



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Legal Requirements for TDWR under NAHASDA

As stated earlier, to use TDWRs in place of Davis-Bacon and HUD-determined wage rates a Tribes must:

1. Pass a Tribal law or ordinance
2. The ordinance must require the payment of not less than those wage rates the Tribe determines to be prevailing
3. Certify each year in the IHP that to TDWR will be used

The ordinance provisions are key to the success and sustainability of TDWR

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What is a Prevailing Wage under TDWR?

Neither NAHASDA nor HUD defines “prevailing.” In providing for TDWR, practicality requires that the Tribe will have to develop (or reference) their own definitions of what “prevailing” rates are and their own methods for how to make their determinations of prevailing wage rates. The definition can appear in the law or regulation, or in the determining mechanism.

If a Tribe elects to use a Tribally Determined Wage Rate, the Tribe must provide for payment of a Tribally Determined prevailing rate, not merely a “minimum” rate.



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Steps to Establishing TDWR

1. Convene Stakeholders and Resources and Research/Assessment.

2. Make TDWR Decisions and Determine Wage Rates.

3. Develop and Adopt Tribal Ordinance, Policies and Procedures.

4. Implementation: IHP Election & Monitoring

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Step 1: Stakeholders, Research

- A. Stakeholders: Based on traditional or customary practice for input and initiating an ordinance and policies and procedures. Research history of and plans for how housing projects are/will be financed and who builds them.
- B. Assess internal capacity, need for technical assistance and organizational chart for overseeing/implementing TDWR.
- C. If a “go” recommendation for TDWR, make decisions on use.
- D. If required, conduct orientation, education and prepare documents for Tribal Council.



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Step 2: Make TDWR Decisions

Ordinance: Definition of “Prevailing Wages”

- Use DBA definition or
- Develop Tribal definition

Application (scope of work) of TDWRs

- All projects and activities
- Meets a set wage minimum if required
- Just DB projects or also HUD-determined (maintenance)

Implementation, Monitoring, and Enforcement

- Adopt/adapt elements of DB - e.g., wages for different projects
- Interviews and certified payrolls (level of monitoring)
- Contract and contractor requirements under TDWR
- Decide schedule for wage rate surveys

Job Classifications and Rates

- Use DB?
- Develop Tribal Classifications



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Ways to Determine Prevailing Wage Rates under the TDWR

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Examples of ways Tribes can determine, or establish and use, prevailing wage rates. Tribes must define what constitutes "prevailing" wage rates in their ordinance.

Conduct Your Own Wage Surveys

Identify the survey methods and frequency through Tribal ordinance.

Look at Historical Data

Review past contracts.
Existing wage guidelines.

Use Davis-Bacon Rates

DOL establishes the prevailing wage rates (as required in DBA).

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Wage Surveys and Historical Data

Wage Surveys:

- Should include job titles (e.g., carpenters, maintenance supervisor), job descriptions, and required skills/experience
- Can be completed by consultants, staff

Historical Data:

- Review, tally labor wage rate reports from recent previous contracts for construction, as available
- Probably best used for determining initial wage rates



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Step 3: Develop TDWR Ordinance

Elements of a TDWR Ordinance

1. Definitions – must define what prevailing wage rate is for the Tribe. Definition needs to include the word “prevailing.”
2. Purpose and Scope of TDWR , e.g., does it apply to ICDBG or specific projects and volunteers?
3. Applicability of, requirement for, payment of prevailing wages.
4. How and when prevailing wages are established, the frequency of review of wage amounts, and record keeping.
5. Delegation of Tribal Authority – What department or division is responsible for managing and for developing, updating the policies and procedures.
6. Contractor requirements (submittal of payrolls, labor lien releases, posting, etc.) and penalties imposed for non-compliance.



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Step 3: Develop TDWR Ordinance

Elements of a TDWR Ordinance (Continued)

7. Jurisdiction (Tribal Court, Tribal Council).
8. Self-Determination and Sovereign Immunity.
9. Severability.
10. An initial list of job classifications and wage rates, if completed.
11. Defines which, if any, other Federal Labor Standards apply depending on funding.
12. The adopting Tribal Council Resolution is attached to the Ordinance.



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Key Element *Definition* Example

(h) "Prevailing wage" means the wage as determined by the Tribe pursuant to this chapter as the wage prevailing on the Tribe's Reservation and within the Tribe's and Housing Authority's area of operations for each category of employee including, but not limited to, architect, technical engineer, draftsman, technician, laborer, and mechanic.

Note: Limits to On-Reservation and Housing's area of operations.

Key Element: Definitions - Define what prevailing wage rate is for the Tribe. Definition needs to include the word "prevailing."



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Key Element *Purpose* Example

3.36.020 Purposes

a) The Puyallup Tribe desires to establish a Tribal prevailing wage, equal to or greater than Davis-Bacon, for laborers, mechanics, architects, technical engineers, draftsmen, technicians, and other positions which may be designated by the federal government or the Tribe on the Puyallup Reservation and in other areas where the Tribe's Housing Authority undertakes construction projects or administration of affordable housing, in order to promote the general welfare and economic development of the Tribe in exercise of the Tribe's inherent authority and Congressionally delegated authority.

b) Notwithstanding any other provision of Tribal law to the contrary, the prevailing wage established by the Tribe under this chapter is intended to supersede all federal wage determinations otherwise applicable to the Tribe's Housing Authority to the greatest extent allowed under federal law and to the fullest legal authority under Tribal law. [Res. 120707A Art. II (07/12/07)]

Note: Decision to make the wage rates competitive with Davis-Bacon



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Key Element Scope Example

2.11.003 Scope

This Chapter shall cover Skokomish construction projects funded under programs of the Federal Government that would normally be covered by the federal Davis-Bacon Act.

Note: TDWR is limited to IHBG funds.



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Key Element Establishment of Prevailing Wages Example

Section 5.70.080 Determination of Tribal prevailing wage.

Not less frequently than biennially, the Tribe's Human Resources Department, in consultation with affect Tribal departments and entities, shall conduct a wage survey in order to determine the prevailing wage.

- a. The Tribe shall obtain wage rates from available sources of each class of profession or trade included in the survey and shall establish the prevailing wage at not less than the average wage paid to each class of profession or trade included in the survey. The survey shall include the classifications for journeyman, apprentice, and trainee in all trades.
- b. The Tribe shall refrain for not less than two years the names and addresses of all sources contacted and the wage rates reported by each source.
- c. Wage rates shall include salary but not the value of fringe benefits paid to or on behalf of employees [Ord. 29 5103, adopted, 10/12/2012].



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Key Element *Severability and Self Determination/Sovereignty* Example

CHAPTER 71.14 – SEVERABILITY

71.14.01: INVALIDITY CLAUSE

If any provision of this Ordinance, or its application to any person or circumstances is held invalid by the appropriate court of law, the remainder of the Ordinance, or the application of the provision to other persons or circumstances is not affected.

CHAPTER 71.15 – SOVEREIGNTY

Nothing contained in this Ordinance shall constitute a waiver of Tribal Sovereignty or limit the application of Trust Responsibility by the United States Government.



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Key Element *Delegation of Authority* Examples

- **(4) Delegation of Authority.** The Tribe may delegate its authority to conduct surveys and/or to establish the Tribal Prevailing Wage under this chapter to a Department in the Tribe. Council retains the right to review and approve the schedule of prevailing wages.
- **(d) Delegation of Authority.** The Tribe may delegate its authority to conduct surveys and/or to establish the Tribal Prevailing wage under this chapter to the Tribe's Human Resource, Training and Education Division, but Council shall approve the schedule of prevailing wages at least annually by motion or resolution. [Res. 120707A Art. IV (07/12/07)]



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Elements of TDWR Policies and Procedures

1. Department, Contract Administrator or Officer position is designated.
2. Ensure all relevant procurement and contracting documents contain wage decision and, if in ordinance, provision for COLA.
3. What is required in bid, contract documents and posting relative to TDWR.
4. What is required of contractors and how they obtain guidance on TDWR.
5. Sets contractor eligibility process (follows other IHBG requirements, e.g., not debarred).
6. How to conduct on-site inspections and wage interviews and review certified payroll reports (if required by the ordinance).
7. What is required to maintain complete file documentation.
8. Ongoing administration - wage surveys, etc.



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Step 4: Implementation

Recipient informs HUD of its wage rate decision in the IHP and whether it is using Tribally Determined Wage Rates. The recipient certifies to one of the following:

1. The recipient will use Tribally Determined Wage Rates for all construction and maintenance activities involving IHBG funds, or
2. The recipient will use Davis-Bacon or HUD-determined wage rates for all construction and maintenance activities involving IHBG funds, or
3. The recipient will use Davis-Bacon and/or HUD-determined wage rates for some types of construction involving IHBG funds and Tribally Determined Wage Rates for other types of construction involving IHBG funds. Identify the specific IHBG-funded activities that will use Tribally Determined Wage Rates.



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Potential Self Monitoring Issues

1. Failure to follow your Tribal Ordinance or, if adopted, policy/procedures, e.g., not conducting periodic wage surveys, etc.
2. Misclassification of employees
3. Failure to pay full prevailing wage, including fringe benefits, for all hours worked (including overtime hours) as defined in your ordinance
4. Inadequate contract management system, recordkeeping such as not counting all hours worked or not recording hours worked by an individual in two or more classifications during a day
5. Failure to post the TDWR poster and applicable wage determination, if required by the ordinance
6. The Tribal department or entity defined in the ordinance to administer the wage rate system does not have adequate capability or capacity and/or has a conflict of interest in monitoring or managing the requirements or has been dissolved



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Example of a TDWR Process

- What are the current conditions
- What are the 5-year goals
- What do we need to do to reach the goal



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Scenario

- Tribe does not have a Tribal Wage Ordinance and follows DBA for all NAHASDA activities
- Tribe's HR and Planning departments have experience managing DBA as a result of managing other Tribal projects
- Housing programs are scattered site house by house homeowner rehab and new single-family homes
- Goals:
 - Maximize Tribal/TDHE control of and increase capacity to oversee IHBG program
 - Limit duplication of work for TDHE & tribal departments
 - Increase tribal employment by building up skilled Force Account from 5 to 10 FTE within 3 years.
 - Meet rental housing demand
 - Build (20+unit) new construction rental project within 5 years and increase use of more private and federal funds.



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STEP 1 - 2 : Program/Project Financing Plans and Approach & Wage Determinations

Maintenance	House by House - HO Rehab	Rental Projects- 20+ Units
• Financing • IHBG • Approach • Force Account • TDWR	• Financing: • IHBG/ICDBG • Approach • Force Account • MBE/WBE, Local & Indian Licensed Subcontractors • TDWR	• Financing • IHBG, ICDBG, LIHTC, National Housing Trust Fund (State), Program Income • Approach • External General Contractors • Davis Bacon

STEPS 3 and 4: Ordinance, Policies and Procedures, Make IHP Election



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Resources

Program Guidance 2003-03 Application of Tribal Laws Pertaining to the Use of Tribally Determined Wages (TDW):

https://www.hud.gov/sites/documents/DOC_8221.PDF

System for Award Management (SAM): www.SAM.gov

Program Guidance 2004-16 Labor Relations Letters LR 2004-01 and LR 2004-0-2:

https://www.hud.gov/sites/documents/DOC_8217.PDF

HUD Labor Standards:

<https://www.hud.gov/program-offices/davis-bacon-and-labor-standards>

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Examples of Tribal TDWR Ordinances

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Yurok Tribe

<https://yurok.tribal.codes/YTC/5.70>

Bishop Paiute Tribe

<https://www.bishoppaiutetribes.com/tribal-ordinances/>

Puyallup Tribe

<https://www.codepublishing.com/WA/PuyallupTribe/#!/html/PuyallupTribe03/PuyallupTribe0336.html>

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QUESTIONS?



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