



ASSOCIATION OF ALASKA HOUSING AUTHORITIES

Building communities, empowering Alaskans.

EQUITY & ENGAGEMENT FOR TRIBAL HOUSING PROGRAMS

About AAHA

The Association of Alaska Housing Authorities (AAHA) is a 501(c)(3) non-profit organization whose membership consists of 14 Regional Housing Authorities (RHAs) created pursuant to Alaska Statute, and the Alaska Housing Finance Corporation (AHFC). AAHA is dedicated to increasing the supply of safe, sanitary and affordable housing in Alaska. RHA’s serve as Tribally Designated Housing Entities (TDHEs) for 196 Tribes in Alaska and through partnership with AHFC and other state, federal and private sector partners, they provide services to residents and communities across the state, both rural and urban.

Alaska’s RHAs have built thousands of housing units since their inception in 1971. Tens of thousands of Alaskans live in housing built, improved and/or managed by RHA’s. Regional Housing Authorities, along with their partners, are among the largest employers in rural Alaska and play a critical role in sustaining many local economies. They are also a major player in the state’s urban centers – Cook Inlet Housing Authority has built more new, affordable housing in Anchorage in the last ten years than any other organization. Alaska’s economy, urban and rural, benefit from RHAs activities through procuring and purchasing: building materials, supplies, professional services and logistics from mostly Alaskan companies.

While the RHAs continue to provide affordable housing services and development across the state, equity and engagement continue to be challenges in addressing the critical affordable housing shortage we see in Alaska and across Indian Country.

Equity:

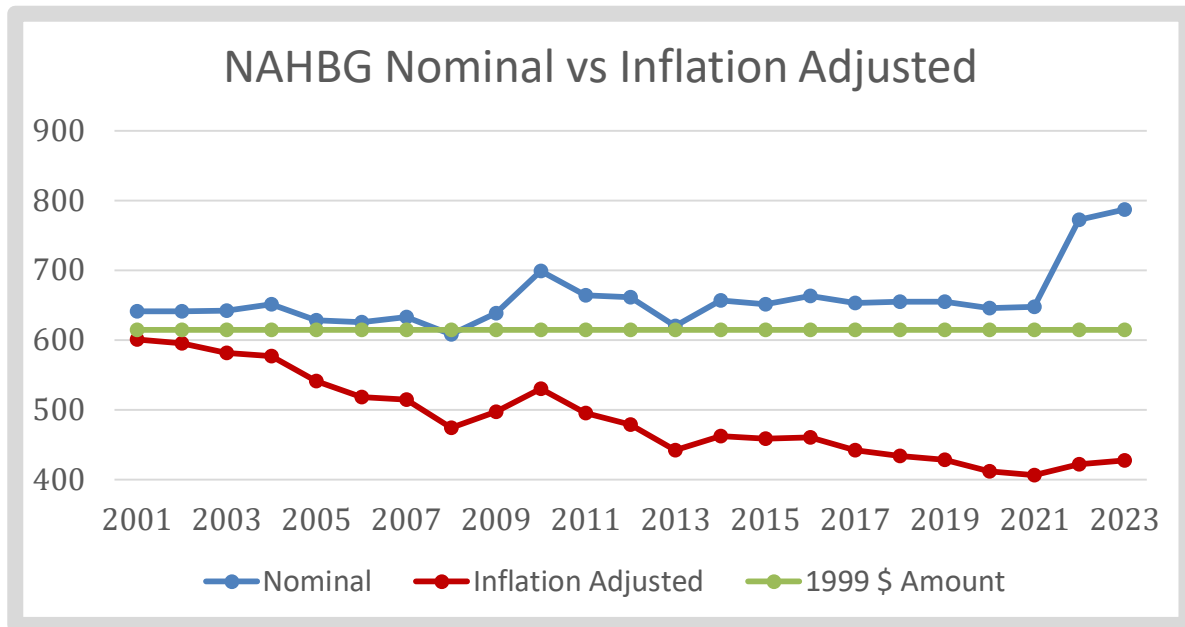
- **Equity** between overall HUD funding and NAHASDA funding.

- For over 20 years Congress has under-funded Native housing so egregiously compared to non-Native housing. Total funding for the overall Housing and Urban Development (HUD) Department has far outpaced NAHASDA programs specifically, and far ahead of inflation. In FY 2001 HUD’s budget was

	HUD OVERALL	NAHBG
2001 Nominal \$	\$26 BB	\$646 MM
2001 % of HUD Budget		2.5%
2023 Nominal \$	\$70.5 BB	\$787 MM
2023 % of HUD Budget		1.11%
% Change in Funding	171%	21.8%
Inflation-adjusted change	+58%	-29%



approximately \$26 billion and the NAHBG specifically was \$646 million. Fast forward to FY 2023, HUD's overall budget authority was \$70.5 billion, and the NAHBG specifically was \$787 million. If Native Housing was funded at parity with inflation, it would be funded at approximately \$1.1 billion for FY 2023. This is key: **all of HUD continues to gained purchasing power above inflation whereas NAHASDA continues to lose purchasing power and has not kept up with inflation. This inequity toward Native people cannot continue.**



- **Equity** with funding distribution in the NAHBG Competitive Program vs. Formula.

- In 2019, the first substantive increase to Native Housing came with the NAHBG Competitive program and although we are appreciative of the additional funding, this program does not provide an increase to the overall NAHBG funding and there are fundamental flaws in delivery and equitable distribution of program funding. Quick and equitable distribution of additional housing funding to native communities is critical and achievable through the NAHBG formula.
- Looking at the chart, we can see the results of the NAHBG Competition. This data belies any claim about fairness in the competition. The way the NAHBG Competitive has been scored is by HUD offices outside of their home region. Having a team from Chicago or

Region	FY '19-'21 Cumulative Overpayment/Loss
Alaska	(\$21,214,566)
Eastern/Woodlands	(\$20,847,408)
Northern Plains	\$19,081,085
Northwest	\$980,574
Southern Plains	(\$12,245,357)
Southwest	\$34,245,671



Maryland scoring applications from Savoonga is completely irrational. If the NAHBG Competitive program was deployed in a manner that was comparable to the NAHBG formula, Alaska and the Eastern/Woodlands regions would have received over \$20MM more. We cannot continue with such a skewed system and the inequitable distribution to Alaska speaks for itself.

- **Equity** for ALL tribes' having the ability to compete for program funding.
 - The NAHBG Competitive program requires lengthy applications, notices, and ultimately delays in distribution (2 years in the first round) and in Alaska, we have heard that every tribe cannot compete for the funding because of the arduousness of the application. This has resulted in vast disparities with the funding distribution between different regions across Indian Country. The outcome is that tribes left-behind for the last 20 years, fall further behind in their ability to deliver safe housing to their families.

- **Equity** to accessing NAHBG Competitive funding.
 - Tribally Designated Housing Entities (THDEs), regardless of size can only submit one application for the NAHBG Competitive program. A TDHE that represents 51 Tribes are competing for the same dollar amount as a single Tribe. This requires that TDHE's pick and choose what Tribe will be able to receive services from the NAHBG Competitive.

Tribal Engagement:

When it comes to Native American Housing programs, Tribes should be engaged when Congress appropriates NAHASDA funds throughout HUD designing, implementing and providing oversight of Native American programs. Tribal Engagement can be through formal Tribal Consultation but it also recognizes that there are Tribal leaders, practitioners and community members that can provide comprehensive policy suggestions and insight into the community's housing needs, collectively.

- **Tribal Engagement** recognizes Tribes' right to determine their needs, rather than Washington D.C. mandating programs that satisfy political priorities.
 - Underfunding of the Native American Housing Block Grant (NAHBG) has led to creating new programs in an effort to get around funding barriers. Programming and flexibility is not the issue. NAHASDA is flexible and provides a mechanism for delivering services in Tribal Communities that fits their unique needs. We face the potential danger of going back to the "1937 Act" way of providing affordable housing services where decisions are made in a vacuum and Tribal input is not considered.
 - Congress or HUD developing new programs is not what Native American communities need, especially if the programs are eligible activities under NAHASDA. New programs create new bureaucracies, introduce inefficiencies and increase overhead within the Tribes.



- o Not all Tribes can use new programs that are narrow in scope. For example, if the Drug Elimination program was resurrected, it would not help the Tribes whose biggest threats may be the Climate Change crisis or lack water and sewer in their communities.
- o **The beauty of NAHASDA is every Tribe/community decides its highest priority and allocates their scarce resources to those needs. This is self-determination, not Washington determination.**

- **Tribal Engagement** is imperative when developing and implementing new programs.
 - o Prior to HUD implementing any new programs for Tribes, under NAHASDA or otherwise, they must engage with Tribes through formal Tribal Consultation, listening sessions and regional conversations to ensure the program guidelines fit for Tribal communities.
 - o Meaningful engagement allows Tribes to provide feedback on substantial policy positions within HUD. This would require HUD to share their intent prior to any engagement so Tribes are aware of potential implications and applicability to their communities.

- **Tribal Engagement** should be initiated to receive feedback.
 - o HUD should request feedback after a program has been implemented to understand the strengths and weaknesses and ensure that it works for all Tribal Communities. This hasn't happened for the NAHBG Competitive program.
 - o HUD should disclose their intent to incorporate feedback and strengthen programs to provide the most benefit for Tribal Communities.

- **Tribal Engagement** must be thorough and complete before HUD requires Tribes to abide by regulations not designed to serve Tribal communities.
 - o Prior to HUD expanding programs, services and mandates, they should understand what implications the regulations will have in Tribal communities.
 - o If programs include erroneous requirements that simply do not work in Native Communities, HUD should consider Tribal exemptions of such regulations.
 - o Prior to HUD's Office of Housing Counseling publishing a final rule that requires Tribes to abide by their Housing Counselor Requirements and regulations, a proposed rule, including any Tribal exemptions, should be thoroughly vetted with Tribal leaders, housing practitioners and other community leaders that will be effected.

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Thank you for considering of our federal focus that will increase the supply of safe, sanitary and affordable housing to our Alaskan Families.



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