

Challenging U.S. Census Data: Guidelines for the Indian Housing Block Grant Formula

U.S. Department of Housing and
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Public reporting burden for the collection of information is estimated to average 150 hours. This includes the time for collecting, reviewing, and reporting the data. The information will be used to allocate funds under the IHBG program. Grant Recipients provide information to correct and/or challenge data used in annual housing assistance formula allocations. Response to this request for information is required in order to receive the benefits to be derived. The information requested is not confidential, as explained at 5 CFR 1320.8(b)(3). This agency may not collect this information, and you are not required to complete this form unless it displays a currently valid OMB control number.

This document outlines the steps HUD requires for a tribe/tribally designated housing entity (TDHE) to challenge U.S. Decennial Census¹ data used in the Needs component of the Indian Housing Block Grant (IHBG) formula.

This document, *Challenging U.S. Decennial Census: Guidelines for the Indian Housing Block Grant Formula*, has been updated based on revised regulations published in the Federal Register, November 22, 2016, and taking effect on December 22, 2016. These regulations were developed through the Negotiated Rulemaking process, which included 24 designated representatives of tribal government (or authorized designees of those tribal governments) and 2 HUD representatives.

As stated in 24 CFR 1000.336, an Indian tribe, TDHE, or HUD may challenge data used in the IHBG formula. The challenge and correction of data for this purpose is an allowable administrative expense under the IHBG program, and subject to the tribe's limit on administrative expenses. An Indian tribe or TDHE that has data in its possession that it contends are more accurate than data contained in the U.S. Decennial Census or American Community Survey (ACS), and the data were collected in a manner acceptable to HUD, may submit the data with proper documentation to HUD.

In order for a Census challenge to be considered for the upcoming Fiscal Year (FY) allocation, documentation must be submitted to HUD by March 30. For example, for a Census challenge to be considered for FY 2019, it must be submitted to HUD by March 30, 2018. A one-year extension to submit FY 2018 Needs data challenges is in place, which means the deadline for FY 2018 is also March 30, 2018.

Since the ACS may revise survey questions from one year to the next, please be sure to use the survey questions in the most recent version of the *Challenging U.S. Decennial Census Data: Guidelines for the Indian Housing Block Grant Formula* when you are preparing to do a Census challenge.

The following frequently asked questions provide general guidance and information that tribes/TDHEs should review before considering conducting a Census challenge. They also discuss the types of data that HUD will accept for a Census challenge. HUD is also in the process of preparing a PIH notice that provides detailed questions and answers about how the implementation of the new data affects the formula Needs variables. HUD strongly recommends that tribes/TDHEs review both documents before conducting a Census challenge.

¹ The U.S. Census Bureau is responsible for conducting the Decennial Census, the ACS and the annual Census Bureau Population Estimates. This document uses "Census" to refer to these three data sources.

Q1: What are the variables in the formula that allocate funds for housing need?

A1: The Needs component of the IHBG formula contains seven variables as defined in §1000.324. The weights and variables used in the formula are the following:

Weight	Variable
11%	Number of American Indian and Alaska Native (AIAN) persons.
13%	Number of AIAN households with incomes less than or equal to 30% of formula median income.
7%	Number of AIAN households with incomes between 30% and 50% of formula median income.
7%	Number of AIAN households with incomes between 50% and 80% of formula median income.
25%	Number of AIAN households over-crowded (more than 1.01 persons per room) and/or without complete kitchen or plumbing.
22%	Number of AIAN households with housing cost burden greater than 50% of formula annual income.
15%	Number of AIAN households with a formula annual income up to 80% of formula median income less the number of Current Assisted Stock (CAS).

The weight indicates the relative importance of a variable. The higher the weight, the more important the variable for allocating funds.

Q2: For some tribes, the formula uses needs of multi-race AIAN persons, and for others, it uses the needs of single-race AIAN persons. In preparing a Census Challenge, should the tribe/TDHE submit both multi-race and single-race data?

A2: Yes, because the tribe/TDHE will not know which set of data will result in a more favorable allocation until the IHBG formula is run with both sets of data and the outcomes of each run are compared. Prior to 2000, the Census required a person to choose a single racial category. Starting in 2000, a person was allowed multiple responses. For example, a person with mixed ancestry could report that they were both AIAN and Asian. Since 2006, the Appropriations Act has directed HUD to run the IHBG formula twice: first counting the needs of all persons who report that they are AIAN, whether they say they are AIAN alone or AIAN in combination with some other race; and then counting only the needs of persons who identify solely as AIAN. A tribe's allocation is based on the definition – either AIAN alone or the broader definition of multi-race AIAN that provides it with a higher share of total funds.

When doing a Census challenge, it is in the best interest of a tribe/TDHE to ask questions in the same way that the Census Bureau does, so that they can report new counts for both single and multi-race AIAN.

Q3: Are the Needs variables based on the number of tribal members?

A3: No. The formula uses counts of all persons/households residing within a tribe's Formula Area who self-identify as AIAN, either alone or in combination with other races, whether or not they are enrolled members of a tribe.

Q4: When conducting a Census Challenge, do tribes/TDHEs have to collect and submit data on all seven Needs variables?

A4: Tribes/TDHEs can choose the variables for which they are going to collect data. However, they cannot submit a subset of the data collected. Once a tribe/TDHE determines the variables for which data will be collected, and collects the data, the tribe/TDHE must provide to HUD the data on all collected variables. A tribe/TDHE cannot provide a subset of data if the survey results in larger counts for some variables and smaller counts for other variables.

Q5: What if the tribe's Service Area is different than the Formula Area currently identified by HUD?

A5: Service Area is a term used by other programs and may mean many different things. For allocating funds, the IHBG program relies on the term Formula Area as defined in §1000.302 Formula Area. The specific geographic units included in the tribe's Formula Area are listed on the tribe's Formula Response Form and on the tribe's Allocation and Formula Data form. The Formula Area that is being used for the tribe can be corrected. Guidance for making this correction can be found in the Formula Response Form under the section titled "Formula Area."

Q6: How does a tribe/TDHE challenge the data?

A6: A tribe/TDHE may challenge the data by providing data collected in a manner acceptable to HUD. These data may come from administrative records (see answers on Tribal Enrollment and Indian Health Service (IHS) data below), or they may come from a survey conducted by the tribe/TDHE. Regardless of whether a tribe/TDHE decides to challenge only the population data or some or all of the household variables, HUD's basic rules for reviewing data submitted as part of a challenge are the following:

- Questions used in the tribal survey must obtain data equivalent to the data that are collected by the Census Bureau (see Attachment A).
- The method of data collection must be unbiased, statistically valid, and acceptable to HUD.
- Census definitions for key concepts must be used (see Definition of Terms), with the exception that the formula identifies a household as AIAN if the household head OR spouse of the household head identify as AIAN.
- A tribe/TDHE must make the surveys and the database containing the survey data and calculations of the Needs variables available to HUD at the time of the Census challenge.

Q7: Will HUD accept Tribal Enrollment numbers?

A7: Yes, HUD will accept Tribal Enrollment data in lieu of the number of AIAN persons listed under the Needs Data section of the Formula Response Form in computing the IHBG formula allocation. However, these data will be accepted only if the Tribal Enrollment data are used by the tribe to disburse significant per capita payments to tribal members, and only if the count is limited to enrolled persons who are living within a tribe's Formula Area. When Tribal Enrollment is used for disbursing funds, there is a built-in incentive to update and purge records on a regular basis.

Q8: Will HUD accept IHS information on utilization?

A8: HUD will accept IHS records in lieu of the number of AIAN persons listed under the Needs Data section of the Formula Response Form in computing the IHBG Formula allocation, but only if the IHS data are made available to HUD. Special tabulations are required to ensure that each person is counted only once (using data associated with their most recent visit), and that only users residing in a tribe's Formula Area are counted. These

data need not include names so that the confidentiality of health records can be maintained, but they must include a unique identifier for each individual, along with information on place of residence and date that health services were last used. Only individuals who used health services within the last three years will be counted.

Q9: What if the tribe’s Formula Area currently includes land that is not part of their Reservation or Trust Lands?

A9: Tribes may have non-Indian lands as part of their Formula Areas. Most often these are “balance of counties” – that is, all the land in a county that is not reservation or tribal trust land. In accordance with §1000.302 Formula Area (2)(iv), Formula Area expansions use the smallest possible geographic unit, so some tribes may have geographic areas defined in terms of balance of Census tracts or county subdivisions. Whenever Needs variables are challenged, a tribe/TDHE may provide a single count for all persons/households living on reservation and trust lands. For non-Indian lands, however, a tribe/TDHE must provide subtotals for each separate component of their listed Formula Area.

Q10: Why would HUD challenge the data used in the IHBG formula?

A10: In order for the formula to be fair for all tribes, HUD has the authority to challenge the data so that one tribe is not receiving a disproportionate amount of funding at the expense of all other tribes. Because the formula is “zero sum,” that is, the total amount of funds available to be allocated by the formula does not change, if one tribe is getting more than its fair share, all of the other tribes are receiving less.

HUD may challenge Needs data for several reasons including but not limited to the following:

1. If a tribe’s Formula Area includes many AIAN persons who are not tribal members, HUD may ask for evidence that the tribe is willing to serve non-tribal members. If the tribe is not willing, HUD would challenge the needs data since only the Needs of tribal members would then be relevant.
2. If HUD is aware of a major change in economic circumstances since the data used in the Formula was collected, it may challenge Needs Data. If, for example, a tribe institutes per capita payments that are large enough to move households above the income thresholds used in the formula, HUD would challenge the formula elements based on Formula Annual Income.²
3. If, following approval of a tribe's Census challenge, there is evidence that the tribe did not collect its data in accord with these guidelines (e.g. they did not limit the Census challenge to AIAN persons living in the tribe’s Formula Area or did not adhere to the definition of key terms), HUD may conduct an on-site review. Depending on the findings, HUD may challenge the tribe's data.

Q11: How can we get help?

A11: The IHBG Formula Customer Service Center at 1-800-410-8808 can provide help in deciding whether a tribe/TDHE should pursue a Census challenge. The Center can also provide methodological support once a decision to pursue a Census challenge has been made.

² Formula Annual Income, defined in the next section, is total household income, from all sources, for all household members.

How to Conduct a Census Challenge

While this document is intended to assist people without a background in survey research in conducting a successful survey that meets the specified objectives, it is strongly recommended that a tribe try to locate a person or organization with research skills to manage the survey. Ideally this person or organization will not be affiliated with the tribe or TDHE. Independent survey data collected by a professional researcher are inherently more acceptable to other tribes and to HUD. For example, if there is a local college, a professor might be persuaded to conduct the survey as part of a course. Regardless of who manages the survey, for the survey data to be accepted by HUD, the survey manager must follow the guidelines below and use the required methodology. Tribes/TDHEs are advised to call the IHBG Formula Customer Service Center during the planning phase.

Definition of Terms

In order to conduct a successful Census challenge, it is helpful to know several key terms and to use the same definitions of these key terms in conducting the survey. Key terms are listed below and, if not followed, will result in an unsuccessful Census challenge. Please use caution when conducting a survey and ensure that the following key terms are properly used.

American Indian and Alaska Native (AIAN) Household: a household where the head of household and/or spouse is an AIAN either alone or in combination with other races. This is a broader definition than what the standard Census tabulations report.

Formula Annual Income: the total income before taxes, from all sources, earned by all household (see Household definition below) members in the last year. This measure can be understood as household income.

The different types of income included in the measure, as well as a few types of income that are excluded, are described in Attachment A: Survey Questions, questions 14a to 14i.

Formula Median Income: income levels defined for each county in a tribe's Formula Area that are used to classify AIAN households into low-income categories. For counties outside of metropolitan areas, formula median income is set at the higher of 1) the county's median income; or 2) the median income of the entire non-metropolitan area of the state. Median income is the value of the "middle" household income: half of the households in the county have a higher income, and half of the households have a lower income.³

The tribe/TDHE does not have to compute formula median income. These data are located at <http://www.huduser.org/datasets/il.html>. Click on FY IL Documentation, then select the appropriate state and then county from the menus to open the PDF file. The three income level variables in the Needs data are based on HUD's most recent FY Income Limits. This site gives income limits by geographic area and household size. ***Tribes/TDHEs must use local area median income, that is, the median income for the county or counties in their Formula Area.*** For each geographic area, the tables show the thresholds that define two of the three income categories necessary to the Needs data: Low Income (between 50% to 80% of median income); and Very Low Income (between 30% to 50% of median income). The third income limit necessary to the Needs data, Extremely Low Income (less than or equal to 30% of median income), must be calculated based on the Very Low Income limit of 50%.⁴

³ Section 567 of the Housing and Community Development Act of 1987 as referenced in §1000.302 Formula Median Income.

⁴ The FY 2014 Consolidated Appropriations Act changed the definition of extremely low-income to be the

Tribes/THDEs should take the relevant value of the Very Low Income limit, multiply it by two (2), and then multiply it by 0.30 to achieve 30% of median income for that county (see example below).

FY 2017 Income Limit Area	Median Income Explanation	FY 2017 Income Limit Category	Persons in Family							
			1	2	3	4	5	6	7	8
Humboldt County	\$76,600	Very Low (50%) Income Limits (\$) Explanation	26,850	30,650	34,500	38,300	41,400	44,450	47,500	50,600
		Extremely Low Income Limits (\$)* Explanation	16,100	18,400	20,700	24,600	28,780	32,960	37,140	41,320
		Low (80%) Income Limits (\$) Explanation	42,950	49,050	55,200	61,300	66,250	71,150	76,050	80,950

The steps to replace the income levels in the Extremely Low Income Line using Humboldt County as an example follows.

- For each family size, take the amount in the Very Low Income line and multiply it by 2 to determine median family income.
- Then multiply that amount by .30.

For Humboldt County household size of 4, the calculation would be $\$38,300 \times 2 \times .3$, which equals \$22,980. You would substitute this amount for the \$24,600 shown in the table. That means, you would use the following income cutoffs when assigning households with 4 people in them to the income categories used in the formula:

HH with incomes $\leq 30\%$ MFI -- \$0 to \$22,980
 HH with incomes >30 to 50% MFI -- \$22,981 to \$38,300
 HH with incomes >50 to 80% of MFI -- \$38,301 to \$61,300

The income limits are specific to a given household size. Therefore, the tables show how much income households consisting of 1-8 persons, respectively, can earn in order to be included as low income in each of the three low-income categories.

In situations where a tribe’s Formula Area includes more than one county, the tribe/TDHE must use the median income for the county where a household is located. The tribe/TDHE may not select the median income for one of the counties and use it to classify households as low income in other counties. Tribes/TDHEs must follow this procedure for determining the number of low-income households for the Needs Data, even if it is different than the income level they use for determining program eligibility.

greater of 30/50ths (60 percent) of the Section 8 very low-income limit, or the poverty guideline as [established by the Department of Health and Human Services \(HHS\)](#). For this reason, the Department does not publish income limits equal to 30% of area median income for all counties; therefore, for Census Challenge purposes, that figure must be derived from the Very Low Income limit (50% of area median) as described.

Household: a person or group of persons who live in a housing unit. **Regardless of how or if the persons living in the housing unit are related, they all count as one household.** For example, a housing unit with three families residing in that unit would be counted as one household, not three households. Likewise, a housing unit consisting of a grandmother, her daughter, her daughter's boyfriend and her daughter's child would be counted as one household.

Over-crowded Households/Households Without Complete Kitchen or Plumbing: a household is counted once if it meets one or both of the following criteria:

1. Over-crowded: a household with more than 1.01 persons per room. The ACS question states: "Rooms must be separated by built-in archways or walls that extend out at least 6 inches and go from floor to ceiling."
 - INCLUDE bedrooms, kitchens, etc.
 - EXCLUDE bathrooms, porches, balconies, foyers, halls or unfinished basements.
2. Without complete kitchen or plumbing: the unit is missing any one of the following:
 - hot and cold running water,
 - a flush toilet
 - a bathtub or shower,
 - a sink with a faucet,
 - a stove or range,
 - a refrigerator.

A household is only counted ONCE if the dwelling is over-crowded *and* without complete kitchen or plumbing.

Severe Housing Cost Burden: households paying more than 50% of Formula Annual Income for housing costs are considered to have severe housing cost burden. This calculation is based on the above definitions of Household and Formula Annual Income. Housing costs vary by type of housing and are defined as follows:

Housing Costs for Homeowners: In the past year: regular monthly mortgage payments; regular monthly second mortgage or home equity loan payments; real estate taxes; fire, hazard and flood insurance; and utilities and fuels -- electricity; gas; water and sewer: oil, coal, kerosene, wood, etc.

Housing Costs for Mobile Homeowners: Everything listed above for homeowners plus personal property taxes, site rent, registration fees and license fees on the mobile home and its site.

Housing Costs for Renters: Monthly rent, and utilities and fuels, which include electricity; gas; water and sewer: oil, coal, kerosene, wood, etc. only if paid by the tenant.

Housing Shortage: the total number of AIAN households with incomes less than 80% of Formula Median Income minus the tribe's CAS. The tribe/TDHE should only submit income information on AIAN households. HUD will base the CAS counts on information in the formula database. To correct CAS information, see Appendix A of the tribe's Formula Response Form.

Distinguishing between Single- and Multi-Race AIAN

Tribes/TDHEs need to be able to distinguish between single- and multi-race AIAN. Single-race AIAN are persons who, when asked their race, state only that they are AIAN. Multi-race AIAN are persons who identify as being AIAN as well as some other race (e.g. black, Asian etc.)

In a Census challenge, it is important for tribes/TDHEs to report separate estimates for each of the challenged Needs variables by single-race and multi-race AIAN. This is because the IHBG allocation formula is calculated two times, once using single-race Needs data and once using multi-race Needs data (which includes everyone who identifies as AIAN), and each tribe's allocation is based on the higher of the two calculations. **If a tribe's/TDHE's Census challenge submission does not provide separate estimates for Needs variables for single race and multi-race AIAN, then the Needs data will be used only as an estimate of the multi-race Needs variables. This may be disadvantageous for tribes, particularly for those tribes whose allocation is typically based on single-race data.**

In order to submit separate Need variables estimates for single and multi-race AIAN in their Census challenge survey, tribes/TDHEs must distinguish between individuals who identify as AIAN alone and those who identify as AIAN in combination with one or several other races. The survey in Attachment A: Survey Questions, question 2, asks for the race of each person in the household. The response choices are: AIAN alone, AIAN in combination with other races, and not AIAN – other race only. In order to do separate calculations for single-race and multi-race AIAN individuals and households, tribes/TDHEs should have households complete question 2 for all household members. In addition, tribes/TDHEs need to ask question 3, race of head of household and/or spouse, and make sure to indicate whether the head of household or their spouse is AIAN alone or in combination with other races.

When a tribe/TDHE calculates Needs variables based on the survey data, they need to do separate calculations for households with a single-race AIAN head and for households with a multi-race AIAN head. A tribe/TDHE that uses Attachment C, Formula Needs Worksheet for Census challenge, can complete two sets of worksheets, one for households headed by a single-race AIAN, and one for households headed by a multi-race AIAN.

Procedures for Conducting Household Surveys

Step 1 – Identifying AIAN Households in the Tribe’s Formula Area

To challenge the data, a tribe/TDHE first must assemble a list of all occupied residential housing units in the tribe’s Formula Area as defined by HUD and shown on the tribe’s Formula Response Form. Tribes/TDHEs may use an aerial survey to identify all the housing units in the tribe’s Formula Area. If the tribe/TDHE uses this method, it then must verify that all the units included in the sampling frame are residential units and that they are occupied. This process will entail looking at any questionable units to confirm that they are residential and currently occupied. The aerial survey is an excellent way to get an accurate listing of all occupied residential units. Alternatively, tribes/TDHEs that cannot use this method may use their Tribal Enrollment list to assemble a list of all occupied residential housing units. Tribal Enrollment lists or other information sources must be accurate and up-to-date, and must include addresses so that the tribe/TDHE can identify and include only those tribal members who live within the tribe’s Formula Area. The Needs data variables are based on all AIAN households, including members of other tribes, who live in the tribe’s Formula Area. Therefore, if a Tribal Enrollment list is used, it can be augmented with other sources of information so that all AIAN households have the opportunity to be counted. It is important to develop the most comprehensive list of households possible within the tribe’s Formula Area. It will not be a problem if non-AIAN persons and households are included in the survey. When the data are tabulated, non-AIAN persons will not be counted for the population data challenge, and non-AIAN-headed households will not be included in counts for the income or housing variables.

This is the most important step in preparing a challenge to the Census data. There will be an undercount if every household in the tribe’s Formula Area cannot be identified. In fact, the Census Bureau makes rigorous, ongoing efforts to assemble a complete list of addresses/locations. The more remote the area, the more difficult it is to assemble a complete list of addresses/locations. However, while the tribe/TDHE wants to avoid an undercount, care must be taken to limit the list to households within the tribe’s Formula Area.

Step 2 – Deciding Whether to Enumerate or to Sample

Depending on the number of households identified in the tribe’s Formula Area, a tribe/TDHE may decide to survey every household (enumerate) or to survey a sample of households. The purpose of sampling is to survey a portion of the population in order to make estimates about the entire population. If the proper questions are asked of a randomly drawn sample of adequate size, the degree of accuracy of overall estimates is reasonably certain. It is critical that the sample be truly random. It is especially important that there be no systematic bias. For example, a tribe/TDHE cannot exclude households in remote areas or those for which they cannot identify home or cell phone numbers, or do anything that might over- or under-represent any income or other known group in the population.

Most Census challenges to date have been based on surveys of all identified AIAN persons, in other words, on enumerations. HUD has directly substituted the tallies from the tribal surveys for the Census counts. If a tribe/TDHE is asking HUD to use actual tallies from the survey, HUD will not worry about response rates or response bias, since no claim is being made that survey respondents are representative of a larger population.

For some tribes, however, this approach may not be realistic. HUD will consider challenges based on surveys of a sample of people living in the Formula Area. However, for these challenges to be approved, rigorous adherence to scientific sampling is required.

Step 3 – Deciding on the Sample Size

In deciding on the size of the sample, a tribe/TDHE should anticipate a certain degree of non-response. The highest level of non-response generally considered to be acceptable is 30 percent, **so a tribe/TDHE needs to achieve at least a 70 percent response rate.** Therefore, a tribe/TDHE that wants, for example, 800 completed surveys should actually draw a sample of at least 1,143 households (800 divided by .70). In this case, a 70 percent response rate would net 800 completed surveys.

When deciding on the size of the sample, tribes/TDHEs also should consider the number of non-AIAN households in their Formula Area. **Tribes/TDHEs need to complete the number of required surveys (discussed below) with AIAN households.** Therefore, using the example above, if a tribe/TDHE wants 800 completed surveys, and only 75 percent of the households in their Formula Area are AIAN, they should draw a sample of at least 1,524 households (800 divided by .70 to account for non-response, which nets 1,143 households; and then 1,143 divided by .75, which comes to 1,524 households.)

As described below, tribes/TDHEs should plan to make repeated attempts to contact each household in the sample in order to maximize response. All tribes/TDHEs should complete surveys with at least 70 percent of sampled households. The higher the response rate, the more confidence that survey results are representative of all households in the tribe’s Formula Area. It is preferable to put resources into getting a higher response rate from a somewhat smaller sample rather than a lower response rate from a larger sample, because the data in the first case would be more accurate, provided the tribe/TDHE completes the required number of surveys with AIAN households.

Tribes with 575 or More AIAN Households in their Formula Area:

Tribes with at least 575 AIAN households can randomly sample households in their Formula Area, provided they complete at least 400 surveys with AIAN households and achieve a 70 percent response rate. For 400 completed surveys, the margin of error is +/-5 percent, which means that results could vary by 5 percent in either direction due to sampling error. This level of error is reasonable for estimating the Needs variables. With fewer completed surveys, the margin of error is considerably larger. With more completed surveys, the margin of error decreases very slowly.

Tribes with Fewer than 575 AIAN Households in their Formula Area: These tribes/TDHEs should attempt to contact all households in their Formula Area. If resources do not permit, they should attempt to contact a random sample of as many households as they can and achieve at least a 70 percent response rate.

All tribes need a high response rate: 70%

Tribes with fewer than 575 AIAN households should attempt to contact all households.

Tribes with 575 or more AIAN households may choose to select a random sample of households. However, they need to complete surveys with at least 400 AIAN households.

If a tribe/TDHE completes surveys with 70 percent or more of the households in its sample, assuming that all other criteria are met, HUD will extrapolate the data to the entire population, provided: 1) the initial listing of households is representative of all households in the tribe's Formula Area, and 2) the tribe/TDHE demonstrates that it used rigorous scientific sampling.

If a tribe/TDHE completes surveys with less than 70 percent of sampled households, assuming that all other criteria are met, HUD will use the data the tribe/TDHE collects as the Needs data, but will not extrapolate the data to the entire population unless the tribe/TDHE can demonstrate that there is no response bias.

Step 4 – Drawing a Random Sample

If a tribe/TDHE decides that there are too many households in the Formula Area to attempt to survey all of them, the tribe/TDHE should draw a random sample. This ensures that every household has a known, typically equal, chance of being included in the sample.

The easiest way to select a random sample is to use systematic sampling. The sampling frame must consist of households, not individuals, since the Needs variables are based on AIAN households. All households should be listed, but no household should be listed more than once. The list should not be ordered in any way that is related to the Needs variables. For example, the list should not be ordered based on how much assistance the household is receiving from the tribe. The tribe/TDHE should describe how the households are listed, to provide documentation that the sampling is random.

To draw a systematic sample, determine the sampling interval by dividing the number of households by the desired sample size. For example, if the list contains 3,000 households and the tribe/TDHE wants a sample of 1,000 households, the sampling interval would be 3,000/1,000, or three. This means that every third household on the list would be chosen.

An alternative method relies on random numbers. In this instance, the tribe/TDHE assigns a number to each household on the full list. Then, using a random number table (which can be found in most statistics textbooks) or using the random number function in a spreadsheet program, the sample is selected.

Step 5 – Selecting the Type of Survey

The most commonly used surveys are: (a) telephone surveys, (b) door-to-door surveys, and (c) mail or drop-off surveys. Both telephone and door-to-door surveys involve interviewers. Mail or drop-off surveys are self-administered. That is, the respondent completes the survey on his or her own. Surveys conducted by interviewers have several advantages over self-administered surveys. First, interviews are better than self-administered surveys for dealing with complicated issues and for asking complex or confusing questions. The respondent's interaction with the interviewer permits clarification of questions when respondents do not understand them, thus enhancing the accuracy of response. Second, because interviewers receive training, interviews are a better method for administering surveys that contain skip patterns, questions that apply to only some respondents. Third, some persons may have difficulty with a written survey. Fourth, particularly in the case of in-person interviews, the interviewer can establish rapport with the person being interviewed. This may increase the number of completed surveys. Overall, using an interviewer increases the likelihood that quality data are collected.

However, there are difficulties in conducting a telephone survey. Many households no longer have home telephones. Therefore, it is necessary that the tribe/TDHE have up-to-date cellular telephone numbers for the head of household or his/her spouse. Furthermore, since only one interview can be conducted with each household, it is crucial that interviewers complete a survey with only one individual residing in each household.

Mail and drop-off surveys can be done confidentially as well. Surveys can be returned with nothing other than an identification number to identify the household. It is critical to identify households in any type of survey so that the tribe/TDHE can demonstrate that only households in the tribe's Formula Area are included in their results. The survey manager can match the identification number to the returned surveys to identify which households have responded and which need follow-up contacts, but actual responses can be separated from any individual or household. However, mail or drop-off surveys usually have a low response rate even with repeated follow-ups, and may yield incomplete or inconsistent data that need to be discarded. Given the complexity of the survey instrument and the likelihood that persons may need help in completing the survey, mail or drop-off surveys are not recommended.

Telephone and in-person interviews cannot be anonymous because the interviewers know the persons that they have contacted. However, they can be confidential. The interviewers should emphasize to respondents that their answers will be kept confidential, and that the interviewer and anyone else associated with the survey will not reveal the answers of any individual or household. People are more likely to give honest answers, especially to sensitive questions about topics such as income, if they are assured that their responses will not be revealed. Interviewers and everyone else associated with the survey effort must maintain this confidentiality. Usually, the respondent's name, address, and telephone number appear only on a cover sheet. After the interviewer has completed the in-person or telephone interview, the cover sheet is separated from the actual survey. This helps to ensure the confidentiality of the information collected. However, it is essential that a unique identifying number be recorded on both the cover sheet and the questionnaire. This ensures that when they submit the data to HUD, the tribe/TDHE can list the addresses of surveyed households and demonstrate that they are within the tribe's Formula Area. If some surveys were completed with households outside of Formula Area boundaries, it would be possible to exclude these individual surveys rather than declare all of the results invalid. In addition, the survey manager should track which households completed interviews and which households need follow-up contacts.

Of course, it is possible, and often quite useful, to combine several types of surveys, provided that only one interview is conducted with each household. For example, if in a door-to-door survey someone is not home, the interviewer can leave a note for the head of household or his/her spouse to call the researchers and schedule a time when he or she will be available to be interviewed, either in-person or by telephone. Alternatively, the telephone can be used to schedule a time when an interviewer will visit the household to conduct an interview, or the interview can be conducted over the telephone when the resident is reached. Or, a letter can be sent to residents of the target area to let them know in advance when an interviewer will call or visit.

Step 6 – Developing the Survey Instrument

After deciding on the survey method, the survey instrument should be developed. Attachment A: Survey Questions includes the list of questions needed to challenge the data used in the IHBG formula. It is important that all of the individuals surveyed are asked exactly the same questions and that their responses are recorded correctly. Each question should be clear, written in simple language, and convey only one meaning. Given the importance of asking the correct questions, it is strongly recommended that tribes use the questions listed in Attachment A: Survey Questions. Please note that Attachment A was written assuming that the survey would be administered by an interviewer. If it is intended to be self administered, additional instructions may be required.

The table below shows which questions need to be included in a challenge of each Needs component variable.

Matrix of Questions in Attachment A Needed to Challenge Each Needs Component Variable																	
Needs Component Variables	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10	Q11	Q12	Q13	Q14	Q15	Q16	Q17
# AIAN Persons	X	X													X	X	X
# AIAN households income <= 30% Formula Median Income	X	X	X											X	X	X	X
# AIAN households income >30%-50% Formula Median Income	X	X	X											X	X	X	X
# AIAN households income >50%-80% Formula Median Income	X	X	X											X	X	X	X
# AIAN households over-crowded or without complete kitchen or plumbing	X	X	X	X	X										X	X	X
# AIAN households paying more than 50% of Formula Annual Income for housing costs	X	X	X			X	X	X	X	X	X	X	X	X	X	X	X

As part of its preparation for the survey, the tribe/TDHE should develop an introduction to the actual interview. This should be a standard introduction that identifies the purpose of the survey and why it is important to respond. It is also a good idea to note the expected amount of time it will take to complete the survey.

For IHBG formula purposes, only AIAN-headed households can be included in the Needs variables identifying low-income households, over-crowded households, and households with severe housing cost burden. However, if the tribe/TDHE wishes to use survey data for other purposes, the tribe/TDHE may want to ask everyone in the sample to complete the entire survey, including non-AIAN-headed households, since such households may include AIAN individuals.

Step 7 – Conducting the Survey

To carry out the survey, the tribe/TDHE has to generate a sufficient number of questionnaires, hire a survey manager, recruit and train interviewers or develop a system for mailing out surveys, follow-up with non-respondents, and develop procedures for editing and tabulating the data.

Publicity. To promote participation in the survey, it may prove worthwhile to arrange some advance notice. A notice in a local newspaper or announcements at a tribal meeting can let people living in the tribe’s Formula Area know that a survey is being conducted. In addition, the tribe/TDHE might send a letter to all the households in the sample to let them know they will be asked to participate in a survey. People are more likely to cooperate if they are informed in advance how and when they will be contacted, and why it is important to the tribe that they participate.

Recruiting and Training Interviewers. It is best to choose interviewers who make the respondents feel comfortable. This will enhance response as well as increase the likelihood that respondents answer questions accurately. When interviewers have similar cultural backgrounds as the respondent, the survey usually generates a better response rate and more accurate results. What is most important, though, is that the interviewer carefully follows respondent selection procedures, commands the attention and respect of the respondent, asks the questions exactly as they are written, and accurately records the responses as given.

Interviewers for telephone and in-person surveys must be thoroughly trained before they go into the field. Anyone who is willing to follow the established procedures can serve as an interviewer so long as they are trained. Prior to beginning the regular interviews, the survey manager should bring the interviewers together for one or more training sessions. Interviewer training should include training in the following:

- The purpose of the survey and why it is important for respondents to participate.
- How to encourage respondents to participate.
- The definition of critical terms including household, AIAN household, and Formula Annual Income, and an understanding of how to apply these terms. For example, an interviewer must understand how to count the number of persons living in a residence, and who and what to include when determining Formula Annual Income.
- The Needs variables, including the way each variable is measured and the survey questions that comprise each measure. This will enable interviewers to help respondents provide accurate information.
- The protocol for contacting respondents including number and timing of attempts.
- Reading the survey aloud until they are comfortable with the instrument, able to read all the questions quickly and smoothly, familiar with all the interviewer instructions, and able to determine which questions apply to which respondents.
- Learning how to read questions in a neutral fashion and how to interact with respondents in a way that does not bias the results.
- Learning how to listen to responses and to record answers correctly.
- Learning how to ask follow-up or probe questions if the respondent fails to answer the question or gives a response that is unrelated to the question that has been asked or that is clearly not accurate.
- Learning how to review each survey immediately after completing it to verify that all items are complete, correct and legible.
- Practicing conducting interviews with the survey manager and with each other.

Response Protocol. The response protocol determines who in the household should be interviewed, as well as procedures for contacting households.

The interviewer first has to determine that the person being interviewed is knowledgeable and competent to answer the questions being asked. The interviewer should ask to speak to the head of the household or the spouse of the head of the household. This is especially important if the tribe/TDHE is challenging all Needs variables and asking income-related questions. If the survey is limited to identifying household occupants and housing characteristics, the protocol may allow the interviewer to speak with other resident adults or children of at least high school age.

Interviewers should attempt to contact respondents at a time when they are most likely to get a high rate of response from most types of people. In general, the tribe/TDHE will know best when community members can be reached. It is recommended that interviewers follow set procedures regarding the number of times they will attempt to reach each household before it is considered “unreachable” and how contact attempts are recorded. Avoid selecting a time or method that will yield biased results. For example, conducting most of the interviews during school breaks may cause many of the households with children to be missed, and conducting the majority of interviews during the day will cause employed persons to be missed.

Since it is extremely important to maximize response, it is recommended that interviewers make at least five or six attempts to reach each household in a telephone survey, and at least three or four attempts to complete an in-person interview. Likewise, it is best if interviewers call or visit on at least three or four different days and at different times of day. For example, the day can be divided into three time periods – morning, afternoon and evening – and interviewers can make several attempts to complete the interview at each time of day. Interviewers should make some calls or visits on weekends as well as on weekdays.

Interviews should *not* be conducted at public gatherings such as festivals, farmer's markets, school events, etc. unless the interviewers have a demonstrably clear and accurate system for ensuring that only one person from each eligible household is interviewed.

Follow-Up. With mail/drop-off surveys, reminder cards should be sent to each household soon after they receive the survey indicating the importance of the information. If they do not respond within 10 to 14 days, a second survey should be sent/dropped off. If they still do not respond, do a third mailing/drop off. With each additional attempt to reach a household, some response can be expected. It is critical to send/drop-off another survey because they might have disposed of or lost the original. If there is still no response after a third mail or drop-off attempt, a telephone interview should be attempted or an in-person interviewer should be sent.

Last Resort Information Collection Procedure. The survey manager can establish a procedure for collecting information when no individual in a household is available. This procedure is called collecting last resort information. The survey manager may introduce a rule for getting information about occupied dwellings when it is impossible to get answers directly from the residents. Imagine that there is a dwelling that is known to be occupied. Either the residents refuse to speak with any interviewer, no one is found at home after repeated calls and/or visits, or they fail to return a survey after three or four follow-up mailings. As discussed earlier, if residents don't return a mail survey, a telephone or in-person follow-up can be attempted. If they still cannot be reached, the interviewer or survey manager can ask a neighbor or a family member who does not live in the household for some minimal information about the residents, such as how many individuals live there and if they are AIAN. Do not ask the knowledgeable person any questions about income. When an interview is conducted with someone other than the household head or spouse, the interviewer should document who they interviewed on the survey (e.g., another household member, a neighbor, a family member who does not live in the household, etc.) as well as how many AIAN persons were counted through this last resort data collection method. This method can only be used to determine the AIAN population count and to estimate the number of AIAN households in the Formula Area. It cannot be used to determine or estimate the number of AIAN households in each of the low-income categories or to determine the number of AIAN households facing a severe housing cost burden. However, external informants may be able to report on households lacking a complete kitchen or plumbing.

The Interview. Interviewers should read the questions exactly as they are written. If the respondent does not understand the question or gives an inadequate answer, it usually is best to have the interviewer pause and wait expectantly for more information or to repeat the question. Questions should be read in the order in which they are written. Interviewer should never prompt or encourage respondents to give any particular answer, and they should never act as if some responses are more or less appropriate or acceptable.

The respondents' answers should be recorded neatly and accurately immediately as they are provided. At the end of each interview, and before proceeding to the next interview, the interviewer should always review the questionnaire to be sure that he/she has asked every required question and entered every answer correctly. This simple check helps to avoid the frustrating mistake of having gone to the time and expense of conducting the interview, but without getting the necessary information. When completing an in-person interview, the interviewer should ask for the respondent's telephone number. This way, if there is a problem with any of the responses, the interviewer or survey manager can contact the respondent by telephone to clarify the data. While

responses to an in-person or telephone interview cannot be anonymous, the interviewer can assure the respondent that his or her answers will be kept confidential. The interviewer can tell respondents that their responses will be grouped and reported as a total, and that no specific responses will ever be connected to them.

Editing. The completed surveys should be provided to the person who will tabulate and analyze them. He/she should review each survey to ensure that each question is answered once and only once in a way that is clear and unambiguous, and that the data are consistent and complete. For example, a respondent might say that his or her household pays \$1,000 mortgage each month, but then report that the household has no income. In this case, the interviewer should try to learn how the household gets the money to pay the mortgage.

If the survey is conducted in-person or by telephone, unclear responses may be resolved by the interviewer. It may be necessary to call the respondent back to clarify incomplete or ambiguous responses. Note that editing is an ongoing process. Even after starting to tabulate or analyze the data, errors or inconsistencies may be discovered that need to be corrected.

Step 8 – Analyzing the Data

After the data have been collected and edited, the tribe/TDHE needs to tabulate the responses from the questionnaires and calculate the information needed for the formula. **Note that, before the surveys are tabulated, it is essential to confirm that there is only one completed survey for all members of a given household.**

The data can be tabulated by completing the worksheets provided in Attachment C: Formula Needs Worksheet for Census Challenge. Again, be sure to assign each completed survey a unique survey identification number. This will allow you to check and correct any inconsistencies or other data problems that may arise when the data are analyzed.

Tabulation. For ease of processing, it is important to enter the responses onto a computer, if one is available. A database program such as Microsoft Access[®] or a spreadsheet program such as Microsoft Excel[®] work well.

References. Fowler, F.J. *Survey Research Methods, Fifth Edition.* Thousand Oaks, CA: Sage, 2014, is a clearly written book that may be helpful.

Babbie, Earl. *The Practice of Social Research, Thirteenth Edition.* Belmont, CA: Wadsworth Publishing Company, 2013. This is a basic textbook on research methods, and it includes easy to understand discussions of sampling, survey design, data collection, data entry and data analysis.

Please note that these books and others that are similar may be available in a local public or university library.

Step 9 – Preparing the Submission for HUD

In order to be considered for a Census challenge based on survey data, a tribe must submit the information outlined below.

1. The name, organization, and contact information for the person(s) who managed the survey.
2. The source(s) of data for the addresses in the Formula Area with a clear explanation of how the addresses were obtained and verified.
3. The actual addresses surveyed, the geographic areas of the addresses (by balance of county, reservation, and/or trust land), and the number of addresses you identified in each of these areas.

Include a map or maps of the geographic area being surveyed. Maps are available from <https://www.census.gov/geo/maps-data/> web site or equivalent. The tribe /TDHE must provide evidence that all of the addresses are within the tribe's Formula Area as defined by HUD and shown in the tribe's most recent FY Formula Response Form or Allocation and Formula Data form. If you believe that the tribe's current Formula Area is incorrect, please refer to Question 4 on page 2 and Question 8 in page 3.

4. If applicable, the number of households sampled in each geographic area and the number of households identified as AIAN, if known. If the tribe uses a sample, it must specify how the households/addresses in the lists are ordered and how the sample was selected.
5. The number of AIAN-headed and non-AIAN-headed households responding in each geographic area.
6. Documentation that the tribe/TDHE used the appropriate definitions as described in the section, Definition of Terms beginning on page 5.
7. A copy of the questionnaire used. (It is strongly recommended that the tribe use the survey provided in Attachment A.)
8. An explanation of the survey method(s) including information on the following:
 - a. Type of survey – telephone, including whether you used home and/or cell phones and how you obtained these numbers; in-person; mail; or some combination.
 - b. Number of repeat attempts before dropping a household from the sample.
 - c. Description of recruitment and training provided for interviewers.
 - d. Description of quality checks performed to assure the accuracy of the data collected.
 - e. Description of how you ensured that there is only one completed survey per household.
9. The Formula Median Income for each geographic area (typically counties) in the tribe's Formula Area and the source used to obtain median income. In determining the number of AIAN households falling into each income category, income limits designated by HUD for the size of each household must be used (see Definition of Terms, "Formula Median Income"). If a tribe's Formula Area includes more than one county or geographic area, the tribe must appropriately apply the formula median income limits for each county or geographic area.
10. Send HUD a table with the results. **The tribe/TDHE must submit information for all of the Needs variables for which it collected information.** It should state clearly which Needs variables are being challenged and provide the tabulations for all of the challenged Needs variables in the table. The Needs variables include:
 - a. Number of AIAN persons
 - b. Number of AIAN households with incomes less than or equal to 30% of Formula Median Income.
 - c. Number of AIAN households with incomes between >30% and 50% of Formula Median Income.
 - d. Number of AIAN households with incomes between >50% and 80% of Formula Median Income.
 - e. Number of AIAN households that are over-crowded (more than 1.01 persons per room) and/or without complete kitchen or plumbing.
 - f. Number of AIAN households paying more than 50% of their Formula Annual Income for housing costs.

It is strongly recommended that a tribe/TDHE submit the above data separately for individuals (a) and households (b-f) that are single-race AIAN and multi-race AIAN. This will permit HUD to run the formula allocation twice, once with single-race and once with multi-race Needs data, and base tribes' allocations on the higher of the two estimates.

11. Tribes/TDHEs must provide the survey instrument, the database containing the survey data, and all of the calculations of the Needs variables at the time they submit a Census challenge.

All challenges should be sent to:

IHBG Formula Customer Service Center

1875 Connecticut Ave, NW, 10th Floor

Washington, D.C. 20009

Toll Free: 800-410-8808

FAX: 202-393-6411

E-mail: IHBGformula@firstpic.org

ATTACHMENT A: Survey Questions

____ Survey ID

- 1. How many people are living or staying at this address?** Count the TOTAL NUMBER of persons who usually live here, whether they are members of the same or different families. For example, a housing unit with three families residing in it is counted as ONE household, NOT three.

INCLUDE in this number:

- Everyone who is living or staying here for more than two months
- INCLUDE yourself if you are living here for more than two months
- INCLUDE anyone else staying here who does not have another place to stay, even if they are here for two months or less

DO NOT INCLUDE in this number:

- Anyone who is living somewhere else for more than two months, such as:
 - A college student living away while attending college
 - Someone in the Armed Forces on deployment

TOTAL NUMBER of persons in household _____

- 2. What is the race of EACH person in your household?** For each household member, please tell us if they identify themselves as American Indian or Alaska Native, also called AIAN, either alone or in combination with other races? Other races include: White; Black or African American; Asian Indian; Chinese; Filipino; Japanese; Korean; Vietnamese; Other Asian; Native Hawaiian; Guamanian or Chamorro; Samoan; other Pacific Islander; or some other race.

Persons in Household	AIAN Alone	AIAN in combination with other races	NOT AIAN – other race only
<i>Check ONE response for each person in the household.</i>			
Person 1			
Person 2			
Person 3			
Person 4			
Person 5			
Person 6			
Person 6			
Person 7			
Person 8			
Person 9			
Person 10			

- 3. Does the head of household and/or their spouse identify themselves as AIAN either alone or in combination with other races?** The “head of household” is the person living or staying here in whose name this house, apartment or mobile home is owned, being bought, or rented. Check “YES” if EITHER the head of household OR their spouse is AIAN alone or in combination with other races.

- ___ YES, AIAN, either alone or in combination with other races
 ___ NO, both head of household and spouse do NOT identify as AIAN

4. How many separate rooms do you have in THIS house, apartment, or mobile home? Rooms must be separated by built-in archways or walls that extend out at least 6 inches and go from floor to ceiling. INCLUDE bedrooms, kitchens, etc. EXCLUDE bathrooms, porches, balconies, foyers, halls or unfinished basements.

_____ Total Number of Rooms

5. Does THIS house, apartment or mobile home have: (Circle “YES” or “NO” for each question)

a. Hot and cold running water	YES	NO
b. A flush toilet	YES	NO
c. A bathtub or shower	YES	NO
d. A sink with a faucet	YES	NO
e. A range or stove	YES	NO
f. A refrigerator	YES	NO

6. What are the ANNUAL costs of utilities and fuels for THIS house, apartment, or mobile home? Please tell us your cost for each of the following in the past year. If you have lived here for less than one year, please estimate the annual cost.

a. Electricity

\$_____ Cost for the Past Year -- Dollars

OR

_____ Electricity is included in rent or condominium fee

_____ No charge or don't use electricity

b. Gas

\$_____ Cost for the Past Year – Dollars

OR

_____ Gas is included in rent or condominium fee

_____ Gas is included in the electricity payment entered above

_____ No charge or don't use gas

c. Water and sewer

\$_____ Cost for the Past Year – Dollars

OR

_____ Water and sewer are included in rent or condominium fee

_____ No charge

d. Oil, coal, kerosene, wood, etc.

\$_____ Cost for the Past Year -- Dollars

OR

_____ Included in rent or condominium fee

_____ No charge or don't use any of these fuels

Answer question 7 ONLY IF you pay rent for THIS house, apartment or mobile home. ALL OTHERS skip to question 8a.

7. What is the monthly rent for this house, apartment or mobile home?

\$_____ Monthly Amount in Dollars

Answer questions 8a to 11 ONLY IF you or any member of this household OWNS or IS BUYING this house, apartment or mobile home. ALL OTHERS skip to question 14.

8a. Do you or any member of this household have a mortgage, deed of trust, contract to purchase, or similar debt on THIS property?

- YES, mortgage, deed of trust or similar debt
- YES, contract to purchase
- NO – Skip to question 9a

8b. How much is your regular monthly mortgage payment on THIS property? Include payment only on FIRST mortgage or contract to purchase.

\$_____ Monthly Amount – Dollars

OR

No regular payment required Skip to question 9a

8c. Does your regular monthly mortgage payment include payment for real estate taxes on THIS property?

- YES, taxes are included in the mortgage payment
- NO, taxes are paid separately
- NO, taxes are not required

8d. Does your regular monthly mortgage payment include payments for fire, hazard or flood insurance on THIS property?

- YES, insurance is included in the mortgage payment
- NO, insurance is paid separately
- NO, there is no insurance

9a. Do you or any member of this household have a second mortgage or a home equity loan on THIS property?

- YES, a home equity loan
- YES, a second mortgage
- YES, a second mortgage and a home equity loan
- NO – Skip to question 10

9b. How much is your regular monthly mortgage payment on all second or junior mortgages and all home equity loans on THIS property?

\$_____ Monthly Amount – Dollars

OR

No regular payment required

10. What were the real estate taxes on THIS property last year?

\$_____ Yearly Amount – Dollars

OR

___ None

11. What was the annual payment for fire, hazard, and flood insurance on THIS property last year?

\$_____ Annual Amount – Dollars

OR

___ None

12. Is this house, apartment or mobile home part of a condominium?

___ **YES** – *What is the monthly condominium fee?*

\$ _____ Monthly Condominium fee

OR

None

___ **NO**

Answer question 13 ONLY IF this is a mobile home.

13. What are the total annual costs for personal property taxes, site rent, registration fees and license fees on THIS mobile home and its site? Exclude real estate taxes.

\$_____ Annual Costs – Dollars

OR

___ None

ASK EVERYONE QUESTIONS 14, 15, 16 and 17.

14. What was THIS household's total income last year, before taxes, for each of the following? Please remember to include the income for ALL household members.

a. Wages, salary, commissions, bonuses, or tips from all jobs. Please report the amount before deductions for taxes, bonds, dues or other items. Please remember to include income for ALL household members.

\$_____ Total Amount for Last Year – Dollars

OR

___ None

- b. Self-employment income from own non-farm businesses or farm businesses, including proprietorships and partnerships.** Report NET income after business expenses. Please include income for ALL household members

\$ _____ Total Amount for Last Year– Dollars

OR

____ None

- c. Interest, dividends, net rental income, royalty income, or income from estates and trusts.** Report even small amounts credited to an account. Please include income for ALL household members.

\$ _____ Total Amount for Last Year – Dollars

OR

____ None

- d. Social Security or Railroad Retirement.** Please include income for ALL household members.

\$ _____ Total Amount for Last Year – Dollars

OR

____ None

- e. Supplemental Security Income, also known as SSI.** Please include income for ALL household members.

\$ _____ Total Amount for Last Year – Dollars

OR

____ None

- f. Any public assistance or welfare payments from the state, local or tribal welfare office.** Please include income for ALL household members.

\$ _____ Total Amount for Last Year – Dollars

OR

____ None

- g. Retirement, survivor or disability pensions.** DO NOT count Social Security. Please include income for ALL household members.

\$ _____ Total Amount for Last Year – Dollars

OR

____ None

- h. Any other sources of income received regularly such as Veterans' (VA) payments, unemployment compensation, child support or alimony.** DO NOT include lump sum payments such as money from an inheritance or the sale of a home. Please include income for ALL household members

\$ _____ Total Amount for Last Year – Dollars

OR

___ None

- i. Any per capita payments received by any household members.** Please include payments for ALL household members.

\$ _____ Total Amount for Last Year – Dollars

OR

___ None

15. What is the address of this residence?

ADDRESS

16. In what county is this residence located?

COUNTY NAME

17. Where is this residence located?

___ On reservation or trust land

___ Off reservation

ATTACHMENT B: U.S. Census Bureau Government Specialists for Tribal Programs

Atlanta Regional Office
101 Marietta St. NW, Ste. 3200
Atlanta, GA 30303-2700
Phone: (404) 730-3832 or 1-800-424-6974
FAX: (404) 730-3835
TDD: (404) 730-3963
E-mail: Atlanta.Regional.Office@census.gov
<https://www.census.gov/regions/atlanta/>

Chicago Regional Office
1111 W. 22nd Street, Suite 400
Oak Brook, IL 60523-1918
Phone: (630) 288-9200 or 1-800-865-6384
Fax: (630) 288-9288
TDD: (708) 562-1791
E-mail: Chicago.Regional.Office@census.gov
<https://www.census.gov/regions/chicago/>

Denver Regional Office
6950 W. Jefferson Ave., Ste. 250
Lakewood, CO 80235
Phone: (720) 962-3700 or 1-800-852-6159
FAX: (303) 969-6777
TDD: (303) 969-6767
E-mail: Denver.Regional.Office@census.gov
<https://www.census.gov/regions/denver/>

Los Angeles Regional Office
15350 Sherman Way, Suite 400
Van Nuys, CA 91406-4224
Phone: (818) 267-1700 or 1-800-992-3530
Fax: (818) 267-1711
TDD: (818) 904-6249
E-mail: Los.Angelos.Regional.Office@census.gov
https://www.census.gov/regions/los_angeles/

New York Regional Office
32 Old Slip, 9th Floor
New York, NY 10005
Phone: (212) 584-3400 or 1-800-991-2520
Fax: (212) 584-3402
TDD: (212) 478-4793
E-mail: New.York.Regional.Office@census.gov
https://www.census.gov/regions/new_york/

Philadelphia Regional Office
100 South Independence Mall West, Suite 410
Philadelphia, PA 19106-2320
Phone: (215) 717-1800 or 1-800-262-4236
FAX: (215) 717-2588
TDD: (215) 717-0894
E-mail: Philadelphia.Regional.Office@census.gov
<https://www.census.gov/regions/philadelphia/>

AIAN Data and Links:

[http://
factfinder.census.gov/home/aian/index.html](http://factfinder.census.gov/home/aian/index.html)

ATTACHMENT C: Formula Needs Worksheet for Census Challenge

Note: This worksheet is intended to be used with the survey in Attachment A. Please refer to the table on page 12 to determine which calculations the tribe/TDHE should complete.

In general, it is best to use a computer spreadsheet or data base program such as Excel[®] to analyze data. These worksheets are intended to help tribes understand the calculations that are necessary to go from the survey questions to the Needs data that must be submitted for the Census challenge. Small tribes or tribes without access to computer programs may choose to use these worksheets to do all of their data entry and analysis. Larger tribes and those with access to computer programs probably want to put their data into a spreadsheet or data base, but may find these worksheets helpful as guidelines for calculating the values for the Needs data.

For each of the Needs variables, the tribe/TDHE should provide totals for all the households located on reservation and trust lands by county, as well as subtotals for each balance of county. The balance of a county in IHBG terms refers to the land in a county that is not reservation or tribal trust land.

The tribe/TDHE should complete two separate sets of worksheets, one for households headed by a single-race AIAN, and one for households headed a by multi-race AIAN.

WORKSHEET 1: SUMMARY TABLE – PROPOSED NEEDS DATA BASED ON SURVEY COUNTS SUBMITTED BY TRIBE.

Note: Subtotals are required for reservation and trust lands by county. Separate subtotals are needed for each non-reservation portion of the tribe’s Formula Area, so long as totals for those areas are being challenged.

Needs Variable	Instructions	Total Count based on Survey Responses	Subtotal for Geography 1	Subtotal for Geography 2
AIAN persons	Survey Q2 – Sum “AIAN alone” and “AIAN in combination with other races” for each survey, and then total across all surveys			
AIAN households – less than 30% of formula median income	See Worksheet 3 and Worksheet 4			
AIAN households – between 30% and 50% of formula median income	See Worksheet 3 and Worksheet 4			
AIAN households – between 50% and 80% of formula median income	See Worksheet 3 and Worksheet 4			
AIAN households – substandard housing	See Worksheet 5			
AIAN households – severe housing cost burden	See Worksheet 6			

WORKSHEET 2: SUMMARY TABLE 2 – NEEDS VARIABLES PROPOSED BY TRIBE BASED ON EXTRAPOLATION OF SURVEY DATA.

Note: Extrapolated data will be considered only if the initial household listing is representative of all households in the geographic area being challenged, scientific sampling techniques are used, and a survey response rate of 70 percent or higher is achieved.

Needs Variable	Proposed Total Count based on Extrapolation of Survey Data	Subtotal for Geography 1	Subtotal for Geography 2
AIAN persons			
AIAN households – less than 30% of formula median income			
AIAN households – between 30% and 50% of formula median income			
AIAN households – between 50% and 80% of formula median income			
AIAN households – substandard housing			
AIAN households – severe housing cost burden			

Detailed Worksheets

WORKSHEET 3: Identify Formula Median Income categories. Determine thresholds that define the three categories of household need based on income. Complete for each county included in the Formula Area. Obtain data from <http://www.huduser.org/datasets/il.html>.

County Name	Household Size	Income threshold 1 30% of Formula Median Income	Income Threshold 2 50% of Formula Median Income	Income Threshold 3 80% of Formula Median Income
County 1	1 person			
County 1	2 persons			
County 1	3 persons			
County 1	4 persons			
County 1	5 persons			
County 1	6 persons			
County 1	7 persons			
County 1	8 or more			
County 2	1 person			
County 2	2 persons			
County 2	3 persons			
County 2	4 persons			
County 2	5 persons			
County 2	6 persons			
County 2	7 persons			
County 2	8 or more			
County 3, etc.				

WORKSHEET 4: Use to determine whether household is low-income. **INCLUDE ONLY IF AIAN-HEADED HOUSEHOLD (SURVEY QUESTION 3) IS "YES"**

HH	Formula Annual Income (Total HH income)	County	Total HH size	Income Needs Category
<i>Survey ID number</i>	<i>Sum of Survey Questions 14a – 14i</i>	<i>Survey Question 16</i>	<i>Survey Question 1</i>	<i>Code income using thresholds in Worksheet 3 for appropriate household size and county area, 1- below 30% 2- between 30% and 50% 3- between 50% and 80% 4- greater than 80%.</i>
1				
2				
3				
4				

WORKSHEET 5: Use to determine number of households in substandard housing. **INCLUDE ONLY IF AIAN-HEADED HOUSEHOLD (SURVEY QUESTION 3) IS "YES"**

HH	County	Total HH size	Number of Rooms	Persons per room	Complete Plumbing	Complete Kitchen	Counts towards substandard Housing?
<i>Survey ID No.</i>	<i>Survey Q16</i>	<i>Survey Q1</i>	<i>Survey Q4</i>	<i>Divide Q1 by Q4</i>	<i>Survey Q5a – 5d</i>	<i>Survey Q5e-5f</i>	<i>Code YES if Number of Persons Per Room is Greater than 1.01 OR Plumbing is "no" OR Kitchen is "no"</i>
1							
2							
3							
4							
5, etc.							

WORKSHEET 6: Use to determine number of AIAN households with severe housing cost burden.
INCLUDE ONLY IF AIAN-HEADED HOUSEHOLD (SURVEY QUESTION 3) IS "YES"

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)
HH	County	Formula Annual Income (Total HH income)	Annual Rent	Annual Mortgage/Mobile Home and Condo etc.	Real estate taxes if not included in mortgage	Insurance if not included in mortgage	Annual cost of utilities	Total Housing Cost	Housing Cost Burden	Counts as Severe Housing Cost Burden?
Survey ID number	Survey Question 16	Sum of Survey Questions 14a – 14i	(Q7 * 12) (blank if not a renter)	(Q8b * 12) + (Q9b * 12) + (Q12 * 12) + Q13 (blank if not an owner)	If Q8c is "NO" record Q10 here; otherwise leave blank	If Q8d is "NO" record Q11 here; otherwise leave blank	Q6a + Q6b + Q6c + Q6d	Calculated – Add Columns D, E, F, G, H	Calculated – Divide Column I by Column C	Code YES if Housing Cost Burden (Column J) is 5 or higher
1		\$	\$	\$	\$	\$	\$	\$	\$	
2		\$	\$	\$	\$	\$	\$	\$	\$	
3		\$	\$	\$	\$	\$	\$	\$	\$	
4		\$	\$	\$	\$	\$	\$	\$	\$	
5, etc.										

Please Note: The definition for AIAN Household for this special tabulation is a household where the head of household and/or spouse is AIAN. In addition, HUD uses the U.S. Census Bureau's definition of a household: a person or group of persons who live in a housing unit. This definition equals the count of occupied housing units used in the census.

RAW DATA

1. Total Number of Households in "Formula Area" (from list compiled for survey).
_____ Households listed
 2. Total Number of Households sampled for survey.
_____ Households sampled
 3. Total Number of Households responding to survey.
_____ Households responding
 4. Total persons in households responding to survey. The sum of survey question 1. (For example, if the sample was 2 households, with household #1 having 5 persons and household #2 having 4 persons, the sum of survey question 1 would result in a total of 9 persons).
_____ Persons
 5. Total Number of persons in households responding to survey who are AIAN either alone or in combination with other races. The sum of survey question 2.
_____ AIAN Persons
 6. The total number of AIAN households either alone or in combination with other races responding to the survey. The number of households responding "YES" to survey question 3.
_____ AIAN Households responding
-

CALCULATIONS

7. Response Rate = Line 3 divided by Line 2 (Line 3 / Line 2)
8. Weight of each responding household = Line 1 divided by Line 3 (Line 1 / Line 3)
9. Total AIAN American Persons = Line 5 times Line 8 (Line 5 X Line 8)
10. Total AIAN Households = Line 6 times Line 8 (Line 6 X Line 8)

Please Note: The definition for AIAN Household for this special tabulation is a household where the head of household and/or spouse is Native American. In addition, HUD uses the U.S. Census Bureau's definition of a household: a person or group of persons who live in a housing unit. This definition equals the count of occupied housing units used in the census.

RAW DATA

1. Total Number of Households in "Formula Area" (from list compiled for survey).
2. Total Number of Households sampled for survey.
3. Total Number of Households responding to survey.
4. Total persons in households responding to survey. The sum of survey question 1. (For example, if the sample was 2 households, with household #1 having 5 persons and household #2 having 4 persons, the sum of survey question 1 would result in a total of 9 persons).
5. Total Number of persons in households responding to survey who are AIAN either alone or in combination with other races. The sum of survey question 2.
6. The total number of AIAN households either alone or in combination with other races responding to the survey. The number of households responding "YES" to survey question 3.
7. Total number of AIAN households either alone or in combination with other races with incomes less than 30% of Median Income. The number of households responding "YES" to survey question 3 and whose population equals line 1 and income is below line 2:

TOTAL:		
--------	--	--

8. Total number of AIAN households either alone or in combination with other races with incomes less than 50% of Median Income. The number of households responding "YES" to survey question 3 and whose population equals line 1 and income is below line 2:

TOTAL:		
--------	--	--

9. Total number of AIAN households either alone or in combination with other races with incomes less than 80% of Median Income. The number of households responding "YES" to survey question 3 and whose population equals line 1 and income is below line 2:

80% of Local Area Median Income (From table supplied by HUD)	Persons in household (response to survey question 1)	Total Number of AIAN Households either alone or in combination with other races with income below 30% of Local Area Median (question 10 of survey)
TOTAL:		

10. Total Number of AIAN Households either alone or in combination with other races Overcrowded and or without complete kitchen or plumbing are all of those AIAN households that meet one or more of the following requirements:

- a) It is overcrowded (Question 1 /Question 4 is 1.01 or greater).
- b) It is without complete plumbing (responded NO to Question 5a, 5b, 5c or 5d).
- c) It is without complete kitchen (responded NO to Question 5e or 5f).

11. Total Number of AIAN households either alone or in combination with other races with severe housing cost burden are all those AIAN households who meet the following requirements:

For AIAN renters: $((Q7 * 12 \text{ months}) + (Q6a + Q6b + Q6c + Q6d)) / (Q14a + Q14b + Q14c + Q14d + Q14e + Q14f + Q14g + Q14h + Q14i)$ -- result is greater than 50%.

For AIAN owners: $((Q8b * 12 \text{ months}) + (\text{IF } Q8c \text{ is NO, } Q10) + (\text{IF } Q8d \text{ is NO, } Q11) + (Q9b * 12 \text{ months}) + (\text{IF } Q12 \text{ is YES, } Q12 * 12 \text{ months}) + (Q13) + (Q6a + Q6b + Q6c + Q6d)) / (Q14a + Q14b + Q14c + Q14d + Q14e + Q14f + Q14g + Q14h + Q14i)$ -- result is greater than 50%.

Internal HUD Distribution:						
PN Reading File		PNPG Reading File		PNPG Formula		
Jackie Kruszek						
Identification Lines:						
PNPG:KRUSZEK:RWH: 06-01 -17, 303-675-1600, J:NONAP\GRANTS MANAGEMENT\CORRECTIONS\FY 2017 FINAL\FY 2017 CENSUS GUIDELINES 4119						
Correspondence Code	Originator PNPG	Concurrence PNPG	Concurrence PNPG	Concurrence	Concurrence	Concurrence
Name	HAYNES	KRUSZEK	GRIEFER			
Initials	RWH	JAK	FJG			
Date	5/9/17	5/11/17	5/11/17			

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