

## **Challenging Census Population Projections Data: Guidelines for the Indian Housing Block Grant Formula**

This document, in question and answer format, outlines the steps HUD requires for a tribe to challenge the Bureau of the Census Population Projections data used in calculating the Needs component of the Indian Housing Block Grant (IHBG) formula to project 2010 Census person counts or tribal survey data to the present.

### **Q1: How is the Needs component of the IHBG formula affected by the Census Bureau Population Projections?**

**A1:** In accordance with 24 CFR 1000.330(b), the data for one Needs variable, the American Indian and Alaska Native (AIAN) person count, are adjusted annually. AIAN person counts used in the Formula are derived from the most recent Decennial Census unless a HUD has approved a Census challenge to that data submitted by the Tribe. These data are adjusted to reflect demographic shifts which have occurred at the county level since the Decennial Census using population projections prepared by the Census Bureau annually. If the person counts are based on data submitted by the Tribe, they will be adjusted from the year of first use in the Formula to the most recent year reflected in the Census Population Projections.

### **Q2: Can tribes or tribally designated housing entities (TDHE) challenge Population Projections?**

**A2:** Yes. In accordance with §1000.330(c) and §1000.336, a tribe/TDHE may challenge Census Population projections data. A challenge may be submitted to the IHBG Formula Customer Service Center if Tribes/TDHEs believe the adjustment to their Census data is incorrect. HUD will approve the challenge only if HUD has incorrectly used the Census Population Projections to adjust the needs data for the Tribe's Formula Area. If the problem is with the underlying Census Data, then a challenge must be directed to the Census Bureau and conform to regulations governing them, found at 15 CFR Part 90. All challenges must utilize the estimation methodology used by the Census for a particular level of geography. Challenges are accepted by the Census Bureau only when evidence is provided regarding errors in data or calculation.

### **Q3: What is the procedure for challenging Census Population Projections?**

**A3:** To challenge HUD's application of Census Population Projections data to the Tribe's Formula Area, submit a letter following the same procedures for correcting other data on the Formula Response Form. To challenge the underlying Census Populations Projections data, follow Census Bureau procedures, which may be found at <https://www.census.gov/programs-surveys/popest/about/challenge-program.html>. Inform the IHBG Formula Customer Service Center of challenges you submit to Census.

All data and approval documentation should be sent to:

IHBG Formula Customer Service Center  
1875 Connecticut Ave., NW, 10<sup>th</sup> Floor  
Washington, D.C. 20009  
Toll Free: 800-410-8808  
Fax: 202-393-6411  
E-mail: [IHBGformula@firstpic.org](mailto:IHBGformula@firstpic.org)