

## **HUD 4119 Appendix D: Challenging Total Resident Service Area Indian Population Data: Guidelines for the Indian Housing Block Grant Formula**

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This document describes the data and documentation required by HUD for a Tribe to challenge the Total Resident Service Area Indian Population (TRSAIP) data used in the Needs component of the Indian Housing Block Grant (IHBG) formula.

### **Q1. What variables in the Need Component are affected by TRSAIP data?**

**A1.** Since FY 1998, HUD has used the most recent Bureau of Indian Affairs (BIA) TRSAIP data to proportionally divide the U.S. Decennial Census population data for Tribes with overlapping Formula Areas, unless the Tribes agree on a different allocation method.

### **Q2. What are TRSAIP data?**

**A2.** TRSAIP data is defined in the BIA Labor Force Report as the Tribe's estimate of all American Indian and Alaska Native (AIAN) members and non-members living on or near the Tribe's reservation and who are eligible to use the BIA funded services. It further states that a Tribe's total service population lives within a reasonable distance of the reservation from where they can access the Tribe's services and typically do not live in distant cities, towns, or foreign countries.

### **Q3. Who collects TRSAIP data?**

**A3.** The BIA originally collected and published TRSAIP data annually in the Labor Force Report. This responsibility has since shifted to the Department of Labor, which is working on resuming data collection and publication, including TRSAIP figures.

### **Q4. How can I update TRSAIP data?**

**A4.** Although BIA no longer manages the Labor Force Report, some offices continue to update TRSAIP figures upon request. Requests must be submitted to the Tribe's local BIA office, which may process them according to existing procedures.

**Q5. How do I change my IHBG formula data once my TRSAIP update is approved by the BIA?**

**A5:** Once your update is approved by BIA, obtain a BIA certification with the updated TRSAIP number. To ensure the updated data is considered for the next fiscal year's IHBG Formula allocation, submit all approved documentation in writing to the IHBG Formula Customer Service Center by August 1.

**Q6: What if BIA cannot update my TRSAIP data?**

**A6:** For Tribes in overlapping Formula Areas, the Needs data for all areas are combined and then divided among the Tribes. Under 24 CFR 1000.326, Tribes can agree on how to share the data. If no agreement is reached, HUD uses TRSAIP data to allocate needs. HUD recognizes that in some cases, TRSAIP data may be outdated and BIA may not be able to update it for a Tribe on a case-by-case basis. HUD also recognizes that there may be times where TRSAIP data is simply too outdated to equitably distribute Needs data between two Indian Tribes in overlapping Formula Areas. In such cases, in accordance with 24 CFR 1000.326, HUD reserves the right to make a decision on what data will be used to divide the funds between Indian Tribes in overlapping Formula Areas. HUD may choose an alternative data source to divide such funds between the Tribes with the overlapping Formula Areas, as it deems appropriate.

HUD will make the decision on what data will be used to divide the funds between the Indian Tribes by August 1.

All data and approval documentation should be sent to:  
IHBG Formula Customer Service Center 101 Ridgely Ave, Suite 10  
Annapolis, MD 21401  
Toll Free: 800-410-8808  
Fax: 202-393-6411  
E-mail: [IHBGformula@firstpic.org](mailto:IHBGformula@firstpic.org)