



STATE OF WASHINGTON
DEPARTMENT OF COMMERCE

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www.commerce.wa.gov

April 21, 2022

Dear Governor Inslee and Washington State Legislators,

Enclosed is the Native American housing section of the consultant reports fulfilling the proviso from the [2020 capital budget](#):

\$200,000 of the appropriation in this section is provided solely for the department to contract for a study regarding both available and needed affordable housing for farmworkers and Native Americans in Washington state. The study must include data to inform policies related to affordable housing for farmworkers and Native Americans and supplement the housing assessment conducted by the affordable housing advisory board created in chapter 43.185B RCW.

As directed by state statute, Commerce contracted with Big Water Consulting, supported by the Urban Institute and Akana, for the report on housing needs for Native Americans. Commerce contracted with Berk Consulting for the report on farmworkers housing needs.

Due to pandemic staffing issues and stakeholder engagement challenges, these reports were delayed for final review and approval by the agency and governor's office. This delay should not create negative perceptions about the important and timely work conducted by the consultants to engage and review the needs of these populations.

Despite the delay in publication, both consultants shared findings and summaries with the state Legislature and at the 2021 Housing Washington Conference.

The agency reviewed the recommendations produced by the consultants and stakeholders, and will consider these recommendations in future housing discussion and proposals.

Signed,

A handwritten signature in blue ink, appearing to read "Diane Klontz".

Diane Klontz
Assistant Director
Community Services and Housing Division
Department of Commerce

Assessment of the housing needs of American Indians, Alaska Natives and Native Hawaiians in Washington



Pursuant to Sec. 1011(9) of the [2020 capital budget](#) (Chapter 356, Laws of 2020)

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PLANNING-RELATED CONTRIBUTIONS FROM
MEGAN KNOX AND LONNY MACY OF AKANA

**COMMUNITY SERVICES AND
HOUSING DIVISION**

March 24, 2022

Report to the Legislature

Director Lisa Brown

Acknowledgments

We would like to acknowledge the efforts of the project stakeholders, members of the advisory group and all who participated in focus groups and interviews (see [Appendix C](#) for a list of interviewees). We would also like to acknowledge the Native organizations who advocated for commissioning this project and the Washington Department of Commerce for funding and administering this study.

Invited stakeholders

Chehalis Housing Authority*
Colville Indian Housing Authority
Cowlitz Indian Tribal Housing
Hoh Indian Tribe*
Jamestown S’Klallam Tribe
Kalispel Tribe of Indians Housing Office
Lower Elwha Housing Authority
Lummi Housing Authority
Makah Tribal Housing Department*
Muckleshoot Housing Authority
Nez Perce Tribal Housing Authority
Nisqually Indian Tribal Housing
Nooksack Indian Housing Authority
Port Gamble S’Klallam Housing Authority
Puyallup Nation Housing Authority
Quileute Housing Authority
Quinalt Housing Authority
Samish Indian Nation Housing Department
Sauk-Suiattle Indian Tribe Housing Department
Shoalwater Bay Indian Tribe
Skokomish Tribe
Snoqualmie Tribe
Spokane Indian Housing Authority
Squaxin Island Tribe
Stillaguamish Tribe
Suquamish Tribe
Swinomish Housing Authority
Tulalip Housing Department
Upper Skagit Indian Tribe*
Yakama Nation Housing Authority
Chief Seattle Club
Seattle Indian Health Board
United Indians of All Tribes Foundation
Mother Nation
Catholic Community Services
Moku`aina A Wakinekona Hawaiian Civic Club

*indicates invited stakeholder who declined or did not respond

Advisory group

1st Tribal Lending
Affiliated Tribes of Northwest Indians

Beacon Development
Beaux Simone Consulting
Cielo Gibson, Tribal Housing Consultant
Coalition to End Urban Indigenous Homelessness
Enterprise Community Partners
Hawaii Radio Connection/Wing Luke Museum
Housing Data Systems (HDS)
Hobbs, Straus, Dean & Walker, LLP
HUD Northwest Office of Native American Programs (NwONAP)
King County Housing Authority
MASS Design/Sustainable Native Communities
Native American Youth and Family Center (NAYA)
Native Community Capital
Northwest Indian Housing Association
Opportunity Council
RTHawk Housing Alliance, LLC
Seattle Indian Services Commission
Seven Sisters Community Development Group
Tacoma Rescue Mission
Tlingit-Haida Regional Housing Authority/HYFC
Travois
USDA Rural Development
Washington State Housing Finance Commission
Washington State Department of Commerce
Washington State Housing Trust Fund

Washington State Department of Commerce

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For people with disabilities, this report is available on request in other formats. To submit a request, please call 360-725-4000 (TTY 360-586-0772)

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Executive summary

The unique histories, cultures and circumstances of Native peoples and the specific issues that have led to poor housing conditions, housing shortages and stunted housing markets within Native communities and Tribal lands are often overlooked, ignored, or subsumed within broader regional and national housing studies and data collection efforts. The data collection and research conducted in this statewide study, the Assessment of the Housing Needs of American Indians, Alaska Natives, and Native Hawaiians in Washington, addresses those information gaps. This study sought to: Identify the range of socioeconomic environments and geographies in which Native housing providers are operating; describe and quantify housing need within each of the Native communities and regions of the state; summarize the barriers preventing Native housing providers from addressing or reducing that need; and provide concrete opportunities or solutions shared by project stakeholders as well as a set of additional actions to consider that could reduce or eliminate several of these identified barriers.

The state of Washington completed a statewide housing needs assessment in 2015.¹ However, that needs assessment did not specifically evaluate or summarize the housing needs of Washington's many diverse Native communities or its population of farmworkers. Following sustained advocacy by Native organizations, the needs assessment summarized in this report was commissioned by the Washington Department of Commerce Community Services and Housing Division through a request for proposal (RFP) using proviso funding to address Native housing needs in Washington, while a separate report was commissioned to address farmworker housing needs. This needs assessment builds on prior Native housing needs assessments, such as the Seattle Indian Services Commission's assessment focusing on the housing needs of American Indian and Alaska Natives within King County and the HUD-funded national Native housing needs assessment conducted by the Urban Institute. However, this is the first-ever Native housing needs assessment focusing specifically on the Native communities within Washington.

Each Native community in Washington covered in this report – Washington Tribal members living within Tribal lands and reservations, urban Natives, Alaska Natives, and Native Hawaiians – has their own perspectives, traumas, achievements, and goals that influence the way they operate, their relationships with government agencies, the severity and types of housing need in their communities, and their capacity to address these needs. The housing circumstances of the members of Tribes in Washington are in part determined by the reservations the government placed them on years ago through a series of treaties in the 1850s.² Many Tribes did not sign treaties or were not given land for reservations, impeding federal recognition and subsequent access to Tribal funding and resources. Hasty relocation of Tribal members from Tribal lands to Seattle in the 1950s due to the Indian Relocation Act of 1956³ caused tremendous intergenerational trauma that, in combination with a lack of culturally sensitive shelters and temporary housing options, contributes to high levels of chronic homelessness among urban Native people today.⁴ Similarly, the boarding school era – which lasted from the mid-1800s until the late 1970s – separated Native children from their families and sent them to boarding schools meant to assimilate children, causing generations of trauma and relocation away from Tribal lands.⁵ Many Alaska Natives were transplanted in Washington through these forced relocations, mandated boarding schools, or traumatic adoption practices, while Native Hawaiian transplants were more likely to relocate due to a lack of employment, housing or other opportunities on the islands. Both of these

¹ Mullin & Lonergan Associates, 2015

² Washington State Historical Society, n.d.

³ Allen, n.d.

⁴ Seattle Indian Services Commission, 2019

⁵ Marr, n.d.

communities were absorbed primarily into urban Native communities or other communities of color, though some joined Tribal communities, often through marriage.

The era of Native self-determination⁶ that began in the late 1960s redefined the way Tribes and urban Native communities access, manage, and distribute resources and the nature of their relationships with federal, state, and local governments. Indian Tribes in Washington and throughout the country are now operating within an era of both self-determination and self-governance, in which they can begin to fully claim and exercise their treaty rights, expand their authority to manage their programs and resources, grow and diversify Tribal enterprise, and develop genuine government-to-government relationships. Urban Native organizations, many of which began in the early 1970s due to activist efforts and the emerging self-determination era for Native peoples,⁷ have also expanded their relationships with city, county and state agencies and philanthropic entities, enabling them to participate in program planning processes and to, for example, receive funds from the City of Seattle to develop affordable housing and provide rental assistance to low-income Native families.⁸

The Assessment of the Housing Needs of American Indians, Alaska Natives, and Native Hawaiians (or Washington Native Housing Needs Study for short) was launched in early 2020 and was announced at various in-person regional events focused on Native housing. Invitations to participate as a stakeholder in the study were sent to representatives from every Tribal housing entity and department in Washington and various urban Native organizations and members of the Native Hawaiian and Alaska Native communities. This core stakeholder group selected Native housing consultants, lawyers, and other knowledgeable sources to participate in the study as members of an advisory group. Shortly after the launch of this needs assessment, the COVID-19 pandemic began, and the study's information-gathering methods were adjusted to accommodate virtual meetings in place of any planned in-person gatherings or announcements. A monthly call involving the entire group was held via Zoom to keep stakeholders and advisory group members informed regarding project progress and foster group discussion regarding key housing issues.

Due to the wide range of experiences, legal frameworks, and organizational capacities of the various Tribes, Native organizations, and supportive entities involved, it was not feasible to capture data using a single survey. Instead, the following three surveys were developed in cooperation with the stakeholders and advisory group members: A survey for Native housing providers, both Tribal and urban; a survey for the advisory group members; and a survey for Alaska Natives, Native Hawaiians, and non-federally recognized Tribes. Response rates were lower than anticipated for all three surveys (see below for numbers), highlighting the difficulty in compiling a dataset encompassing entities with so much institutional diversity and the added administrative and emotional burdens to Native communities brought about by the COVID-19 pandemic.

Qualitative and quantitative data collection

To assess housing needs, study coordinators used a combination of primary data collection and existing data analysis. Primary data was collected through surveys, focus groups, and key informant interviews. Study coordinators analyzed existing data from the American Community Survey (ACS); Point-in-Time (PIT) Counts of homelessness; publicly available data on grant and funding recipients from federal, state, and local sources; planning documents at the county, city, and Tribal level; annual Tribal housing planning documents and

⁶ The period after the 1960s is known as the era of self-determination due to a combination of policy allowing tribal government more opportunity to manage local issues and advocacy efforts in the late 1960s and early 1970s. (Champagne, 1997)

⁷ Allen, n.d.

⁸ Brownstone, 2020

performance reports received through a Freedom of Information Act (FOIA) request to HUD's Office of Native American Programs; and other publicly available data assessing economic conditions and housing markets.

Due to the diversity of Native housing circumstances and geographies, the findings are segmented by the specific population or community served (e.g., Tribal housing providers, urban Native housing providers, and Native Hawaiian and Alaska Native communities), and Tribal housing providers were further segmented by region or geography (e.g., Coastal/Peninsula, Eastern Washington/Columbia River, and Puget Sound/I-5 Corridor).

- Of the 29 federally recognized Tribes in Washington, 18 Tribal housing entities provided at least partial responses to the survey (62% of Tribes gave at least partial response). Of the 18 respondents, 12 provided complete responses (41% of Tribes completed the survey). An abbreviated survey containing only vital data questions was submitted to non-responding entities and captured an additional six responses. A total of 22 federally recognized Tribes in Washington participated in the housing provider survey (76% of Tribes provided vital data).
- Of the 18 advisory group members, 10 of the members provided full responses, and two provided partial responses.
- Two complete responses were received for the Alaska Native/Native Hawaiian/non-federally recognized Tribes Survey, with one additional partial response.
- Fifteen key informant interviews were completed.
- Seven focus groups conducted with 37 attendees.

Collected data indicate that in Washington, American Indian/Alaska Native (AIAN) and Native Hawaiian and Pacific Islanders tend to experience higher rates of overcrowding in homes, are more likely to be cost-burdened (or pay more than 30% of their income on housing expenses), have lower rates of homeownership, are more likely to live in housing with moderate-to-severe structural problems, experience higher rates of unemployment, earn lower household incomes, and experience disproportionately higher rates of homelessness in comparison to statewide averages.

Recent American Community Survey Public Use Microdata Samples (PUMS) indicate that in Washington, an estimated 3,407 (4.9%) AIAN-headed households were overcrowded, of which 1,146 (1.6%) were severely overcrowded. 2,290 (9.8%) Native Hawaiian and Pacific Islander-headed (NHPI) households were overcrowded, of which 676 (2.9%) were severely overcrowded.⁹ Further, 27,051 (36.7%) AIAN-headed households were estimated to be cost-burdened, of which 12,732 (17.3% of AIAN-headed households) were severely cost-burdened (or pay more than 50% of their income on housing expenses), and 8,773 (37.4%) NHPI households were cost-burdened, of which 3,145 were severely cost-burdened (13.4%).¹⁰ In total, 29,279 (39.8%) AIAN-headed households in Washington were either overcrowded or cost-burdened, and 10,260 (43.8%) NHPI-headed households were either overcrowded or cost-burdened while, statewide, 30.0% of Washington households were either overcrowded or cost-burdened. Additionally, AIANs make up less than 3.1% of Washington's population but make up 11.1% of the state's population experiencing homelessness and 18.1% of unsheltered homeless according to 2020 Point-in-Time counts; Native Hawaiian and Pacific Islanders make up approximately 2.9% of the state's homeless population but account for less than 1.3% of Washington's overall population.

⁹ ACS 2018 5-Year PUMS Estimates

¹⁰ Ibid.

Needs, barriers and opportunities

Tribal housing providers

The primary housing need recognized by Tribally designated housing entities (TDHEs) in Washington is, most simply, for more and better housing. Tribes and Tribal housing entities need to expand their ability to build new housing units, maintain existing units, and help their members transition into homeownership. Tribal communities suffer from a shortage of quality housing caused by the inability of housing entities to fund, develop, or maintain housing. Some of the many barriers to developing new Tribal housing were identified in this study, including:

- Indian Housing Block Grant (IHBG) funding, the primary funding mechanism for Tribal housing, has stagnated since the beginning of the program in 1996, and the annual allocation has not increased to account for inflation, seriously impeding the buying power of this money; rising costs of building materials and labor, outpacing inflation, mean that new housing development is even further out of reach for most Tribes.
- IHBG funding often does not fully cover the cost of regular maintenance and operations of existing managed units.
- Infrastructure and labor costs do not scale well for small and/or rural Tribes, further impeding their ability to develop new housing.
- Tribes in rural or hard-to-access Olympic Peninsula areas have difficulties finding contractors and other skilled labor due to their remote locations and a lack of available workforce housing.
- Within housing entities, staff turnover reduces the vital institutional and historical knowledge necessary for long-term projects to be successful and sustainable.
- Tribal housing authority rents are typically too low to serve as a sufficient source of revenue to cover operational costs or support new housing development, due in part to the low income of residents and in part to local political pressure to keep rents low; the average rent collected by surveyed TDHEs, who can only charge at maximum a standardized 30% of household income, was \$430 for a 1-bedroom unit and \$635 for a 3-bedroom unit.
- Cities and counties do not include Tribes in planning processes, despite the presence of Tribal members or the city/county in Tribal service areas.
- Complications created by the presence of trust lands on reservations and the inability or refusal of traditional lenders to adapt their lending practices to work within the Tribal lands create additional administrative and bureaucratic barriers to the development of new Tribal housing as well as homeownership for Tribal members.

Despite the many barriers to housing development, Tribes and TDHEs implement a wide range of housing programs, serving thousands of households per year using existing funding mechanisms. Survey data showed that many Tribes and TDHEs would like to prioritize culturally responsive planning and design and energy efficiency. Tribes have come up with creative ways to bring new housing development to their communities, including creating their own force account construction teams¹¹ to build housing instead of relying on outside contractors. For coastal Tribes, there are opportunities for collaboration, including packaging multiple

¹¹ In force account work, an IHBG recipient acts as the general contractor and assumes the risks of executing the following tasks: engaging architectural and engineering services, retaining subcontractors, financing the project, coordinating the contractors, and inspecting the work. See: https://www.hud.gov/sites/documents/DOC_8747.PDF

construction projects into a single request for proposal (RFP) to bring contractors enough work to make the remote travel worthwhile.

Urban Native housing providers

Housing providers for urban Native residents identified a range of needs and barriers for housing in the surveys conducted in this study. The primary housing need recognized by urban Native housing providers in Washington is more emergency, transitional, and long-term or permanent housing. The primary barriers to meeting this need are a lack of consistent and reliable funding and restrictions on the use of funds that impede the creation of culturally relevant facilities, spaces and services. These needs and barriers have been made even more acute by the impacts of the COVID-19 pandemic, which has disproportionately affected AIAN individuals in both infection and mortality rates.¹² The community served by urban Native housing providers suffers from intergenerational trauma and associated mental health issues, and isolation from family and community. Individuals and households tend to be relatively low-income in cities with rapidly increasing housing costs. Urban Native organizations acknowledged that addressing homelessness and housing instability through culturally sensitive emergency and transitional housing with wraparound services while also developing long-term and permanently affordable housing options is critical for the health and well-being of the urban Native community in Washington. A disproportionate number of Native individuals in King County (which includes Seattle, Washington's largest urban center), for example, are experiencing homelessness. Pre-COVID-19 Point-in-Time Counts of homeless persons found that AIAN make up 15% of the homeless population in King County, but just 1% of the population of King County overall (All Home King County, 2020). Native Hawaiian and Pacific Islanders make up 4% of the homeless population but 1% of the county's overall population. This reflects the statewide trend, but incomplete data from several counties may understate the full extent of the problem.

Funding urban housing development also requires complex leveraging and long-term planning, as well as outside investors, developers, and contractors who frequently do not understand the needs of Native communities. Even if urban Native housing providers are able to attract the requisite funding or financing to either develop or purchase housing units, they are unable to prioritize serving Native people when determining who will occupy their units (King, 2019). This impedes their ability to serve their people with the funding they are able to secure and to create culturally responsive communities known to be effective in reducing chronic homelessness. A local example of the success of this community approach is Chief Seattle Club's Eagle Village, which has a homelessness relapse rate of 3% compared to the county-level relapse rate of 12%, according to a Chief Seattle Club staff member. Most urban Native service providers are located in or near downtown areas, but many of the people they serve have been displaced to the fringes of the city and county by rising housing and other costs.

Alaska Native communities

The greatest need recognized by members of the Alaska Native community in Washington is for access to services, including mental health care, financial education, and especially resources specific to Native people. Members of Alaska Native Tribes and villages living in Washington have a difficult time accessing resources and services while living outside of Alaska. While some Tribes, like the Central Council of the Tlingit and Haida Indian Tribes of Alaska, have enough members living in Washington to justify plans to open a local Tribal office that may eventually serve locally-based Tribal members, many Alaska Natives must use publicly available housing services. Alaska Native corporations, while generally able to provide financial assistance to support

¹² Arrazola, et al., 2020

services related to health care and education, are often constrained in their efforts to provide housing assistance by their own internal requirements, which state that all aid must be provided equally and be equally accessible to all shareholders, according to interviews. Urban Native organizations, especially Chief Seattle Club, serve a high proportion (1 in 5 clients) of Alaska Native individuals and are aiming to make their services accessible to all people who self-identify as Indigenous, according to a Chief Seattle Club staff member.

Native Hawaiian communities

The needs most commonly cited by members of the Native Hawaiian community in Washington are access to health care and affordable housing options. Analysis of existing data shows that this community appears to be struggling to afford skyrocketing housing prices in urban areas, pushing these communities to the fringes of metropolitan areas and disrupting access to and formation of centralized communities. Native Hawaiian communities in Washington do not have the same status as sovereign nations as do federally-recognized Indian Tribes, and, as a result, Native Hawaiian organizations in Washington have much greater difficulty attracting funding and providing vital services and resources to their community members. Native Hawaiian individuals and households often rely on publicly available services, but as noted above, urban Native service providers are broadening their mission statements and scopes of services to absorb and embrace this community, to the extent feasible within applicable funding requirements.

Recommendations

Many of the housing needs identified within Native communities in Washington and barriers to addressing or reducing those needs have been present for generations. Colonization and deeply embedded institutionalized racism disrupted traditional processes of housing Native people and created a dependency on underfunded programs focused on assimilation to non-Native society.¹³ There is no easy fix for the housing needs of Washington's Native communities, and lasting and meaningful change requires systemic changes at all levels of government. The recommendations provided in this report should not be viewed as exhaustive or prescriptive. The summarized recommendations were provided by stakeholders and selected by study coordinators to provide a holistic list of actions to consider while recognizing the complexities of Native housing and its intersections with Tribal governance, local, state and federal government, and private and non-profit industries. Suggestions that pertain to specific funding mechanisms, programs, or agencies are provided in the body of the report as "Additional actions to consider" and are offered for the purpose of stimulating and advancing the discussion of these critical issues.

Tribal housing providers:

- **Data describing and quantifying need.** Implement better data collection concerning AIAN populations and their housing needs at all levels, but especially data necessary for understanding homelessness and housing markets.
- **Using data to develop housing plans.** Undertake strategic planning in the form of comprehensive plans and zoning ordinances to facilitate coordination across multiple organizations for longer-term or larger projects. This will also allow for greater collaboration between Tribes and local cities or counties. Funding mechanisms are needed for these efforts.
- **Capacity.** Expand efforts to reduce the amount and impacts of staff turnover, including cross training support staff and sharing information across departments and entities. For smaller entities, partnerships and collective planning or purchasing.

¹³ Pindus, et al., 2017

- **Financing.** Increase access to vital funding sources, including Low-Income Housing Tax Credits and mortgage lending opportunities through local lending institutions or Community Development Financial Institutions (CDFIs).
- **Grants.** Address the steady, inflation-related decline of annual block grant funding and evaluate competitive grant application processes to determine if grants intended to address need are effectively balancing high need with administrative capacity for the grant-writing process, as well as assessing if the administrative burden of the grant is excessive in relation to the amount awarded.
- **Lending.** Investigate ways to reduce barriers to lending on trust land; for example, determine if avoiding mortgage lending on trust land due to requirements of the secondary mortgage market violates anti-discrimination laws, as well as programs aimed at reducing foreclosure and increasing homeowner education and support.
- **Planning processes.** Include Tribes and Native communities in planning processes of neighboring or overlapping jurisdictions. Strengthen efforts by local, state, or federal entities to specifically and consistently invite Tribes to be a part of these processes and/or consider methods of mandating or incentivizing this inclusion.
- **Housing development.** Determine methods for creating affordable, cost-effective units and maximizing available land, such as tiny homes, multi-family structures, in-fill development, and culturally relevant higher-density housing designs.
- **Collaboration.** Develop sustained collaboration between agency staff and housing providers, as well as between housing providers through coalitions, adding Tribal representation to existing working groups, or creating new working groups. Use this collaboration to determine if changes to programs are necessary or better integration of programs is achievable.

Urban Native housing providers:

- **Data.** Continue advances already proposed or implemented by urban Native providers to create new avenues for data collection concerning users of emergency housing and other services and investigate ways to better collect housing and housing market data for Native populations.
- **Housing Plans.** Create more inclusivity for Native people and representatives of Native organizations in local, regional, and state-level planning efforts for housing and other services.
- **Funding.** Address eligibility of urban Native organizations in accessing certain funding mechanisms and address other gaps in funding due to urban Native providers not being able to access Tribal housing funding or practice Native preference.
- **Financing and Lending.** Expand financial literacy and housing development capacity and strengthen the financial position of urban Native organizations so they can become more competitive in the housing financing market.
- **Collaboration.** Organize regular meetings with a coalition of knowledgeable representatives of Tribes, funding sources, and governments to create avenues for collective action.

Alaska Native communities:

- **Planning.** Develop an umbrella Alaska Native organization in Washington that can help to quantify and demonstrate the housing needs of Alaska Natives living outside of Alaska.
- **Capacity.** As part of their ongoing efforts to expand their services in Washington, the Tlingit and Haida Tribes of Alaska could reach out to other Alaska Native Tribes/villages in Alaska to invite them to convene their members living in Washington to discuss the needs of the broader Alaska Native community.
- **Collaboration.** Similarly situated communities, such as the non-federally recognized Tribes and Native Hawaiian and Alaska Native communities, could collaborate to develop opportunities to provide mutually beneficial services using facilities and guidance provided by existing urban Native and Tribal organizations.

- **Housing Development.** Examine which funding sources are able and willing to provide housing or housing assistance funding for Alaska Native communities in Washington, including which services can be funded by Alaska Native Corporations or Alaska-based Native CDFIs.
- **Homeownership.** Educate and prepare homebuyers and improve access to financial institutions at large inter-Tribal events and use preexisting Native CDFIs.

Native Hawaiian communities:

- **Planning.** Consider collecting data concerning Native Hawaiian needs at community gatherings and utilize the collected information to engage elected officials, relevant government agencies and service providers to ensure community members' needs are addressed.
- **Capacity.** Tap into civic clubs and other cultural organizations to expand the range of services or work in conjunction with existing Native Hawaiian organizations.
- **Funding.** Utilize online vendor portals and connections with existing nonprofit organizations serving the Native Hawaiian community to help raise funds to address the needs of Native Hawaiian communities in Washington.
- **Homeownership.** Consider community listings for rentals, unit sharing, and even home sales.

Conclusion

American Indians, Alaska Natives, and Native Hawaiians in Washington expend disproportionately high percentages of their income on housing, are more likely to live in substandard housing, and are more likely to experience homelessness in comparison to the average household in Washington. Historic discrimination and a lack of funding leave these communities living under measurably worse conditions than non-AIAN and non-Native Hawaiian residents and households. Many actionable opportunities that could reverse these trends and change the status quo are available at every level of government.

Introduction

The purpose of this report is to identify and provide recommendations to address the housing needs of American Indians, Alaska Natives, and Native Hawaiians living in Washington, which fills a data gap left by a statewide housing needs assessment conducted in 2015. This report describes the housing needs of these populations and the various barriers to filling those needs, as well as provides recommendations for how to alleviate the stated needs and barriers to providing safe and sanitary housing for Native people within the state of Washington. The primary outcome of this project is this report, which contains a narrative summary and associated data relating to the overarching themes of Native housing in Washington. The report outlines study methods, outcomes, and a holistic set of recommendations for addressing the stated needs and barriers. The project and its components are grounded in and informed by Native history, previously conducted studies and research, and current issues being addressed by Tribes and other Native communities.

Background

This report was produced to satisfy the portion of the requirements of Section 1011 (9) of the [2020 capital budget](#) (Chapter 356, Laws of 2020) related to Native Americans in Washington:

“\$200,000 of the appropriation in this section is provided solely for the department to contract for a study regarding both available and needed affordable housing for farmworkers and Native Americans in Washington state. The study must include data to inform policies related to affordable housing for farmworkers and Native Americans and supplement the housing assessment conducted by the affordable housing advisory board created in chapter 43.185B RCW.”

A separate farmworker housing needs assessment was produced to satisfy the other portion of the proviso. Both reports were published simultaneously in April, 2022.

This project is the first statewide housing needs assessment that specifically focuses on American Indian, Alaska Native, and Native Hawaiian communities in Washington. Other local and national studies have been conducted on this subject, such as the 2017 HUD "Assessment of American Indian, Alaska Native, and Native Hawaiian Housing Needs" conducted at the national level by the Urban Institute.¹⁴ While illustrative of Native housing needs and programs at the national level, this study did not capture the unique aspects of Native housing in Washington or the specific services and funding available to address needs within the state.

More localized housing needs assessments have also been conducted. For example, the recent Seattle Indian Service Commission's King County American Indian and Alaska Native Housing Needs Assessment, which did not include Native Hawaiians or the vast majority of reservations and Tribal communities in Washington, was completed in 2019 (Seattle Indian Services Commission, 2019). The Washington State Affordable Housing Advisory Board commissioned a general statewide housing needs assessment in 2015 (Mullin & Lonergan Associates, 2015). This needs assessment did not specifically address the housing needs of Native communities or farmworker populations, two groups with distinct and acute housing needs.

To fill these data gaps, in 2019, the Washington Department of Commerce consulted with Native organizations and service providers in King County to develop a scope of work and budget for the project using proviso funding and incorporated them in the process of selecting the consultants to conduct this study. A separate

¹⁴ Pindus, et al., 2017

report addressing the housing needs of farmworkers was also commissioned by the Washington State Department of Commerce.

History of Native communities in Washington

American Indian Tribes

Washington has a long history of Native habitation dating back over 12,000 years. Archaeologists believe the rich and diverse landscape supported a population of likely tens of thousands of people until white settlers arrived in the mid-1800s. These white settlers brought a host of unfamiliar and devastating diseases for which the Indigenous population of the area had no immunity. Smallpox, in particular, wiped out as many as 90% of the population of some Tribes by the time Washington became an official US territory in 1853 (Center for the Study of the Pacific Northwest, University of Washington, n.d.). A series of treaties from 1854-1856 ceded a large portion of Native lands to the U.S. government and established numerous reservations. Some treaties in this period assured Tribes the right to fish at "usual and accustomed grounds and stations" (Washington Governor's Office of Indian Affairs, 1854), but during the next 50 years, Euro-American immigrants — armed with larger boats, modern technology, and the regulatory muscle of the state — gradually displaced them. In 1865, the City of Seattle passed an ordinance expelling and banning all Native Americans from the city (King County Council, 2015). Native people could only enter Seattle if they had permission from a non-Native for the purpose of work, thus forcing many Coast Salish people to leave their traditional lands to live on the Port Madison, Tulalip, Swinomish, and Lummi reservations.

In the 1950s, the federal government sought to force assimilation of Tribes and Tribal members by passing a series of harmful laws during a period often referred to as the Termination and Relocation Era.¹⁵ Several Tribes were effectively dissolved, their lands sold, and their members relocated to other more urban or non-Tribal areas. During this period, the Indian Relocation Act of 1956 provided incentives for thousands of Tribal members to leave their communities and move to large cities, including Seattle, which often left these individuals isolated and alone, without sufficient funds to afford costly urban housing, and at the mercy of landlords and others who preyed upon and took advantage of their lack of familiarity with the costs and dangers of urban living. Seattle's Native population grew from an estimated 700 people in 1950 to over 4,000 in 1970. In combination with the forced removal of Indian children from their families to be educated in boarding schools, where they were punished for using their language or acknowledging their Native cultures or traditions, this era contributed to intergenerational trauma, which is still experienced by Tribal members, their children and grandchildren,¹⁶ and is addressed by Tribal programs and urban Native service providers, including the Chief Seattle Club, Seattle Indian Health Board, United Indians of All Tribes Foundation, and Mother Nation. During this same period, despite the fishing and other rights reserved by Tribes in their treaties with the federal government, the construction of dams along the Columbia River flooded Tribal fishing sites and homes, an act for which the federal government is only now seeking to fully compensate Tribes after more than 60 years.¹⁷

The 1970s ushered in an era of self-determination for Tribes and urban Native communities. While the 1960s and early 1970s brought new attacks by the state on Tribal fishing rights and fishermen, these conflicts culminated in the "Boldt Decision," which recognized the right of Tribes to an equal portion of fish (50-50) as

¹⁵ Allen, n.d.

¹⁶ Ibid.

¹⁷ U.S. Army Corps of Engineers, Portland District, 2013

non-Tribal members.¹⁸ In 1970, Native activists led by Bernie Whitebear launched a coordinated effort to occupy Fort Lawton, a decommissioned Army installation in Seattle, and establish it as a cultural and social services center for Seattle's growing Native American population, an effort which ultimately resulted in a transfer and dedication of 40 acres of land for what is now the Daybreak Star Cultural Center within the City's larger Discovery Park.¹⁹ Several significant Native organizations and service providers, including the Chief Seattle Club, Seattle Indian Services Commission, Seattle Indian Health Board, and United Indians of All Tribes Foundation, were established between 1970 and 1972. In 1975, Congress passed the Indian Self-Determination and Education Assistance Act, which increased Tribal autonomy, enabled Tribes to contract with the federal government to directly administer vital programs, and paved the way for future laws and programs that affirmed and advanced Tribal sovereignty and authority to manage Tribal programs.²⁰

To recognize and advance Tribal self-determination in developing and operating housing, the federal Native American Housing Assistance and Self-Determination Act (NAHASDA) statute passed in 1996.²¹ This law officially separated the administration and funding of public and Indian housing within HUD, established the Indian Housing Block Grant, and expanded Tribal self-determination in managing Tribal housing programs. In the following 20 years, three Tribes in Washington received federal recognition, restoring their access to federal funding and enabling them to define service areas to serve their members and other members of federally recognized Tribes (but leaving them without reservation lands).²² As a result, the current era of self-determination enabled Indian Tribes to begin to fully claim and exercise their treaty rights, expand their authority to manage their programs and resources, grow and diversify Tribal enterprises, and develop genuine government-to-government relationships. Urban Native organizations have also expanded their relationships with city, county and state agencies as well as philanthropic entities, which has enabled these organizations to participate in planning processes and to receive funds, for example, from the City of Seattle to develop affordable housing and provide rental assistance to low-income Native families.²³

Alaska Native communities

Early migration of Alaska Natives into Washington was primarily for accessing education, or for trade and other economic opportunities, according to key informant interviews. In Alaska, available education for Natives was restricted to mandated boarding schools, and many Alaska Native villages did not have their own schools until the late 1970s. Many Alaska Native children came to Washington and the West Coast through the child welfare and foster care systems. Before the passage of the Indian Child Welfare Act in 1978, large numbers of Alaska Native children were removed from their homes and families and either put up for adoption or placed in foster care, primarily with non-Native households. It was not until 2001 that the state of Alaska required state courts to transfer these Native child welfare cases to Tribal courts. Alaska Natives are also drawn to Washington by the fishing industry. Fishing is a primary industry in Southeast Alaska, and many Alaska Natives have moved to Washington and other contiguous U.S. areas to join fishing crews. Inter-marriage between Alaska Natives and Washington Tribal members is common, which often enables Alaska Native spouses and their children to access Tribal resources and services.

Data sources, including ACS, often combine American Indian and Alaska Native into a single category. Because of the prevalence of this combined category, it is difficult to disentangle numbers for these

¹⁸ Crowley & Wilma, 2003

¹⁹ Madsen, n.d.

²⁰ Strommer & Osborne, 2015

²¹ HUD, 1996

²² Governor's Office of Indian Affairs, 2021; Bureau of Indian Affairs, 2000; Bureau of Indian Affairs, 1999; Samish Indian Nation, 2017

²³ Beacon Development Group, 2020

populations. In the body of this report, data for Alaska Natives will often be included in the general American Indian/Alaska Native (AIAN) category.

Native Hawaiian communities

Washington has one of the highest populations of Native Hawaiians outside of the state of Hawaii.²⁴ According to members of a focus group, many came seeking better jobs, education, and opportunity. Most Native Hawaiian transplants in Washington live in the Seattle-Bellevue-Tacoma metropolitan statistical area, though ACS data indicate that they are more likely to live outside Seattle in south King County and Pierce County. A focus group participant said that this is due to high rent and other living costs in Seattle. While there are no dedicated organizations specific to Native Hawaiians for providing housing or other basic services, there are many cultural groups and organizations that bring together the Native Hawaiian community. Focus group participants reported that Hawaiian food, shops, radio, Hula, and outrigger canoe paddling are some of the myriad ways that the Hawaiian community coalesces. Housing and other service needs are frequently met by other community members in an unofficial capacity, such as one family letting another family stay with them until they can afford their own housing. Outside of community and familial support, the primary service options for Native Hawaiians in Washington include those that are provided to the general population by government and nonprofit entities, such as public housing, as well as those specific to members of the Native or indigenous community by organizations, such as the Chief Seattle Club and United Indians of All Tribes Foundation. Study participants also noted that most Native Hawaiians are multiracial and frequently seek services through organizations that serve other racial identities, often through organizations serving the Asian or Pacific Islander communities.

Data sources often combine Native Hawaiians and Pacific Islanders into a single category. Due to the frequency of this combined category, it is difficult to disentangle statistics for these populations, despite the fact that Pacific Islander populations are not within the scope of this study. In the body of this report, data for Native Hawaiians will be presented in its most granular form, which is most often as a single category for Native Hawaiians and Pacific Islanders (NHPIs).

History of Native housing in Washington

In pre-colonial times, housing instability and homelessness were not present in Native culture.²⁵ Along the Puget Sound, Tribes lived in shoreline longhouse villages. Multigenerational extended families or families connected by marriage tended to live together in these large dwellings.²⁶ During the warmer months, village members would come and go, collecting resources and trading with neighboring Tribes and villages. For coastal communities, salmon runs provided a significant portion of their annual food supply, and every able community member helped in the catching, cleaning, and preserving of the fish. The longhouses also served as community gathering spaces where stories and legends (syayhub) were passed down orally through generations. Village life continued much in this way until the first treaties with the U.S. federal government in 1854 and 1855. In Eastern Washington, many Tribes followed the plains traditions, catching river salmon, hunting large game, and living nomadically following the traditional seasonal cycles of food availability.

Many Pacific Northwest Tribes practiced traditions similar to potlatch, a ceremony of gift-giving and feasting in celebration of an important event.²⁷ Sharing possessions and the practice of a gift economy was a way of

²⁴ We Count Washington, 2020

²⁵ Seattle Indian Services Commission, 2019

²⁶ Watson K. G., 1999

²⁷ The Bill Reid Centre, n.d.

displaying wealth and social status, which differed from the private property and wealth accumulation values of white settlers and missionaries, who outlawed the tradition in both the United States and Canada.²⁸ However, the Native values of distributing wealth and the absence of personally owned property were core reasons why homelessness and a lack of adequate housing were not present in Native cultures and did not appear until the privatization of property was forced onto Native communities.

In the 1850s, President Franklin Pierce tasked Isaac Stevens with negotiating treaties with Tribes “for the quieting of Indian title” to allow white settlers to move onto land perceived as more favorable.²⁹ These treaties resulted in the ceding of a large portion of Tribal land to the U.S. government and established numerous reservations, including the Yakama and Tulalip reservations. Reservation lands tended to be distant from cities and places with built and planned infrastructure, and typically had poor soil quality.³⁰ The treaties with Tribes on the Olympic Peninsula came in the midst of a smallpox epidemic that killed almost half of the Native people along the coast. Tribal affiliation was based more on familial ties and kinship than political organization, and the loss of so many lives often disrupted connections within and between neighboring but autonomous bands, making it difficult to define Tribes or Tribal boundaries.³¹

Many of these treaties included obligations to provide free education.³² This brought about the beginning of the Indian boarding school movement, which sought to forcibly assimilate Native people into white culture by removing children from their homes and placing them in government-run institutions to prevent them from being influenced by their own cultural traditions. Christian missionaries also ran schools, some of which were federally funded. These schools discouraged traditional religious and cultural practices and instead taught Christian religious doctrine. Schools followed directives received from the Bureau of Indian Affairs, which insisted that Native students learn English, severely punishing any student caught speaking their own Native language. This type of education became federally mandated in 1893, and parents who refused to send their children away to school had rations withheld and were even sent to jail.³³ Living conditions at the schools were frequently poor, and illness and death were common occurrences.

History of federal Native housing assistance

The Housing Act of 1937, also known as the Wagner-Steagall Act, provided federal subsidies to local public housing agencies in order to improve housing conditions for low-income families, primarily in urban areas.³⁴ In the 1960s, the Kennedy administration extended public housing assistance to Indian reservations, a reversal of the 1950s era termination efforts to assimilate Native Americans by dissolving Tribes, removing people from reservations, and erasing cultural practices to disrupt Tribal allegiances.³⁵ Due to the Relocation Act of 1956, over 12,000 Native Americans were strongly encouraged to relocate to cities by decreasing subsidies to those living on reservations and paying for moving stipends, though many returned to their reservation homes after relocation attempts ended.³⁶ A BIA study conducted in 1962 found that around 70% of Indians living on reservations had inadequate housing and that unemployment rates ranged from 45% to 98%. A 1964 IHS study found that only 15% of American Indians had safe drinking water and adequate sewage facilities. While Housing Act programs included some assistance for Indian housing development through Indian Housing

²⁸ Cole & Chaikin, 1990

²⁹ Center for the Study of the Pacific Northwest, n.d.

³⁰ Schaefer, 2016

³¹ Center for the Study of the Pacific Northwest, n.d.

³² Marr, n.d.

³³ McBride, 2013

³⁴ Biles, 2000

³⁵ Senate Committee on Banking, Housing, and Urban Affairs and the Committee on Indian Affairs, 2010

³⁶ Nesterak, 2019

Authorities (IHAs), housing assistance on reservations was provided as an extension of other public housing programs, which still did not recognize the sovereignty or unique cultural differences of Tribes.³⁷ Because of the remote and rural locations of many reservations, housing development for Indian Housing Authorities was difficult and expensive, and as a result, rental costs were higher than many tenants could afford. The HUD-controlled IHAs had fiscal and operational independence from Tribal governments, which frequently caused local tensions between the two bodies.³⁸

The HUD-commissioned Assessment of American Indian Housing Needs and Programs, completed by the Urban Institute in 1996,³⁹ was a comprehensive national study of housing conditions and resources in Native American communities. The study documented the two dominant forms of housing assistance in Tribal areas: the Rental program, which operated like public housing, and the Mutual Help program, a homeownership (lease-purchase) program, in which buyers made monthly payments. Unlike Rental program tenants, those living in Mutual Help program housing covered their own operating and maintenance expenses. Both programs (often referred to as 1937 Act programs) were administered by IHAs, agencies whose boards are appointed or elected by the Tribes they serve.

The 1996 study reported that the housing provided under the 1937 Act accommodated about one quarter of all American Indian and Alaska Native (AIAN) households living in Tribal areas and substantially improved living conditions for thousands of families. However, the findings related to housing conditions echo those of the earlier BIA and IHS studies cited previously. For example, on reservations and in other Tribal areas, the study found, using Census data, that 28% of AIAN households were overcrowded or lacked plumbing or kitchen facilities (the comparable average for all U.S. households at the time was only 5.4%).

The study also documented the tremendous diversity of Tribal areas, ranging from extremely isolated and poor Tribes to somewhat better-off Tribes located nearer metropolitan labor and housing markets. Because of this diversity, the study ultimately concluded that Tribes needed a more flexible funding source, since existing statutory restrictions prevented capable local administrators from using program resources as efficiently and equitably as possible based on their own Tribe's circumstances.

These recommendations informed the debate that ultimately led to the acceptance of the block grant approach. The Native American Housing Assistance and Self-Determination Act (NAHASDA) passed in 1996 in order to acknowledge and promote Tribal sovereignty in addressing low-income housing. Under the new act, annual Indian Housing Block Grant funds were allocated directly to Tribes, who could then develop low-income housing according to the needs of their own communities.⁴⁰

Subsequent studies by the U.S. Government Accountability Office in 2010, 2014, and 2015 examined various aspects of Native American housing development and funding, including NAHASDA's effectiveness, challenges faced by Tribes, and the formula used to allocate IHBG funds (U.S. Government Accountability Office, 2010). The 2010 report found that NAHASDA was considered a welcome improvement by Tribes, but that Tribes continued to face challenges to development. In late 2010, the U.S. Department of Housing and Urban Development commissioned a national housing needs assessment. Completed in 2017 by the Urban Institute, "Housing Needs of American Indians and Alaska Natives in Tribal Areas"⁴¹ remains the only comprehensive national study of the housing needs of American Indians and Alaska Natives since NAHASDA

³⁷ Biles, 2000

³⁸ Ibid.

³⁹ Kingsley, et al., 1996: This and other studies cited in this section are described further in Appendix A (Literature Review)

⁴⁰ HUD, 1996

⁴¹ Pindus, et al., 2017

was implemented. This study presents national benchmarks that provide context for the current study. The national study suggested categories, definitions, survey questions and analytic approaches that informed our methodology for studying Native housing needs in Washington.

The Urban Institute study also documents the diversity across Tribal areas and continued challenges faced by Tribes regarding infrastructure, housing and economic development, and funding. As Pindus et al. reported in 2017, the overall economic well-being of the AIAN population generally remains worse than that of non-AIANs almost everywhere, and more so for AIANs in Tribal areas than for AIANs living in other parts of the country.

However, Pindus et al. also found that, during the past two decades, there have been advances in socioeconomic conditions in many Tribal areas, which offers promising models for change. Advances include improvements in higher educational attainment and vigorous initiatives by Tribes exercising their self-determination to drive economic development. As shown in the Pindus study, Tribes have demonstrated the capacity to construct and rehabilitate housing for low-income families at substantial levels under the NAHASDA framework, and Tribes prefer operations under NAHASDA to the previous system because it enables Tribes to design, develop, and operate their own affordable housing programs based on local needs.

This background is important in understanding Tribal housing needs, challenges, and successes in Washington. A national study has limitations because it cannot provide estimates for smaller geographies or information on individual Tribal areas, or even regional breakdowns. Nor can it consider the unique situations of individual states, such as geography, historical and political context, or state housing and development programs.

The 2017 study "Housing Needs of American Indians and Alaska Natives in Urban Areas" provides context for the study of urban Native housing in Washington.⁴² Prepared by Urban Institute as part of the HUD Assessment of American Indian, Alaska Native, and Native Hawaiian Housing Needs for HUD and completed in 2017, this report describes housing conditions, opportunities, and challenges experienced by American Indians and Alaska Natives (AIANs) who live in metropolitan areas, mostly outside of reservations or Tribal lands. The research focused on economically disadvantaged Native households, both Tribally enrolled and not enrolled (see [Appendix A](#) for more information).

While the Levy et al. study's findings cannot be generalized to the national AIAN population or to Washington's urban areas specifically, they are consistent with the findings of project coordinators in the current study. The Levy et al. study of AIAN housing needs found that the urban Native population is disproportionately economically disadvantaged and faces cultural and experiential barriers to accessing services and achieving a measure of housing security and stability.⁴³ They are more likely to live in substandard housing, be cost-burdened and to live in housing that is overcrowded, either by choice – to live with extended family, or by necessity – to manage housing costs. Homelessness among AIAN populations was identified as a serious problem in many of the areas served by study participants.

Native housing needs studies and community assessments pertaining to Native communities in Washington

Washington State Housing Needs Assessment (2015)

⁴² Levy, Biess, Baum, Pindus, & Murray, 2017

⁴³ Levy, Biess, Baum, Pindus, & Murray, 2017

The state of Washington commissioned a statewide housing needs assessment in 2015.⁴⁴ The needs assessment covered a range of baseline housing indicators for comparison with later updates, and analysis of rental housing supply, publicly funded housing, and homeownership trends. The study looked at existing housing supply, both rental and homeownership, the inventory of subsidized housing, and those households that could not afford housing. The assessment did not include an evaluation of the housing status and needs of Native people or farmworkers, two populations with distinct housing needs, nor did the assessment address how to solve the affordable housing gap or address the large numbers of cost-burdened households. Native organizations within Washington noted the lack of Native inclusion in the report. This study was commissioned by the Washington Department of Commerce Community Services and Housing Division via a request for proposal (RFP) using proviso funding to address Native housing needs in Washington. A separate effort was conducted to address the needs of farmworkers.

King County AIAN Housing Needs Assessment (2018)

The Seattle Indian Services Commission conducted an assessment of the housing needs of AIAN individuals living in King County in 2018.⁴⁵ Information collected via a survey, focus groups, and interviews demonstrated the needs of the Native population in the urban core of King County and was used to help guide the Commission's planning efforts for supportive services and designing a new urban affordable housing development.

The study's intercept survey received 541 survey responses that provided a snapshot of the living conditions of AIAN individuals who lived in or received services in King County. Among these respondents, the top three barriers to finding a home to buy or rent included not making enough money for rent or mortgage, having bad or poor credit, and an inability to find or afford the amount of housing necessary where they wanted to live. About half of respondents required a home for one individual (32%) or two individuals (25%), while 31% required a home for five or more individuals. The survey also showed that AIAN individuals experiencing homelessness did not stay at shelters because they felt unsafe and because they could not keep their possessions safe at shelters.

Vision for the Urban Indian Community (2014)

United Way of King County also published a report concerning the AIAN population in King County, with a focus on urban Indians.⁴⁶ The report found that, compared to the general population of King County, AIANs tended to be younger, have lower household incomes, and live outside the urban core, likely due to displacement from gentrification. The lack of concentration of this population in urban centers created difficulties for service organizations, which are usually located in downtown areas. The urban King County AIAN population had lower rates of high school and college attainment. Homeownership among AIANs was lower compared to the overall population nationally, as seen in other studies cited here, but the difference was vast in Washington and even more so in King County. The report showed that the homeownership rate in King County for AIAN households was 37%, compared to 60% for the general population. As noted in the SISC King County report, there were a disproportionate number of AIAN people experiencing homelessness in King County, which was consistent with national data on homelessness. Many urban Native individuals had difficulties accessing services such as health care, because they did not live on Tribal land or they were not Tribal members.

⁴⁴ Mullin & Lonergan Associates, 2015

⁴⁵ Seattle Indian Services Commission, 2019

⁴⁶ Kauffman & Associates, 2014

The United Way report also noted funding challenges specific to urban Indian populations that do not have access to federal funds received through Tribal governments, a population traditionally underserved by mainstream funding sources. Since this report was completed in 2014, it is likely that rising costs of living have further displaced urban Native communities away from the city center and, subsequently, away from the social services and community ties meant to support them.

Existing data describing Native populations and housing

Demographic and economic data from the American Community Survey (ACS)⁴⁷ show that AIANs and Native Hawaiian and Pacific Islanders (NHPIs) tend to be younger, have lower rates of employment, and may be more likely to experience disability as they age in comparison to other groups. ACS data from 2019 indicates that Washington is home to over 103,000 American Indian and Alaska Native persons who self-identified as “single-race,”⁴⁸ and over 228,000 people (3.08% of the population) who self-identified as American Indian and Alaska Native in combination with other races. Approximately 1.3% of households in Washington had a single-race AIAN head of household. According to ACS estimates, 0.46% of households had a single-race Native Hawaiian or Other Pacific Islander head of household and 1.26% of the population, approximately 93,739 was Native Hawaiian and Pacific Islander alone or in combination with other races.⁴⁹

Geography

AIANs are more likely to live in rural areas, and NHPIs tend to live in urban areas, compared to the rest of the state’s population. According to ACS data, 84.7% of households statewide live in urban areas, but 66% of single-race AIAN-headed households live in urban areas and 96.1% of Native Hawaiian and Pacific Islander-headed households live in urban areas. King County is home to the largest proportion of AIANs and Native Hawaiian and Pacific Islanders, accounting for approximately 20% of AIANs and 32% of Native Hawaiian and Pacific Islanders statewide.

The below maps show the distribution of AIANs and Native Hawaiians and Pacific Islanders throughout Washington, both in raw numbers and by the percentage of the overall population (see figures 1-4).

⁴⁷ The American Community Survey (ACS) is an ongoing statistical survey conducted by the U.S. Census Bureau. The ACS has approximately 250,000 monthly respondents, totaling 3 million respondents per year. ACS publishes annual estimates for geographies with more than 65,000 people. Because of the smaller sample size compared with the decennial census, the Census Bureau averages 5 years of surveys to produce estimates for the smallest geographies, including Tribal areas. Because the ACS produces estimates based on a smaller sample than the decennial census long-form survey, which the Census Bureau stopped conducting after the 2000 decennial census, the estimates are subject to more sampling error than long-form census estimates. The reliability of ACS estimates for areas of smaller population and smaller population groups, like the AIAN population, have been questioned, as discussed in the Study Limitations section of this report.

⁴⁸ Single-race refers people who respond to the race question by indicating or reporting only one race

⁴⁹ U.S. Census Bureau, 2019

Figure 1: Total population – American Indian and Alaska Native alone or in combination with other races



Figure 2: Percent of county population - American Indian and Alaska Native alone or in combination with other races

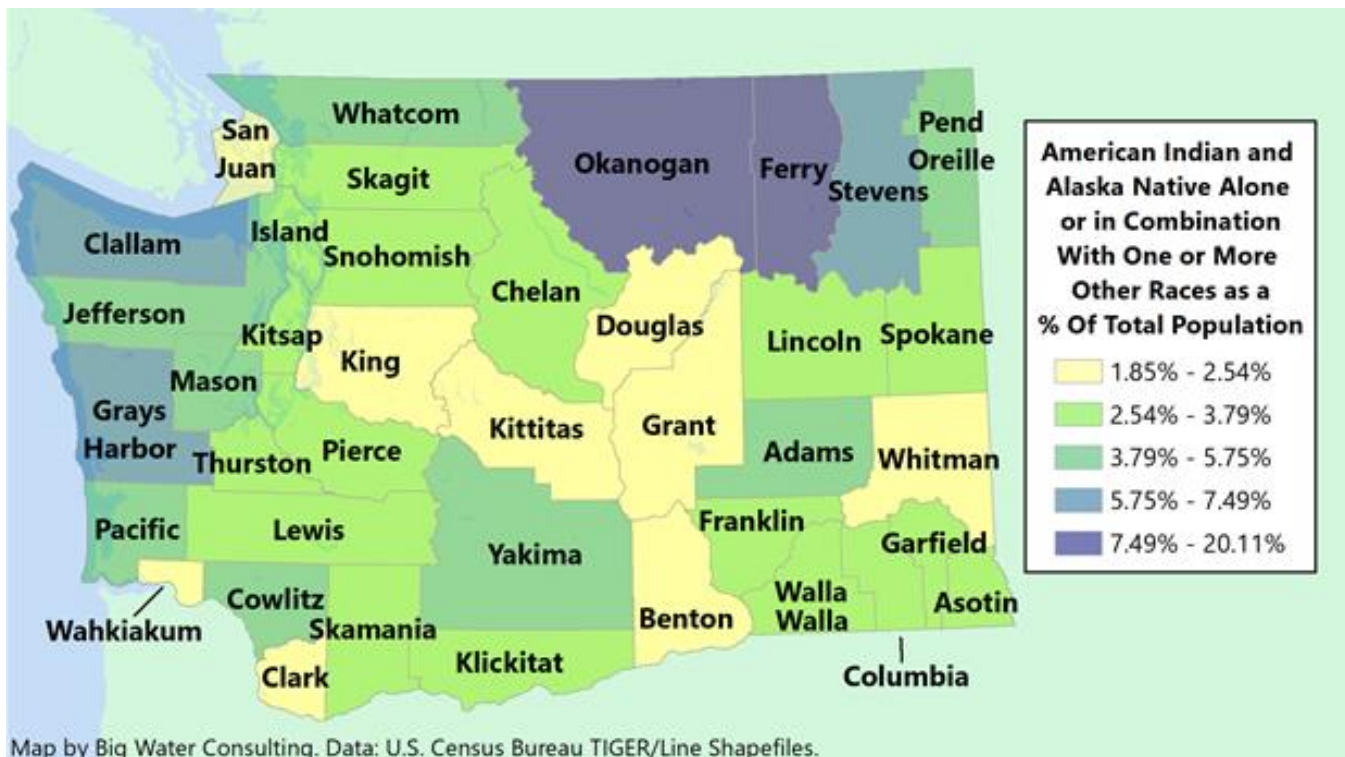


Figure 31: Total population – Native Hawaiian and Pacific Islander alone or in combination with other races

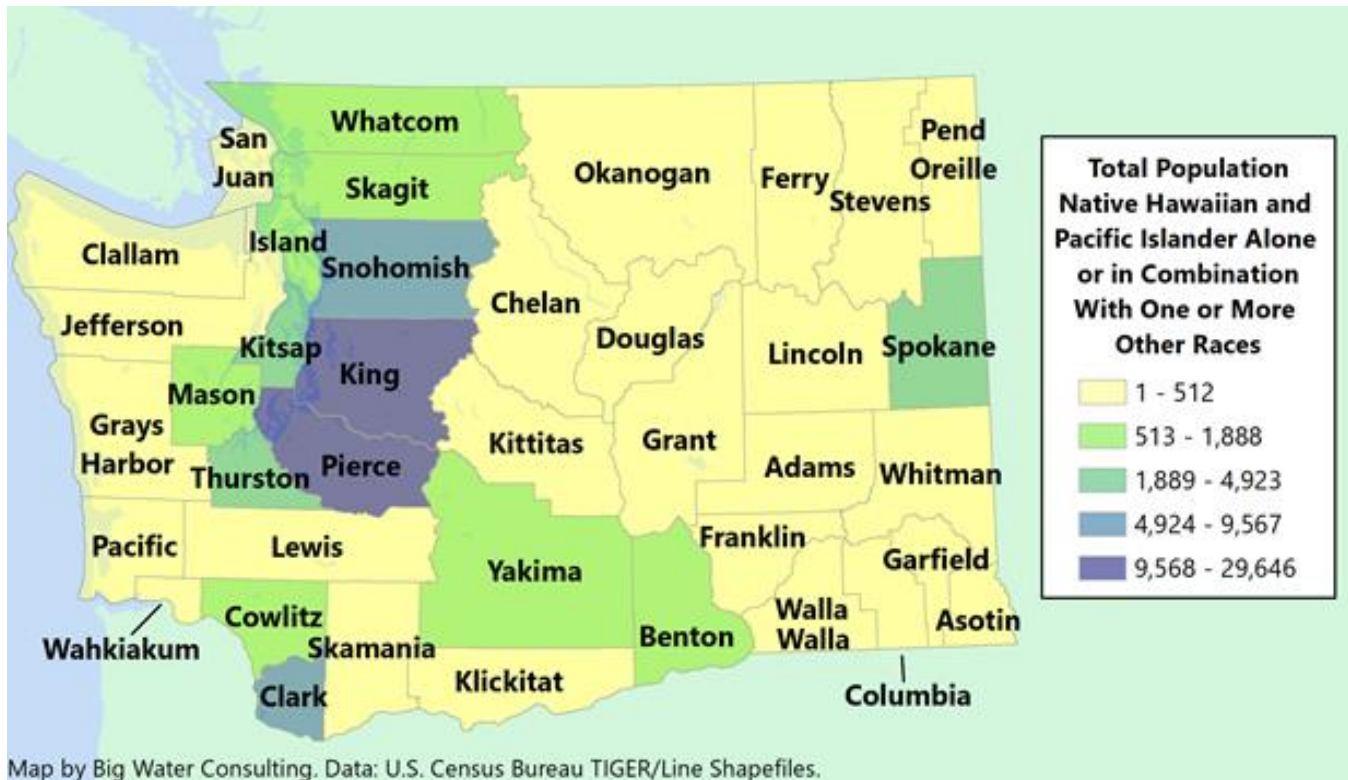


Figure 42: Percent of county population – Native Hawaiian and Pacific Islander alone or in combination with other races



According to ACS estimates, more than a quarter (28.6%) of Washington single-race AIANs live on one of the 29 Indian reservations statewide. Figure 5 shows the locations of the 29 reservations.

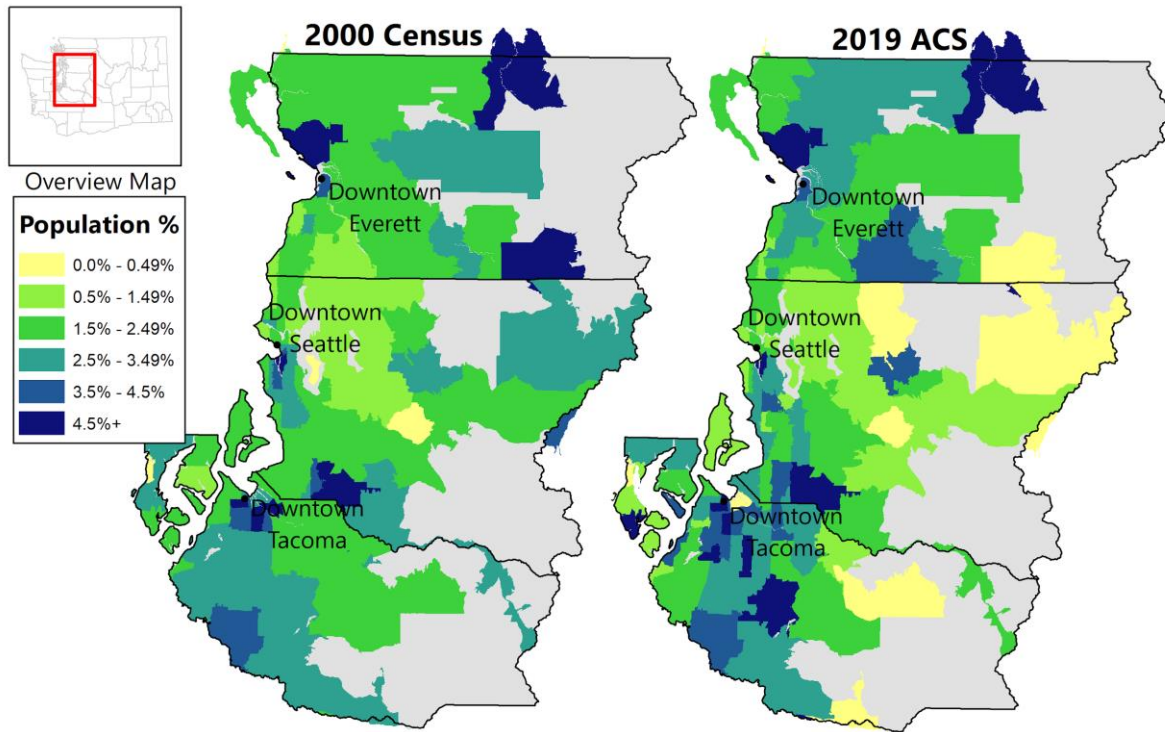
Figure 53: Washington reservation lands



GIS Data source: 2020 U.S. Census Bureau TIGER/Line Shapefiles, map by Big Water Consulting and the Urban Institute

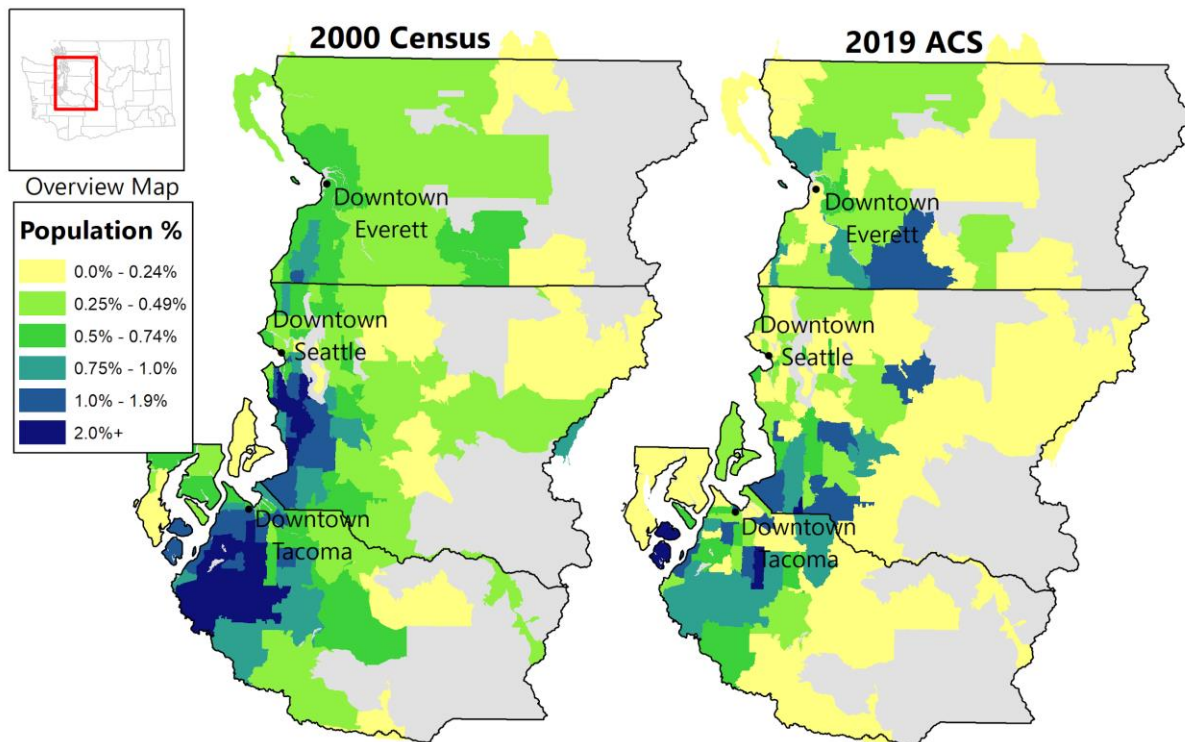
In focus groups conducted as part of this study, urban AIAN and Native Hawaiian participants discussed how rising costs in urban areas have led to the displacement of community members and AIANs and Native Hawaiians now live farther from the most expensive areas in the state's most populous counties. Figures 6 and 7 show, using 2000 Census data and 2019 ACS estimates, that the AIAN population has grown as a proportion of the overall population throughout Snohomish County, much of Pierce County surrounding Tacoma, and in far south King County, but not in east and north King County. Similarly, the NHPI population appears to have grown as a proportion of the population in south Pierce County, south King County, and southwest Pierce County, and decreased in areas north of and surrounding downtown Seattle and Everett. Because these groups are small in proportion to the overall population, 2020 Census data – which was released after this report was drafted – will better indicate the extent of displacement over the past 20 years in the Puget Sound region.

Figure 6: AIANs (single and multi-race) as a percentage of population by ZIP code tabulation area (ZCTA) in 2000 and 2019



Data Source: U.S. Census Bureau 2019 5-Year ACS Estimates, Map by Big Water Consulting

Figure 7: NHPIs (single and multi-race) as a percentage of population by ZIP Code tabulation area (ZCTA) in 2000 and 2019



Data Source: U.S. Census Bureau 2019 5-Year ACS Estimates, Map by Big Water Consulting

Age

The most recent ACS data shows that the median ages of AIANs (32.7 years) and NHPs (31.4 years) are lower than the overall median age in Washington (37.7 years). At the same time, the number of those 65 and older has been increasing among both AIANs and NHPs. The fact that these populations are both young and aging requires housing and housing plans that can adapt to current and future needs.

A population's age dependency ratio is a metric used by the U.S. Census Bureau and a variety of demographers to describe the potential economic output of a population. The ratio is defined as those who are not of typical working age (under 18 or over 64) to those who are of a typical working age (18 to 64). In Washington, the overall age dependency ratio is 59.5. The age dependency ratio of single-race AIANs is about the same at 59.6, while the age dependency ratio of single-race NHPs is lower (34.3). AIANs have a much higher child dependency ratio in comparison to other groups, which can indicate a need for childcare and housing for families, but a lower old-age dependency ratio (see Table 1).

Table 1: Age dependency ratio

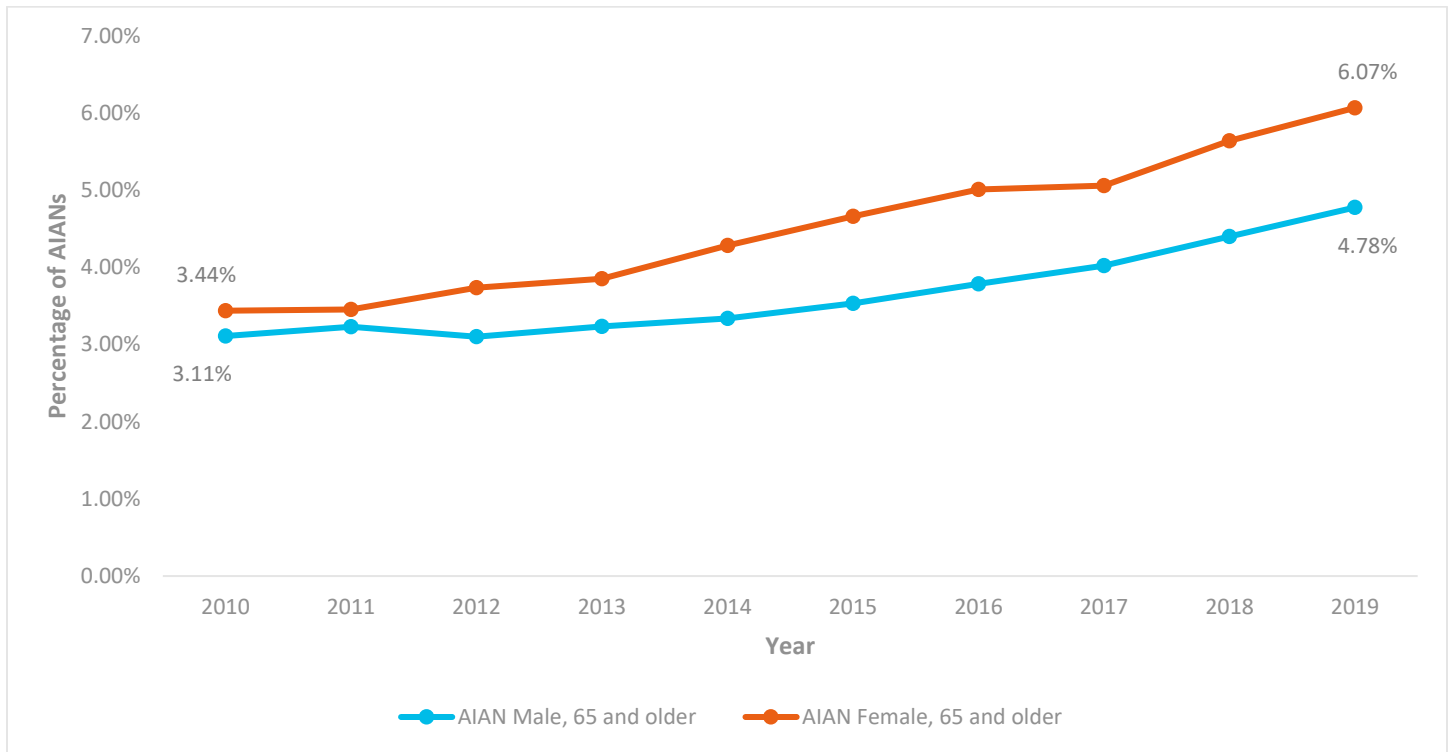
	Washington total	Single-race AIAN	Single-race NHPs
Age dependency ratio	59.5	59.6	34.3
Child dependency ratio	35.4	42.3	27.2
Old-age dependency ratio	24.1	17.3	7.1

Source: American Community Survey, 2019 5-Year Estimates

The AIAN and NHPs populations in Washington are both younger than the state population overall but have increasing numbers of older adults. The proportion of AIANs NHPs age 65 and older in Washington has increased about 1.7 times from 2010 to 2019 (see figures 8 and 9). The U.S. Census Bureau projected that the nationwide life expectancy for AIANs will increase from 76.2 years in 2017 to 84.6 years in 2060, indicating that these trends are likely to continue.⁵⁰

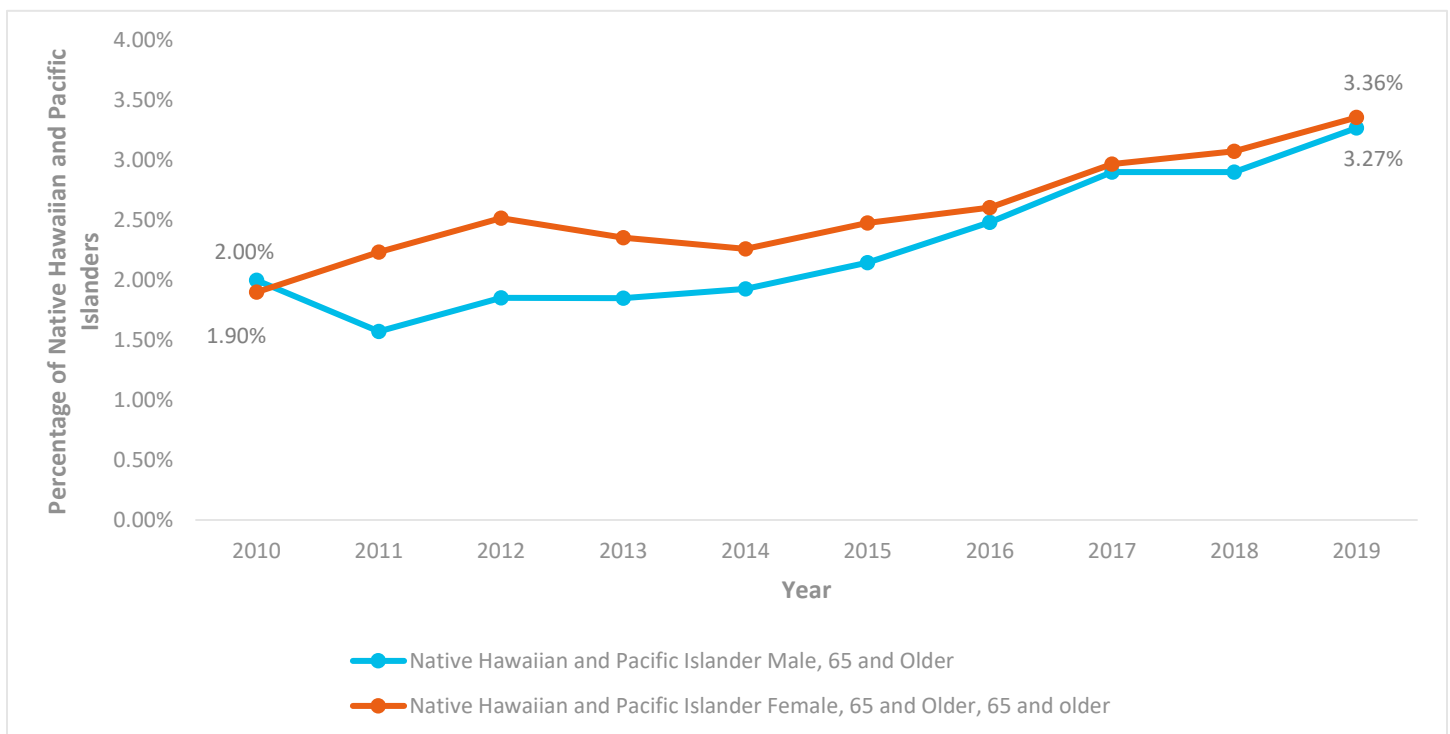
⁵⁰ Census Bureau, 2017

Figure 8: Percentage of American Indian/Alaska Native (single race) over 65 by sex



Data Source: U.S. Census Bureau ACS 5-Year Estimates (2010-2019)

Figure 9: Percentage of Native Hawaiians and Pacific Islanders (single race) over 65 by sex



Data Source: U.S. Census Bureau ACS 5-Year Estimates (2010-2019)

Disability

AIANs experience disabilities at a higher rate than the rest of Washington’s population, especially among those 65 and over. NHPs experience disabilities at a similar rate to the rest of Washington’s population, as shown in Table 2 (U.S. Census Bureau, 2019). Assessing disability is important because housing providers and developers need to consider the needs of household occupants given disability rates as the population ages. AIANs, in particular, will require an increased amount of culturally appropriate housing for aging and elders with a disability over the next 40 years. This includes features for individuals with a disability, including grab bars, safety railings, ramps, lifts, and other equipment and assistive devices.

Table 2: Disability by age group in Washington

Disability status	Washington total	Single-race AIAN	Single-race NHPs
Under 18 years			
With a disability	72,112 (4.0%)	1,313 (5.3%)	53 (0.4%)
No disability	1,589,965 (96%)	23,579 (94.7%)	12,243 (99.6%)
18 to 64 years			
With a disability	474,653 (10.6%)	10,839 (19%)	3,595 (10.7%)
No disability	4,173,411 (89.4%)	46,086 (81%)	29,933 (89.3%)
65 years and over			
With a disability	402,165 (35.5%)	4,602 (45.9%)	962 (33.4%)
No disability	785,147 (64.5%)	5,422 (54.1%)	1,915 (66.6%)

Source: American Community Survey, 2019 5-Year Estimates

Employment, income and poverty

According to ACS 2019 5-Year estimates, both AIANs and NHPs in Washington have higher unemployment rates, earn lower incomes, and are more likely to experience poverty compared to statewide averages. Household income determines the ability of people to afford suitable housing.

Both populations experience higher unemployment rates than the statewide pre-COVID unemployment rate of 5.0%. Among AIANs, 10.5% were unemployed according to ACS 2019 estimates, while 6.9% of NHPs were unemployed. Additionally, AIANs have a labor force participation rate of 57.1% (see Table 3). With higher unemployment rates and a lower labor force participation rate, both AIAN and NHPs households earned lower incomes compared to the Washington median of \$73,775. AIAN households earned a median annual income of \$48,699, while Native Hawaiian and Pacific Islanders earned \$69,165. Maps showing median income by

Washington county for American Indian/Alaska Native and Native Hawaiians and Pacific Islanders are below (see figures 10 and 11).

The household income for 22.3% of American Indian Alaska Natives (single-race) was below the federal poverty level, and 15.4% of Native Hawaiians and Pacific Islanders (single-race) had a household income below the federal poverty level. In comparison, 9.8% of Washingtonians statewide have a household income below the federal poverty level, defined as income below \$21,720 for a household of three people (U.S. Census Bureau, 2019).

Table 3: Unemployment, income and poverty

	U.S.	Wash.	Wash. American Indian and Alaska Native alone	Wash. Native Hawaiian and Other Pacific Islander alone
Household median income	\$62,843	\$73,775	\$48,699	\$69,195
Individuals below 100% federal poverty level	13.4%	9.8%	22.3%	15.4%
Labor force participation	63.4%	64.5%	57.1%	68.7%
Unemployment	5.3%	5.0%	10.5%	6.9%

Source: American Community Survey, 2019 5-Year Estimates

Figure 10: Median household income by county – American Indian and Alaska Native alone head of household

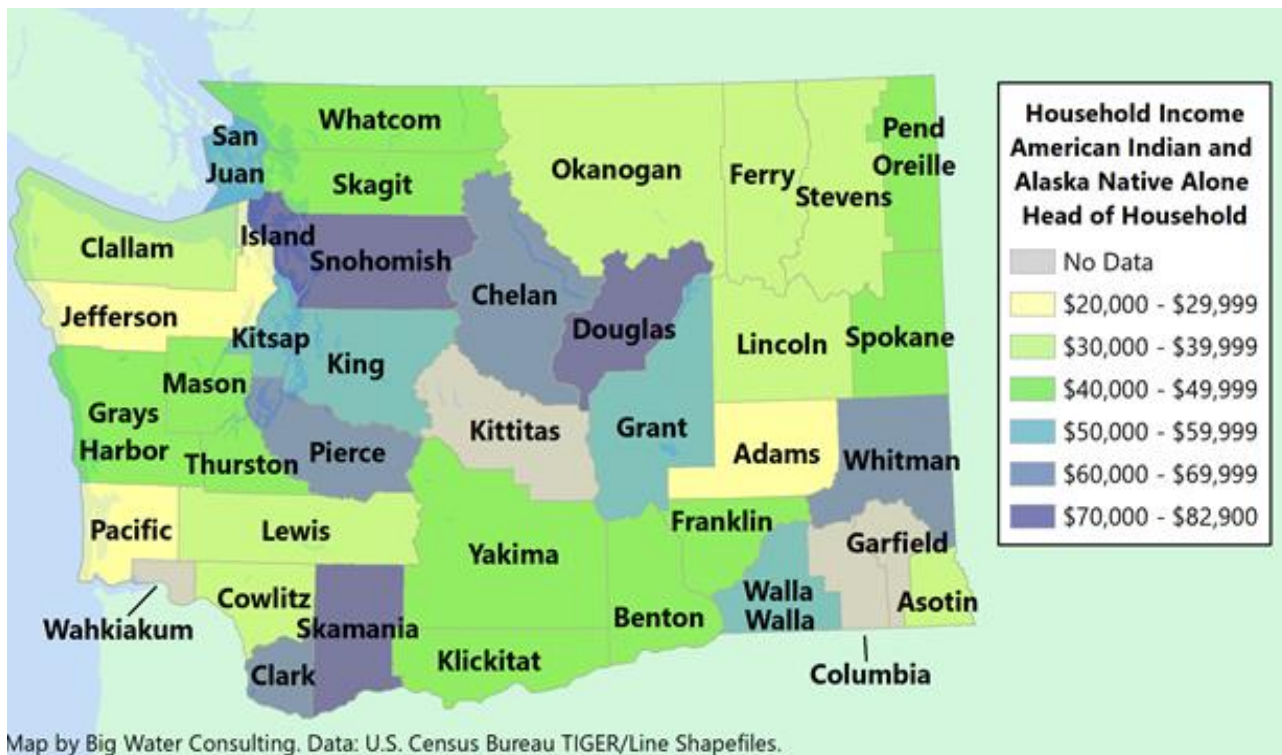
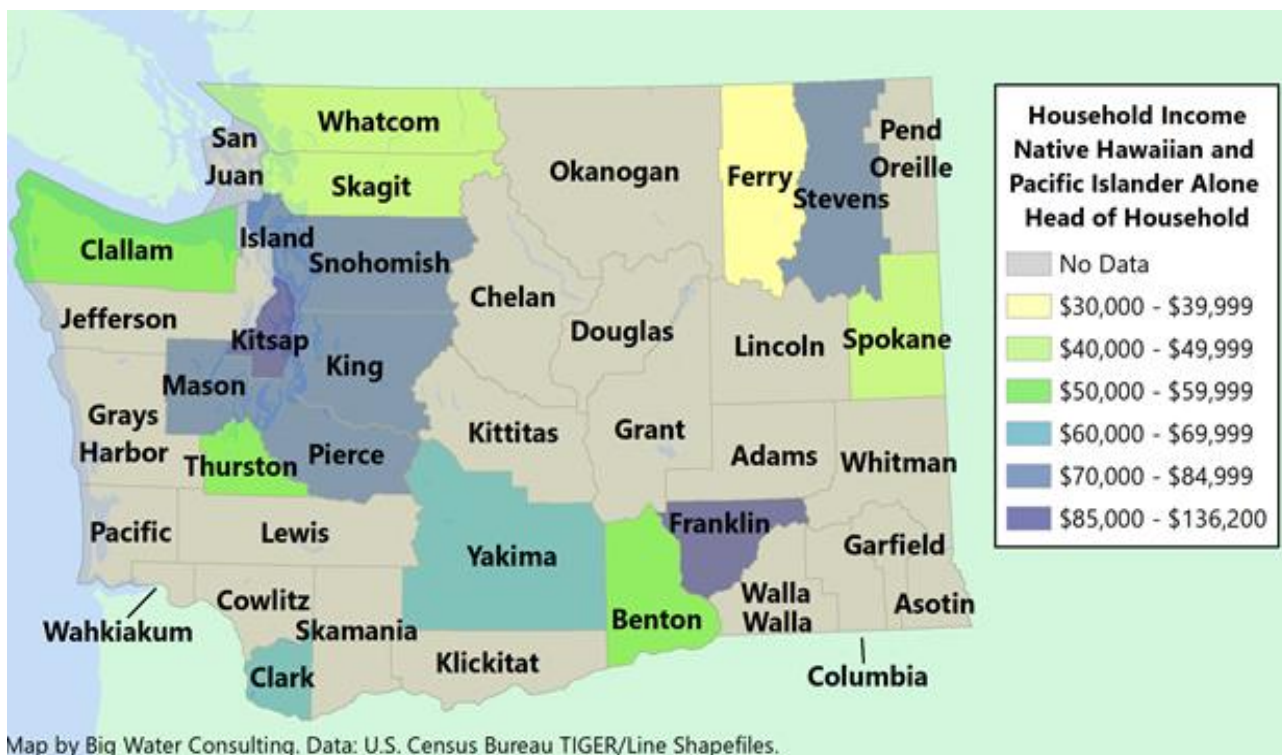


Figure 11: Median household income by county – Native Hawaiian and Pacific Islander alone head of household



Washington housing market data

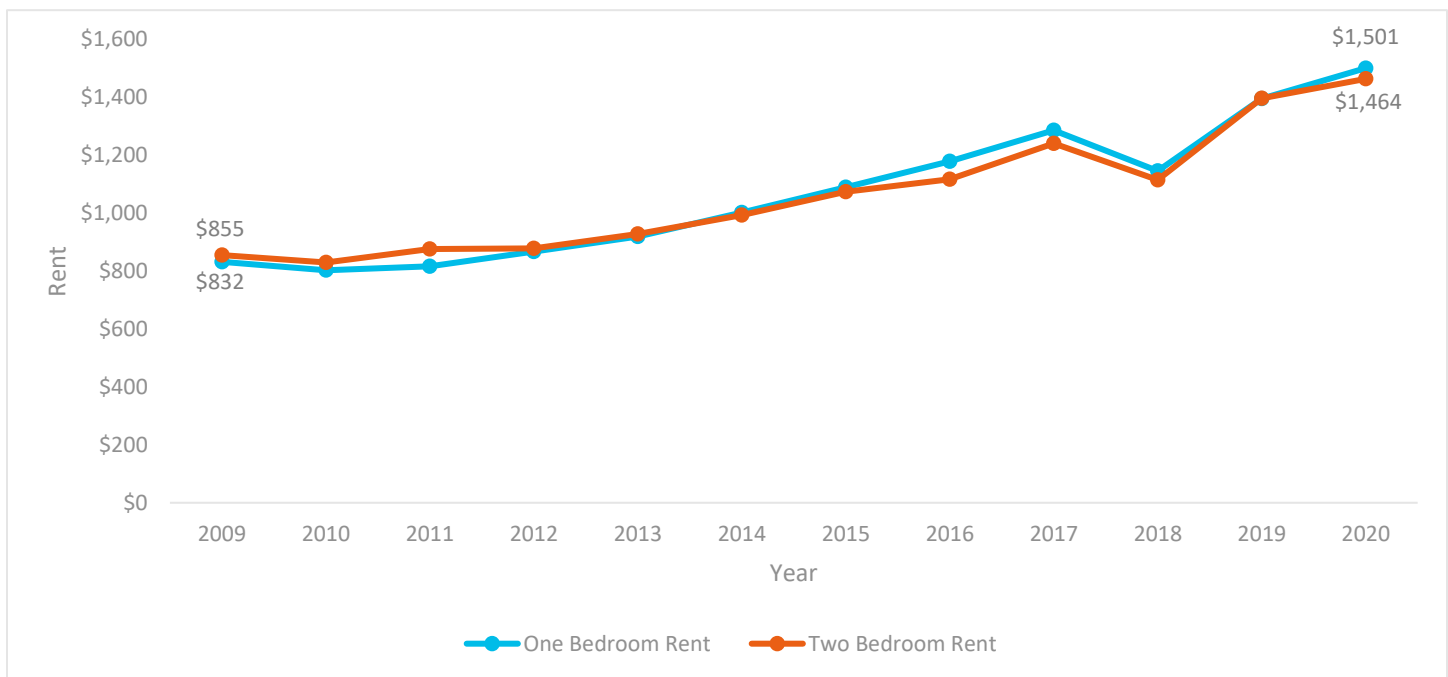
The state's housing market, including rental and home prices, mortgage rates and lending practices, as well as the characteristics and supply of housing, affect the housing options available to AIANs and Native Hawaiians.

Rental prices and cost burden

Average rental prices across the state have increased dramatically over the past decade.⁵¹ This increase coincided with an increase in the state's population and a decrease in the rate of vacant apartments.⁵² Rising rental prices have increased burdens on low-income earners statewide, which has had a disproportionate impact on American Indian/Alaska Native and Native Hawaiians and Pacific Islanders. Among renting households in Washington, 51.7% of AIAN-headed households are cost-burdened (pay more than 30% of their income towards rent), and 46.4% of NHPI-headed households are cost-burdened.⁵³

From 2009 to 2020, rental prices for one-bedroom units in Washington increased by more than 80%, from \$832 to \$1,501, while two-bedroom units, which are more common outside the Seattle metropolitan area, increased in price by 71% from \$855 to \$1,464 as shown in Figure 12.⁵⁴ This increase in price has occurred in tandem with an apparent decrease in rental vacancies statewide (see Figure 13).⁵⁵

Figure 12: Average rent price for one-bedroom and two-bedroom apartments



Data Source: Washington Center for Real Estate Research, Apartment Market Surveys (2009-2020)

⁵¹ Washington Center for Real Estate Research, 2020

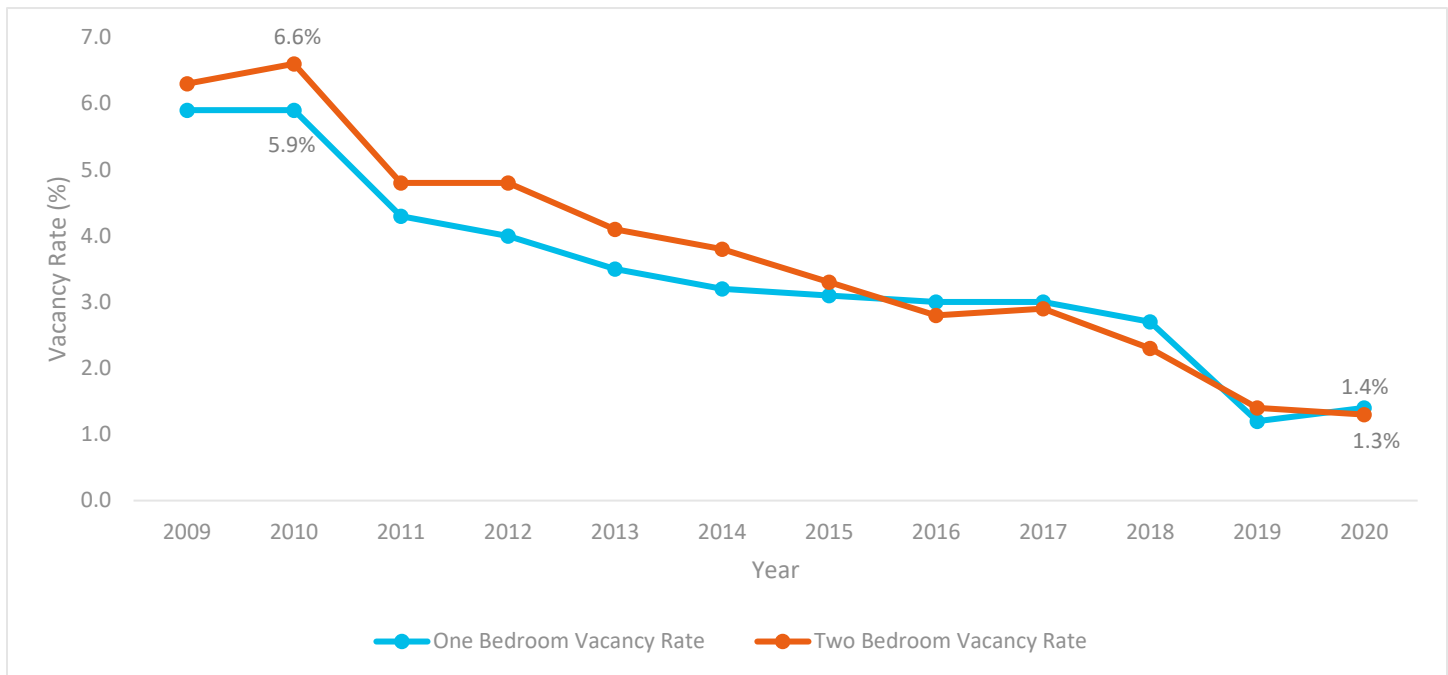
⁵² U.S. Census Bureau, 2019

⁵³ Among single-race and multi-race heads of household. Statewide, 46.2% of renters were cost-burdened, and 22.3% are severely cost-burdened (U.S. Census Bureau, 2019).

⁵⁴ Washington Center for Real Estate Research, 2020

⁵⁵ Due to changes in data collection occurring after 2017, Washington State Apartment Market Report used different sampling methods in subsequent years; this data may not be directly comparable to data in prior years and should be considered illustrative of observed trends (Washington Center for Real Estate Research, 2020).

Figure 13: Rental vacancy rate for one- and two-bedroom apartments



Data Source: Washington Center for Real Estate Research, Apartment Market Surveys (2009-2020).

Fair Market Rents (FMRs), which are defined and published by HUD, represent the 40th percentile of gross rent (including essential utilities) for typical rental units occupied by recent movers in a local housing market. FMRs are developed using local surveys to estimate the fair market rental value, including utilities, for a unit, depending on the number of bedrooms in that unit (see Figure 14). The most expensive counties in Washington, Snohomish and King counties, are a part of the same FMR Area, where the 2020 Fair Market Rent for a two-bedroom unit is \$2,099.⁵⁶ Consequently, in order to afford Fair Market Rent for a two-bedroom unit without undue cost burden,⁵⁷ a household would have to earn more than \$83,960 annually in these counties.⁵⁸

In King and Jefferson counties, median AIAN household incomes are such that the median AIAN household cannot afford a studio apartment offered at Fair Market Rent without being cost-burdened.⁵⁹ In Adams County, a median income AIAN household can only afford a studio apartment rental at an FMR price. In seven counties, a median income AIAN household can only afford up to a one-bedroom unit at FMR (see Figure 15).⁶⁰ For Native Hawaiians and Pacific Islanders, a median household income can afford up to a one-bedroom unit at FMR in five counties, including King, Snohomish, Skagit, Whatcom, and Ferry (see Figure 16).⁶¹ Meanwhile, in terms of household size statewide, the average home with an AIAN head of household has 2.6 occupants, and the average home with NHPI head of household has 3.2 occupants. The Washington average is 2.3 occupants.⁶²

⁵⁶ Department of Housing and Urban Development, Office of Policy Development and Research, 2020

⁵⁷ HUD defines cost-burdened households as those that pay more than 30% of their income for housing.

⁵⁸ Department of Housing and Urban Development, Office of Policy Development and Research, 2020

⁵⁹ Ibid.

⁶⁰ Ibid.

⁶¹ Ibid.

⁶² U.S. Census Bureau, 2019

Figure 14: Fair market rents for a two-bedroom unit, SFY 2020



Figure 15: Affordable, fair market rental unit for median income American Indian and Alaska Native household

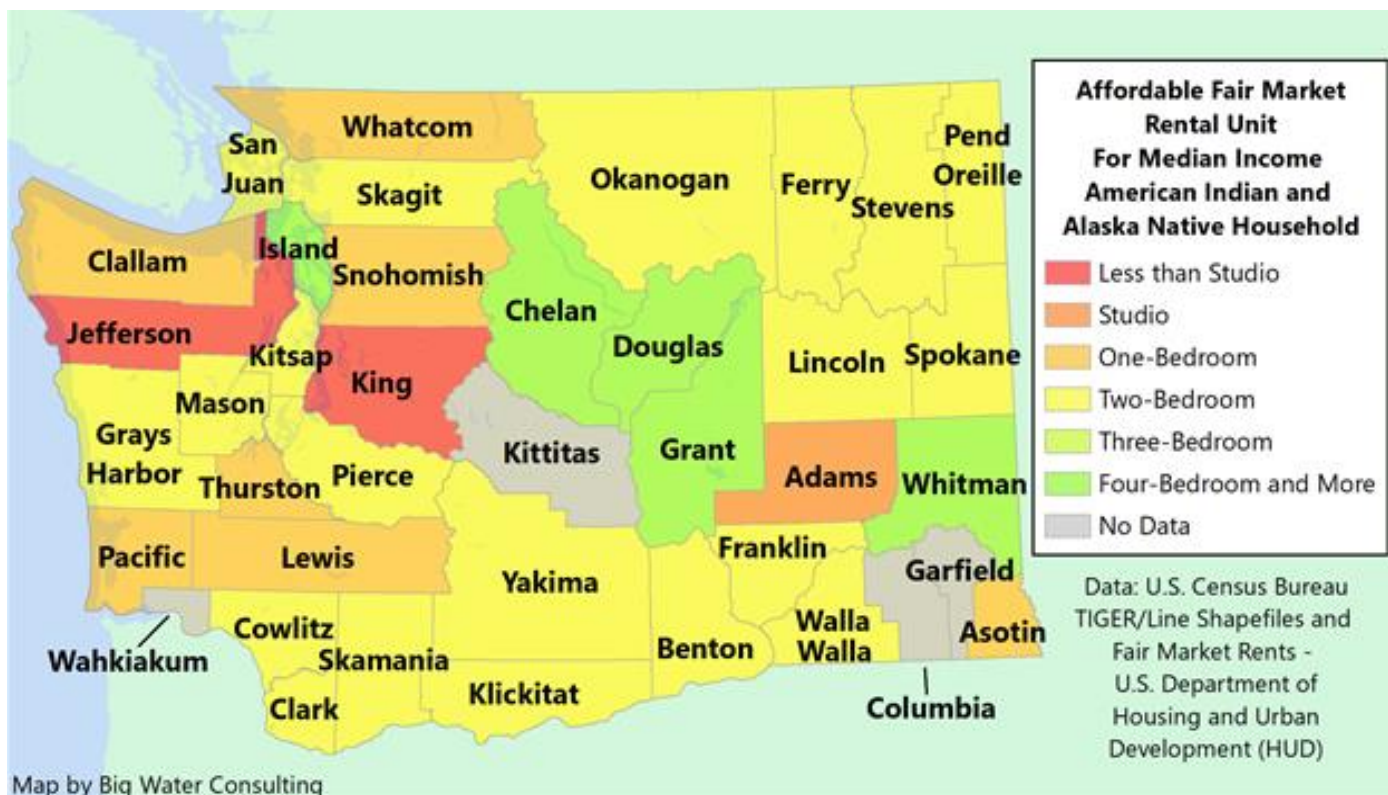
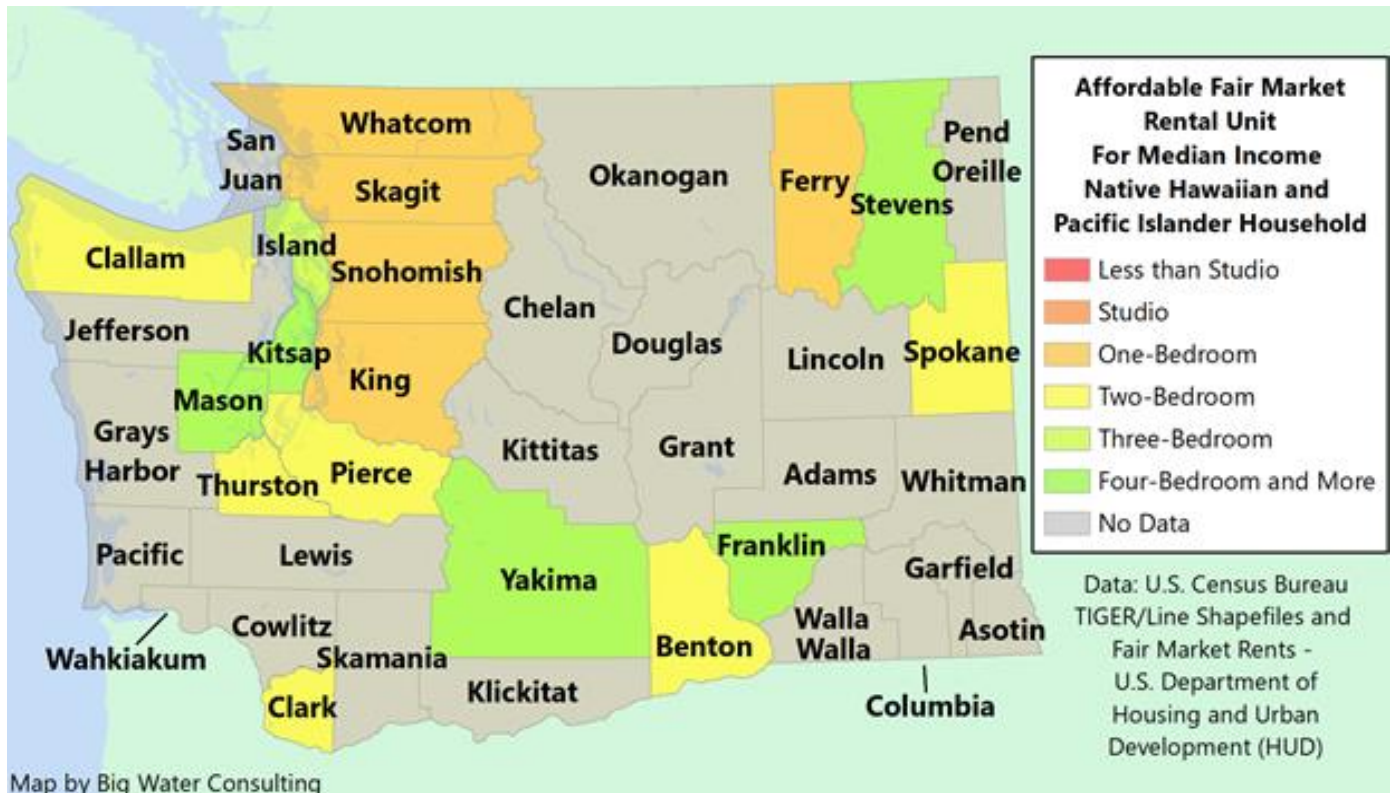


Figure 16: Affordable Fair Market Rental Unit for Median Native Hawaiian and Pacific Islander Household



Home prices and housing affordability

Home prices in Washington have increased steadily since 2011, which has decreased housing affordability in general, but especially for AIANs and NHPs, who have lower median incomes compared to the median household income in Washington overall. The median price for a home in Washington in the third quarter of 2020 was \$452,900,⁶³ which means that for the median AIAN, Native Hawaiian, or Pacific Islander household, monthly housing payments are not affordable without a cost burden greater than 30% of household income.⁶⁴ Statewide, among households that owned their homes, 25.2% of AIAN-headed households were cost-burdened, and 25.6% of NHP-headed households were cost-burdened.⁶⁵ However, housing prices and, consequently, housing affordability varies significantly across the state.⁶⁶

Washington, along with the rest of the U.S., has seen a significant drop in new construction after the 2008 housing recession that has still not recovered to pre-recession levels (see Figure 17).⁶⁷ A recent "New York Times" report stated that, "For more than a decade, less housing has been built relative to historical averages. The housing crash decimated the home building industry and pushed many construction workers into other jobs. Local building restrictions and neighbor objections have slowed new construction. President Trump's strict immigration policies further restricted the labor supply in the industry, and his tariffs pushed up the price

⁶³ Washington Center for Real Estate Research, 2020

⁶⁴ U.S. Census Bureau, 2019

⁶⁵ This statistic describes single-race heads of household and those combined with other races. HUD defines cost-burdened households as those that pay more than 30% of their income for housing. Statewide, 23.1% of all households were cost-burdened (U.S. Census Bureau, 2019).

⁶⁶ Washington Center for Real Estate Research, 2020

⁶⁷ U.S. Census Bureau and U.S. Department of Housing and Urban Development

of building materials.⁶⁸ Meanwhile, in Washington, the state's population has grown by about 13.2% from 2010 to 2019.⁶⁹

As a result of increased population and decreased construction, median housing prices increased substantially over the past decade (see Figure 18).⁷⁰ The counties with the three highest median home resale prices, according to the most recently available data (in the third quarter of 2020), were San Juan County (\$775,000), King County (\$747,200), and Snohomish County (\$564,300) (Washington Center for Real Estate Research, 2020).⁷¹ Overall, home prices increased by 13% from 2019 to 2020, which was buoyed by low interest rates, a decreased rate of housing starts, and a reduction in building permits issued in recent months due to the COVID-19 pandemic (see Figure 19 below).⁷²

The Housing Affordability Index (HAI) is a measure of housing affordability that measures whether a median-income household can afford a mortgage loan on a median-priced home. Values lower than 100 indicate that housing is not affordable relative to income, while values above 100 indicate that median monthly housing costs are affordable relative to median income. The Washington Center for Real Estate Research provides quarterly reports of median home sales, and the most recent data indicate a statewide Housing Affordability Index (HAI) of 108.9, signaling that the median home in Washington is affordable for households making the statewide median income.

However, median American Indian/Alaska Native households and Native Hawaiian and Pacific Islander households earn substantially lower incomes than the overall median household in Washington and are less likely to be able to afford homes. Recalculating the HAI using median AIAN income yields an HAI of 67.1, indicating that the median home price is far higher than the median AIAN household income can afford. For Native Hawaiian and Pacific Islander Households, the HAI is 95.4, which appears to indicate homes are closer to being affordable for that population, but HAI varies substantially by county, and NHPs live in more urbanized areas that tend to have higher prices.

In a majority of counties in Washington (25 out of 36 for which information is available), researchers found that the median home is not affordable for the median income AIAN household. For AIAN-alone-headed households, Jefferson County has the lowest HAI of 27.3; King County is next-lowest at 43.8, and San Juan is third lowest at 45. In total, 25 counties have an HAI for AIANs of below 100. Four counties have AIAN populations that are small enough that the Census Bureau is not allowed to provide median household income information due to data disclosure rules. Median-priced homes are unaffordable to median income Native Hawaiian and Pacific Islander households in a majority of counties in Washington as well. For households headed by a single-race Native Hawaiian or Pacific Islander, Whatcom County has the lowest HAI of 56.7; King County is the next lowest at 63.1, and Skagit County is third lowest at 64.5. Overall, 11 out of 18 counties with available data had an HAI under 100 for Native Hawaiian, and Pacific Islander alone headed households (see figures 20 and 21 below).

⁶⁸ Badger, 2021

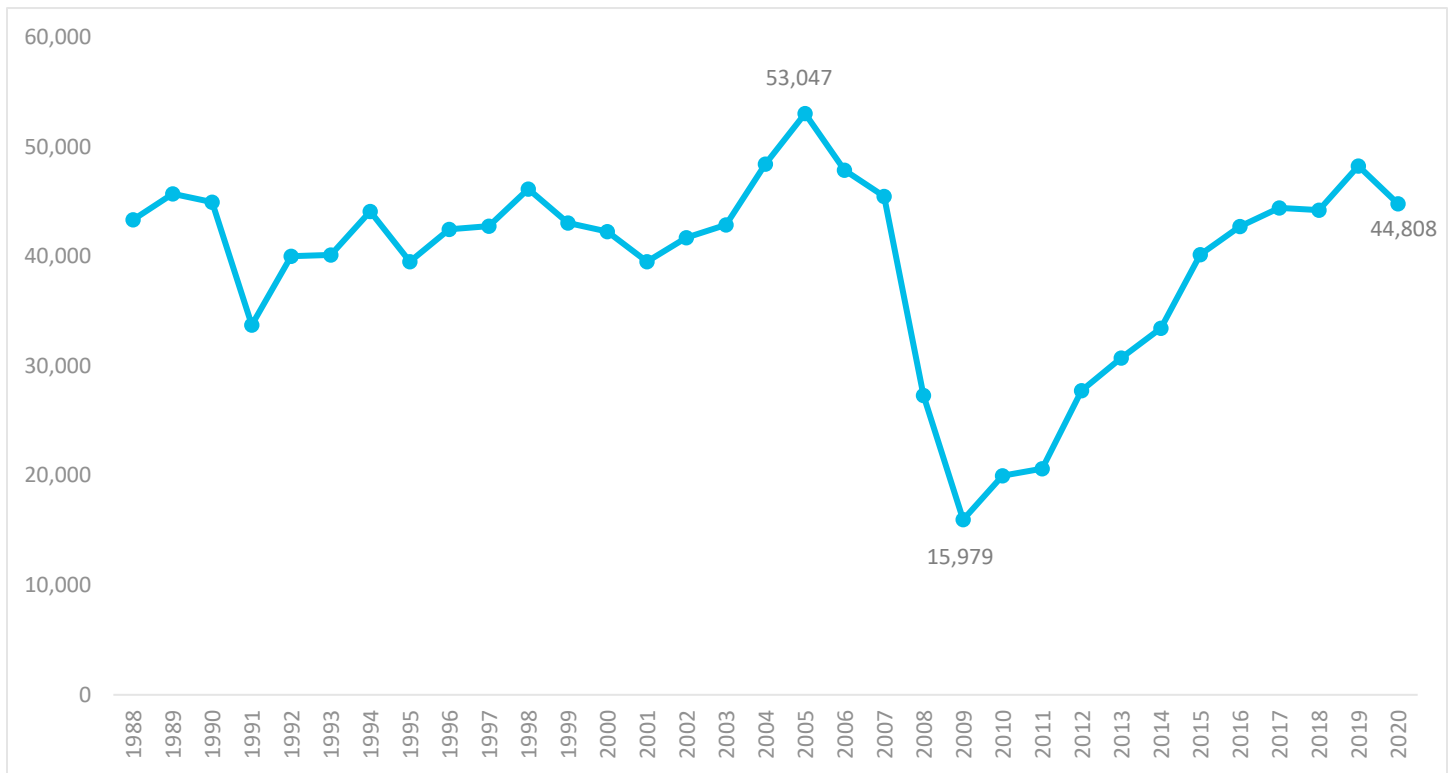
⁶⁹ U.S. Census Bureau, 2019

⁷⁰ Washington Office of Financial Management, 2020

⁷¹ Ibid.

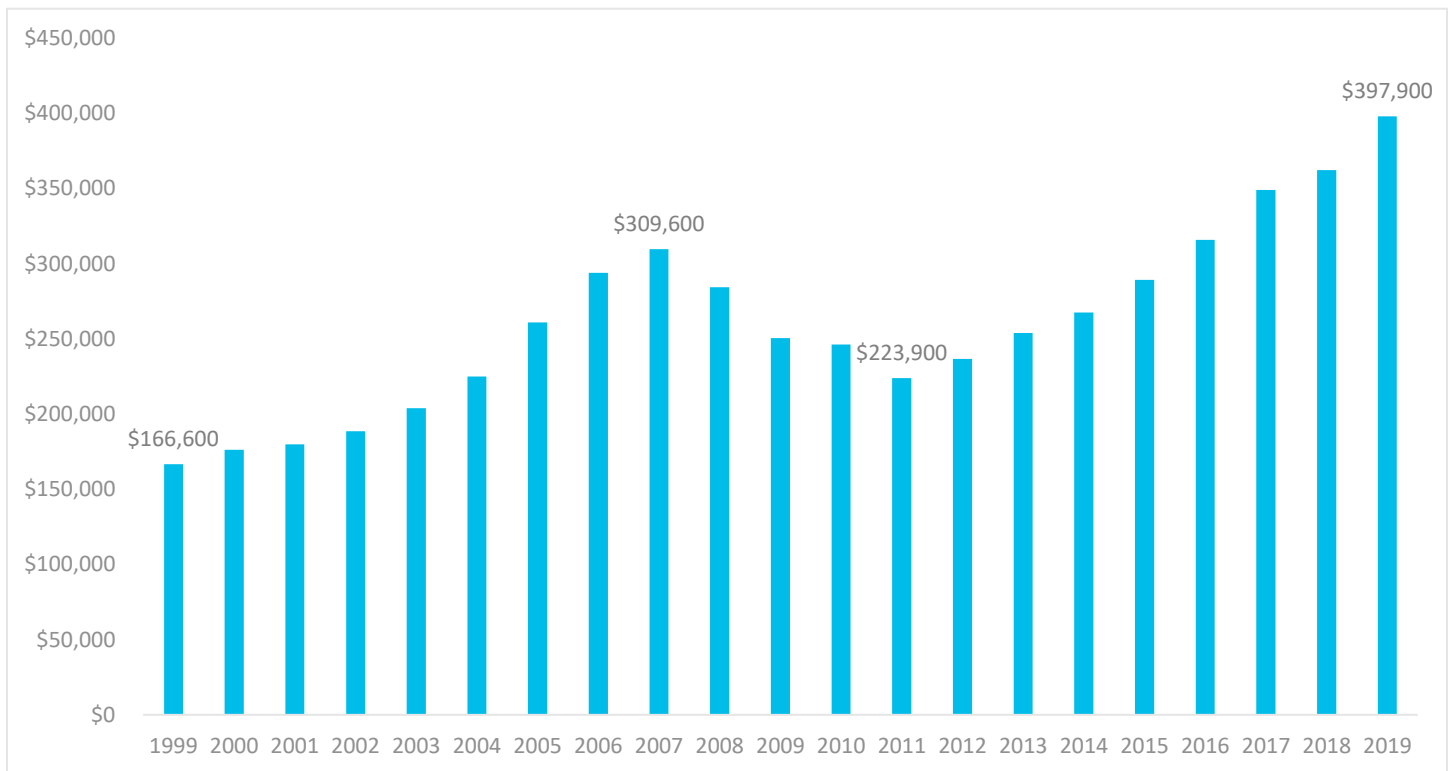
⁷² Washington Center for Real Estate Research, 2020

Figure 17: New private housing unit building permits, 1988-2020



Data source: U.S. Census Bureau, New Private Housing Units Authorized by Building Permits, retrieved from FRED, Federal Reserve Bank of St. Louis

Figure 18: Washington median home price



Data source: Office of Financial Management, Median Home Price in Washington 1999-2019

Figure 19: Median home price, third quarter, 2020

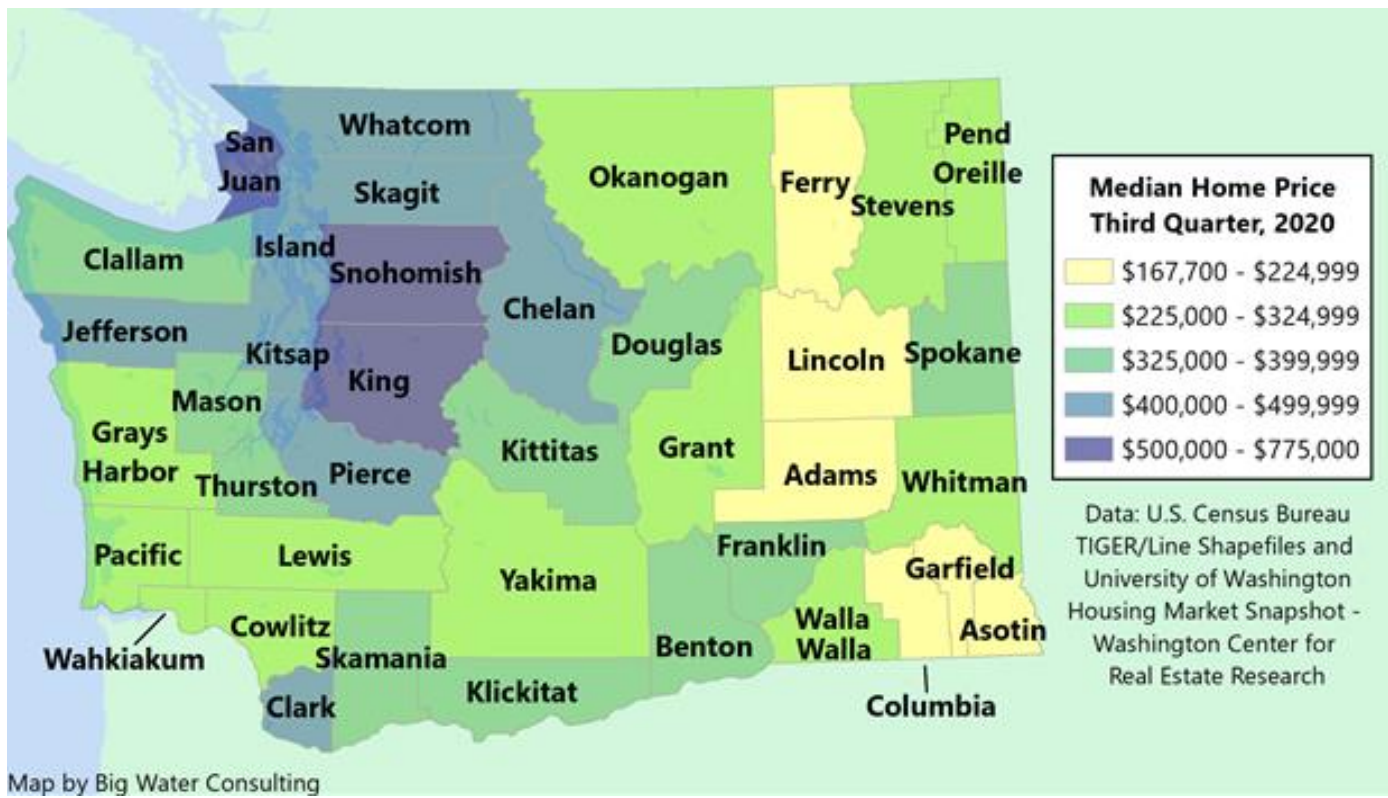


Figure 20: HAI for American Indian and Alaska Native alone headed households



Figure 21: HAI for Native Hawaiian and Pacific Islander alone headed households



Mortgage data

Available Home Mortgage Disclosure Act (HMDA) data indicates that mortgage lending to American Indian/Alaska Native and Native Hawaiian and Pacific Islanders in Washington is disproportionately low compared to overall home mortgage activity in the state. The Home Mortgage Disclosure Act of 1975 requires that most financial institutions involved in home lending report annually on the applications they receive from borrowers seeking home loan financing (including for mortgage refinancing or home improvement, as well as for home purchase).⁷³ However, HMDA data does not include data from smaller and more rural lenders that may be more likely to work with AIAN homebuyers,⁷⁴ and more than one in five loan records in Washington in the HMDA database did not include the applicant's race. While incomplete, HMDA data from 2019 suggest that AIANs and NHPis in Washington account for a disproportionately lower rate of loan applications in Washington. They are approved for lower average loan amounts and account for a disproportionately higher rate of loan applications denied, files closed due to incompleteness, and applications withdrawn by the applicant. Consequently, they account for a disproportionately lower percentage of loans originated.

HMDA data from 2019 indicates that AIANs may apply for fewer home loans compared to what we would expect, given the size of their population in the state. AIANs in Washington accounted for just 0.59% of loan records (including all loan applications, purchases, and preapproval requests), although single-race AIAN households account for approximately 1.28% of the state's households and mixed-race AIANs account for 3.08% of the state's population.⁷⁵ Native Hawaiians and Pacific Islanders may also apply for fewer loans as a proportion of their population. Native Hawaiians and Pacific Islanders accounted for 0.49% of loan records,

⁷³ Consumer Financial Protection Bureau, 2020

⁷⁴ Ibid.

⁷⁵ HMDA Data Browser, 2019

which almost mirrors the percentage of single-race Hawaiian heads of household (0.46%), but the total population of Native Hawaiians and Pacific Islanders that is either single race or NHPI in combination with other races accounts for 1.26% of the total population.⁷⁶

AIANs and NHPIs are also more likely to apply for loans and not receive them. In Washington, about 64.7% of all 2019 loan records⁷⁷ indicate successful loan origination, while only 54.1% of AIAN and 54.5% of NHPI related loan records indicate a successful loan origination.⁷⁸ These two minority groups experience higher rates of application denials, application withdrawals by the applicant, and files closed for incompleteness. Statewide, 13.2% of loan records in 2019 indicated that the loan applicant was denied their loan request. Among AIANs, this denial rate jumped to 20.1%, and among NHPIs, 21.5% of applications were denied. AIANs and NHPIs also experienced slightly higher rates of files closed for incompleteness and applications withdrawn by the applicant (see Table 4). This suggests that traditional home loans, as well as the processes required to complete loan transactions, do not cover the home loan needs of AIANs and NHPIs and cannot adapt to their needs as well as they cover the rest of the state.

The average loan origination amount statewide in 2019 was \$353,098, while the average loan origination amount for AIAN borrowers was substantially lower at \$249,883.⁷⁹ Among Native Hawaiians and Pacific Islander borrowers, the average originated loan was \$308,671.⁸⁰ Smaller average loan sizes reflect the lower household incomes and subsequent buying power of these populations.

As previously noted, HMDA data are not a complete record of all home loans in Washington. In order to get a better sense of other loan sources and housing financing provided, project coordinators also gathered information from USDA, HUD, and the Washington State Housing Finance Commission.

⁷⁶ Ibid.

⁷⁷ Not including purchased loan records, or loans that one institution purchases from another on the secondary market for home loans.

⁷⁸ HMDA Data Browser, 2019

⁷⁹ Ibid.

⁸⁰ Loan purposes do not account for these differences in value as they did not appear to vary substantially between the three observed groups: AIANs, NHPIs, and all Washingtonians used loans for similar purposes at similar rates, with 38% using loans for home purchases, 7-8% using loans for home improvement, 22-26% using loans for refinancing, 21-22% using loans for cash out refinancing, and 7-8% using loans for "other purposes."

Table 4: 2019 Wash. home mortgage disclosure act – loan action taken by race*

Action taken	Washington total		American Indian or Alaska Native		Native Hawaiian or Other Pacific Islander	
	Records	Average loan amount	Records	Average loan amount	Records	Average loan amount
Loan originated	308,204 (64.9%)	\$353,098	1,618 (54.1%)	\$249,883	1,313 (54.5%)	\$308,671
Application denied	62,798 (13.2%)	\$237,652	600 (20.1%)	\$174,283	518 (21.5%)	\$187,008
Application approved but not accepted	10,493 (2.2%)	\$288,488	72 (2.4%)	\$220,972	58 (2.4%)	\$236,724
Application withdrawn by applicant	72,962 (15.4%)	\$354,425	514 (17.2%)	\$258,366	386 (16%)	\$300,363
File closed for incompleteness	19,408 (4.1%)	\$305,847	176 (5.9%)	\$220,114	124 (5.1%)	\$266,855
Preapproval request denied	463 (0.1%)	\$311,911	5 (0.2%)	\$141,000	4 (0.2%)	\$245,000
Preapproval request approved but not accepted	875 (0.2%)	\$386,806	4 (0.1%)	\$222,500	5 (0.2%)	\$267,000
Total	475,203	\$334,711	2,989	\$235,582	2,408	\$278,151

*Not including purchased loans or loans that one institution purchases from another on the secondary market for home loans

Housing characteristics

ACS data, responses to the 2019 American Housing Survey by AIAN and NHPI heads of household, and responses to the survey conducted in this study by the leaders of Tribal housing entities indicate that living conditions for American Indian/Alaska Native and Native Hawaiians and Pacific Islanders are more difficult or stressed than the average housing in Washington. AIANs and NHPs are more likely to live in overcrowded homes, and their households are more likely to be adequate, according to ACS and AHS survey data.

Both AIANs and NHPs are more likely to rent than own their homes and are more likely to live in apartments and mobile homes than single-family homes, compared to the average household in Washington.⁸¹ AIAN

⁸¹ U.S. Census Bureau, 2019

heads of household who own a home tend to live in older homes than NHPI homeowners and the average Washington homeowner.⁸²

Overcrowding in households can lead to increased physical and mental illness as well as personal safety issues, including domestic disputes.⁸³ Transmission of illness, including bronchitis, meningococcal disease, respiratory disease, meningitis, scabies, and lice, occurs more frequently in overcrowded households and may make household occupants more susceptible to COVID-19.⁸⁴ The U.S. Department of Housing and Urban Development (HUD) defines an overcrowded household as one with more than 1.0 persons per room, while a severely overcrowded household has more than 1.5 persons per room.⁸⁵

Both AIAN and Native Hawaiian households (single-race or in combination with other races) are more likely to be overcrowded than Washington households in general. In Washington, 3.1% of all households were overcrowded (with 0.9% severely overcrowded); among AIAN households, 4.9% of households were overcrowded (with 1.6% severely overcrowded), and among NHPI households (single-race or in combination with other races), 9.8% were overcrowded (with 2.9% severely overcrowded).⁸⁶ In total, ACS PUMS estimates indicate that 3,407 AIAN households were overcrowded, of which 1,146 were severely overcrowded, and 2,290 NHPI households were overcrowded, of which 676 were severely overcrowded.⁸⁷

ACS defines a multigenerational household as a family with three or more generations living together under one roof. In Washington, recent data indicate that 3.2% of households were multigenerational, while 4.7% of AIAN households were multigenerational, and 6.2% of Native Hawaiian households were multigenerational. Families may choose to live in multigenerational homes to defray the expenses of housing and childcare or to spend more time together. However, multigenerational homes that are also overcrowded can put elders at risk of catching respiratory illnesses, including COVID-19.⁸⁸

One in five (20%) AIAN-headed households contains at least one non-relative, and 17.2% of Native Hawaiian and Pacific Islander-headed households include a non-relative, while 13.8% of households in Washington have a non-relative living with them.⁸⁹ This further underscores that AIAN and NHPI families may need to live with others to reduce housing costs, which can lead to overcrowding and doubling-up of families.

Both AIAN- and NHPI-headed households are more likely to rent than own their home.⁹⁰ While 62.4% of households in Washington own their home, only 50.2% of AIAN households and 37.1% of NHPI households own their home. Meanwhile, AIAN households that do own their home tend to own slightly older homes in comparison to the statewide average, with 55.3% of owned homes built prior to 1980, compared to the statewide average of 48.5% of homes built prior to 1980 (among owned single-family attached and detached homes and mobile homes). Native Hawaiian and Pacific Islander-headed households own more newly built homes, and this may be because they are more likely to live in more urban areas with more recently developed housing, as shown in Table 5.⁹¹

⁸² Ibid.

⁸³ *Econometrica*, 2007

⁸⁴ Kunkle, 2020

⁸⁵ *Econometrica*, 2007

⁸⁶ ACS 2018 5-Year PUMS

⁸⁷ Ibid.

⁸⁸ Varshney & Adalbert, 2021

⁸⁹ ACS 2018 5-Year PUMS

⁹⁰ U.S. Census Bureau, 2019

⁹¹ U.S. Census Bureau, 2019

In Washington, AIAN-headed households are more likely to live in a mobile home or trailer (9.3%) or apartment complexes with at least two units (28.4%) than non-AIAN-headed Washington households.⁹² Native Hawaiian and Pacific Islanders are much more likely to live in apartment buildings with at least two units (42.4%) but are less likely to live in mobile homes. American Indian/Alaska Natives and NHPIs tend to be more likely to rent their homes, and AIANs tend to live in older homes compared to statewide averages (see tables 6 and 7).

American Indian/Alaska Native households are less likely to have access to the internet than the average Washington household.⁹³ In Washington, 17.2% of households with an AIAN head of household (alone or in combination with other races) do not have internet access, while 10.3% of Washington households have no internet access and 8.75% of households with a NHPI head of household (alone or in combination with other races) lack internet access.⁹⁴

Table 5: Tenure of household by race of head of household

Building type	All Washington households	AIAN alone or in combination with other races head of household	NHPI alone or in combination with other races head of household
Owned with mortgage or loan (include home equity loans)	1,202,046 (42.9%)	23,889 (32.5%)	6,787 (29.0%)
Owned free and clear	546,246 (19.5%)	13,047 (17.7%)	1,904 (8.1%)
Rented	1,010,978 (36.1%)	35,127 (47.8%)	14,274 (61.0%)
Occupied without payment of rent	41,158 (1.5%)	1,448 (2%)	440 (1.9%)

Source: American Community Survey, 2018 5-Year PUMS

⁹² Ibid.

⁹³ U.S. Census Bureau, 2019

⁹⁴ ACS 2018 5-Year PUMS

Table 6: Building type by race of head of household

Building type	All Washington households	AIAN alone or in combination with other races head of household	NHPI alone or in combination with other races head of household
Mobile home or trailer	195,741 (6.4%)	6,860 (9.3%)	756 (3.2%)
One-family house detached	1,942,761 (63.4%)	42,945 (58.4%)	11,446 (48.9%)
One-family house attached	117,254 (3.8%)	2,436 (3.3%)	1,206 (5.2%)
2-4 apartments	183,734 (6%)	5,895 (8%)	3,190 (13.6%)
5 or more apartments	618,477 (20.2%)	15,018 (20.4%)	6,734 (28.8%)
Boat, RV, van, etc.	6,414 (0.2%)	357 (0.5%)	73 (0.3%)

Source: American Community Survey, 2018 5-Year PUMS

Table 7: Building age of homes owned by householder by race of head of household

Building type	All Washington households	AIAN alone or in combination with other races head of household	NHPI alone or in combination with other races head of household
1939 or earlier	174,145 (10.5%)	4,598 (12.9%)	329 (4%)
1940 to 1949	89,209 (5.4%)	1,976 (5.5%)	392 (4.8%)
1950 to 1959	139,281 (8.4%)	2,972 (8.3%)	570 (7%)
1960 to 1969	153,220 (9.2%)	3,166 (8.9%)	679 (8.3%)
1970 to 1979	250,621 (15.1%)	7,029 (19.7%)	817 (10%)
1980 to 1989	203,431 (12.2%)	4,791 (13.4%)	1,350 (16.5%)
1990 to 1999	287,527 (17.3%)	5,048 (14.1%)	1,379 (16.8%)
2000 to 2009	277,638 (16.7%)	4,731 (13.2%)	1,853 (22.6%)
2010 and later	86,795 (5.2%)	1,404 (3.9%)	825 (10.1%)

Source: American Community Survey, 2018 5-Year PUMS

Survey responses from Tribally Designated Housing Entities (TDHEs) indicated that overall housing conditions on Washington reservations ranged from “poor” to “good.” While 63% of TDHEs responded that rental units were in “good” condition, 25% replied that rental unit conditions were “fair,” and 13% responded that conditions were “poor.” Meanwhile, 47% reported that homeownership units were in “good” condition, 47% reported that they were in “fair” condition, and 7% reported that they were in “poor” condition. The housing entities that reported inferior housing conditions were more likely to be located in rural or remote areas, including the Olympic Peninsula and rural Eastern Washington.

The American Housing Survey (AHS) is a nationwide survey sponsored by HUD and conducted by the Census Bureau.⁹⁵ It is the most comprehensive survey of housing conditions in the United States. Due to the AHS sample design, HUD and the Census Bureau cannot produce reliable estimates that accurately reflect the condition of housing units at the state level. Instead, AHS reliably reports information at the national level and for Metropolitan Statistical Areas, including the Seattle-Tacoma-Bellevue Metropolitan Statistical Area (Seattle MSA). The Seattle MSA includes King, Pierce, and Snohomish counties and encompasses more than half of the state’s overall population, 42% of the state’s AIAN population, and 66% of the state’s NHPI population.⁹⁶ However, due to the small sample size of AIANs and NHPIs, the AHS cannot report the aggregated responses for every factor at the MSA level. Very little information regarding the quality of housing occupied by NHPI households is available even at the nationwide level.⁹⁷ Because of these shortcomings, this report presents both U.S.-level and Seattle MSA-level housing conditions reported by the AHS.

The AHS defines “adequate” housing as housing that meets the standard established by the Housing Act of 1949 of “a decent home and a suitable living environment.”⁹⁸ Inadequate homes have identified issues or problems, including issues with heat, plumbing, electricity, exposed wiring, water leaks, holes, cracks, or pest infestations.⁹⁹ In 2019, 97.2% of the housing in the Seattle MSA was rated as adequate.¹⁰⁰ In the Seattle MSA, 89.1% of AIAN-headed households lived in adequate housing, and 94.9% of Native Hawaiians lived in adequate housing. This echoes nationwide findings, which reported 95% of homes in the U.S. were adequate, while fewer AIAN (91.8%) and NHPI (91.6%) homes were rated as “adequate.”¹⁰¹

AIAN-headed households were disproportionately found to be inadequate, largely due to issues related to electricity, water leaks and heat. American Indian/Alaska Native-headed households in the Seattle MSA were more likely than other households to have a blown fuse in the three months prior to being surveyed, at 14.1% of AIAN-headed households vs. 10% of all households.¹⁰² AIAN-headed households were more than twice as likely to experience water leaks inside the structure within the 12 months prior to being surveyed (19% vs. 7.3%) and more likely to experience water leaks coming in from outside the structure (6.5% vs. 4.9%).¹⁰³

The AHS identified severe inequities in heating: While 84.4% of all homes in the Seattle MSA did not experience uncomfortable cold for more than 24 hours at some point in the past year, 65.8% of AIAN households (and 89% of NHPI households) did not experience a 24-hour period of uncomfortable cold.¹⁰⁴ Meanwhile, in the Seattle MSA overall, 26.4% of homes were uncomfortably cold due to an equipment breakdown, but almost three-

⁹⁵ U.S. Census Bureau, 2021

⁹⁶ U.S. Census Bureau, 2019

⁹⁷ U.S. Census Bureau, 2021

⁹⁸ Ibid.

⁹⁹ Eggers & Moumen, 2013

¹⁰⁰ Ibid.

¹⁰¹ Ibid.

¹⁰² Ibid.

¹⁰³ Ibid.

¹⁰⁴ Ibid.

quarters were cold due to other unattributed reasons, which could suggest that many homes were cold due to a utility interruption, the cost of heating, inadequate heating capacity, inadequate insulation or other issues.¹⁰⁵ National-level trends show about 86.2% of households overall did not experience uncomfortable cold for more than 24 hours, while 80.2% of AIAN households and 76.6% of NHPI households did not experience uncomfortable cold.¹⁰⁶

According to the U.S. Department of Health and Human Services (HHS), only 9% of estimated income-eligible households in Washington were served by heating or energy assistance (such as the Low Income Home Energy Assistance Program, or LIHEAP) in 2019.¹⁰⁷ Given the disproportionately high number of uncomfortably cold AIAN and NHPI households and the comparatively lower median incomes, it is possible that many of these households may be eligible for heating and energy assistance from LIHEAP that they may not be receiving, or that the heating stipends provided are not enough to comfortably heat homes.¹⁰⁸

While complete AHS data are not available at the Seattle MSA level due to the small sample size, AIAN households in the U.S. were more likely to have a number of issues compared with nationwide averages. This includes issues with mice or rats (16.1% vs. 11.9%), holes in floors (3.8% vs. 1.2%), open cracks or holes on the interior (9.6% vs. 5.4%), exposed wiring (3.5% vs. 2.7%), rooms without electric outlets (3.6% vs. 1.9%), cracking or crumbling foundations (5.1% vs. 3.8%), broken windows (5.7% vs. 2.9%), and mold (5.9% vs. 3.8%).¹⁰⁹ AIANs were almost twice as likely as the average U.S. household to live in homes with broken windows (5.7% vs. 2.9%) and more likely to report living in homes with cracking or crumbling foundations (5.1% vs. 3.8%).¹¹⁰

Tribal land and service area data

ACS 5-Year estimates show worse overall housing conditions on reservation lands in comparison to Washington as a whole. There are a total of 75,851 houses within Washington Tribal lands.¹¹¹ Overall, there are a higher proportion of vacant units in comparison to the U.S. and Washington (see table 8).¹¹² Homeownership rates are higher in Tribal areas than non-Tribal areas, but fewer units that are owned in these areas have a mortgage compared to Washington and the U.S. overall (see tables 9 and 10). The types of housing structures in Tribal lands are different compared to non-Tribal lands, and a large portion of homes are single-family, detached structures, while there are far fewer apartment buildings and a higher prevalence of mobile homes in comparison to both the U.S. and Washington (see Table 11).

¹⁰⁵ Ibid.

¹⁰⁶ U.S. Census Bureau, 2019

¹⁰⁷ LIHEAP Performance Management, 2019

¹⁰⁸ LIHEAP Performance Management, 2019

¹⁰⁹ U.S. Census Bureau, 2019

¹¹⁰ Ibid.

¹¹¹ Ibid.

¹¹² Higher vacancy rates do not suggest that all vacant homes are habitable, and in fact, only 4.5% of vacant homes in Tribal lands are available for rent, and 5.1% of vacant homes are for sale, per ACS 2019 data.

Table 8: Occupancy

Occupancy	U.S.	Washington	U.S. Tribal areas	Wash. Tribal areas
Housing units	137,428,986	3,106,528	2,206,653	75,851
Occupied units	87.9%	91.6%	82.4%	83.4%
Vacant units	12.1%	8.3%	17.6%	15.9%

Source: American Community Survey, 2019 5-Year Estimates

Table 9: Housing tenure

Housing tenure	U.S.	Washington	U.S. Tribal areas	Wash. Tribal areas
Owner-occupied	64.0%	62.9%	67.6%	67.6%
Renter-occupied	36.0%	37.1%	32.4%	32.4%

Source: American Community Survey, 2019 5-Year Estimates

Table 10: Mortgage status of owned units

Mortgage status	U.S.	Washington	U.S. Tribal areas	Wash. Tribal areas
Housing units without a mortgage	36.9%	31.3%	49.6%	41.4%
Housing units with a mortgage	63.1%	68.7%	50.4%	58.9%

Source: American Community Survey, 2019 5-Year Estimates

Table 11: Units in structure

Units in structure	U.S.	Washington	U.S. Tribal areas	Wash. Tribal areas
1 unit detached	61.6%	63.1%	71.5%	76.0%
1 unit attached	5.9%	4.0%	2.0%	2.5%
2 units	3.6%	2.3%	2.2%	2.3%
3 or 4 units	4.4%	3.5%	2.6%	2.5%
5 to 9 units	4.7%	4.5%	2.9%	3.4%
10 to 19 units	4.4%	5.0%	2.4%	2.5%
20 to 49 units	3.7%	4.5%	1.5%	1.1%
50 or more units	5.5%	6.5%	1.2%	0.8%
Mobile home	6.2%	6.2%	13.5%	8.6%
Boat, RV, van, etc.	0.1%	0.2%	0.2%	0.4%

Source: American Community Survey, 2019 5-Year Estimates

Homes within Tribal lands in Washington are more likely to lack essential features and experience overcrowding than average Washington homes. In Washington, 2.3% of homes in Tribal lands lack complete kitchen facilities, while a slightly lower percentage (1.8%) of Washington homes lack complete kitchen facilities (see Table 12).¹¹³ Additionally, while 3.4% of homes in the state are overcrowded, 5.1% of homes on Tribal lands in Washington are overcrowded¹¹⁴ (see Table 13).¹¹⁵ Approximately 48% of those living in Tribal areas in Washington are rent-burdened (pay more than 30% of income on rent), and 21% are severely rent-burdened (pay more than 50% of income on rent).¹¹⁶ This is a problem throughout Washington and the U.S., as rent increases have outpaced income growth.

¹¹³ U.S. Census Bureau, 2019

¹¹⁴ The U.S. Census defines an overcrowded unit as one occupied by 1.01 persons or more per room (excluding bathrooms and kitchens).

¹¹⁵ U.S. Census Bureau, 2019

¹¹⁶ U.S. Census Bureau, 2019

Table 12: Facilities and services

Facilities and services	U.S.	Wash.	U.S. Tribal areas	Wash. Tribal areas
Lacking complete plumbing facilities	0.2%	0.2%	0.8%	0.3%
Lacking complete kitchen facilities	2.8%	1.8%	5.8%	2.3%
No telephone service available	0.7%	0.6%	1.1%	0.8%

Source: American Community Survey, 2019 5-Year Estimates

Table 13: Occupants per room

Occupants per room	U.S.	Wash.	U.S. Tribal areas	Wash. Tribal areas
0.50 or less	70.8%	69.8%	69.3%	67.5%
0.51 to 1.00	25.8%	26.8%	26.7%	27.4%
1.01 to 1.50	2.3%	2.2%	2.7%	3.7%
1.51 to 2.00	0.8%	0.9%	0.9%	1.1%
2.01 or more	0.3%	0.2%	0.4%	0.3%
Overcrowded (1.01+)	3.3%	3.4%	4.0%	5.1%

Source: American Community Survey, 2019 5-Year Estimates

According to 2021 estimates by the Indian Housing Block Grant (IHBG) program, there are 110,243 AIAN persons living in areas served by Tribally-designated housing entities in Washington.¹¹⁷ This includes AIAN persons living on reservation lands, off-reservation trust lands, and within near-reservation service areas. In these areas, there is a total of 19,851 AIAN households with a household income below 80% of the area median income (AMI), 2,695 AIAN households experiencing overcrowding or that had an incomplete kitchen or plumbing system, and 6,364 AIAN households that were severely rent-burdened (see Table 14).¹¹⁸

¹¹⁷ U.S. Department of Housing and Urban Development, 2020

¹¹⁸ Ibid.

Table 14: IHBG estimates

HUD IHBG estimates	Wash.	NwONAP
AIAN persons	110,243	162,916
AIAN households with less than 30% of median family income	7,523	10,861
AIAN households between 30% and 50% of median family income	5,740	8,706
AIAN households between 50% and 80% of median family income	6,598	9,977
AIAN households with more than one person per room or without kitchen or plumbing	2,695	4,154
AIAN households with housing expenses greater than 50% of income	6,384	9,637
Number of AIAN households with less than 80% of median family income - FCAS	18,282	27,221

Source: 2021 IHBG Estimates, HUD

Funding programs for housing

USDA

The U.S. Department of Agriculture (USDA) Rural Development’s housing loan and grant programs assist eligible applicants in developing, repairing and purchasing homes in rural areas.¹¹⁹ Eligible applicants include potential homeowners that meet income and credit eligibility criteria and housing developers that provide affordable rental opportunities for eligible tenants in eligible rural areas.¹²⁰ USDA Rural Development staff provided the research team with historical obligation reports describing investments guaranteed by USDA Rural Development throughout Washington in fiscal years 2018-2020.

The USDA Section 502 Guaranteed Loan Program assists approved lenders in providing low- and moderate-income households the opportunity to own adequate, modest, decent, safe and sanitary dwellings as their primary residence in eligible rural areas.¹²¹ Applicants can use the loan to purchase, build, rehabilitate, improve, or relocate a home in qualified rural areas. The homebuyers using this loan are not required to make a down payment, and 90% of the loan note is guaranteed to protect lenders from loss.¹²² In Washington, as of June 2016, there were 18,624 active borrowers for this program, of whom 180 were AIAN (0.9% of borrowers) and 163 were NHPI (0.8% of borrowers).¹²³ In fiscal years 2018-2020, USDA guaranteed 125 Section 502 Guaranteed Loans to AIAN persons in Washington for a combined loan amount of \$22.7 million.¹²⁴

The USDA Section 502 Direct Loan Program helps low- and very low-income applicants acquire housing in qualified rural areas by providing low-interest, long-term loans that can be coupled with payment assistance (an interest subsidy) to increase an applicant’s homeownership opportunities in rural areas. Borrowers can

¹¹⁹ U.S. Department of Agriculture, 2021

¹²⁰ For a map of eligible areas, see: <https://eligibility.sc.egov.usda.gov/eligibility/welcomeAction.do?pageAction=sfp>

¹²¹ U.S. Department of Agriculture, 2021

¹²² Ibid.

¹²³ U.S. Department of Agriculture, 2020

¹²⁴ Ibid.

also receive an interest subsidy to reduce the fixed interest rate of the loan down to rates as low as 1%, reducing the monthly mortgage payments. The amount of payment assistance is determined by family income and can fluctuate as household income goes up or down. In Washington, as of July 2016, there were a total of 3,551 active borrowers for this program, 83 are AIAN (2% of borrowers), and 27 are Hawaiian or Pacific Islander (0.7% of borrowers).¹²⁵ In fiscal years 2018-2020, USDA made 16 Section 502 Direct Loans to AIAN borrowers throughout Washington for a combined loan amount of \$2.8 million.¹²⁶

The USDA Multi-Family Housing Direct Loan (Section 515) and Farm Labor Housing Loan and Grant (Section 514/516) programs help developers (including Tribes and Tribal housing authorities) build and maintain multi-family housing projects in rural areas.¹²⁷ The Section 514/516 programs provide financial assistance to eligible developers of rental housing for farmworkers, while the Section 515 program loans money to developers of rental housing for the elderly and low-income tenants.¹²⁸ Due to budget constraints, the 515 program has been limited to providing loans for repairs and upkeep of existing 515 projects with no funding remaining for new construction over the last several years. The Multi-Family Housing Guaranteed Loan Program (Section 538) works with qualified private-sector lenders to provide financing to qualified borrowers to increase the supply of affordable rental housing for low- and moderate-income individuals and families in eligible rural areas. The program provides a 90% guarantee to private lenders that finance the building or the preservation of affordable rural rental housing.¹²⁹ Together, as of June 2017, the Section 515, 514, and 516 programs provided housing for 14,820 tenants in Washington, 166 of whom are AIAN (1.1% of tenants) and 140 of whom are NHPI (0.9% of tenants).¹³⁰

The USDA Section 504 Home Repair program provides loans to repair, improve, or modernize homes for very-low-income homeowners and grants to very-low-income elderly homeowners in order to remove a home's health and safety hazards. In fiscal years 2018-2020, USDA provided 10 Section 504 Home Repair Grants to AIAN households in Washington for a total of \$29,805.¹³¹

HUD

Indian Housing Block Grant

The Indian Housing Block Grant (IHBG) is the annual grant received by eligible Tribal recipients pursuant to the Native American Housing Assistance and Self Determination Act of 1996 (NAHASDA).¹³² IHBG funds are appropriated by Congress, and funding is allocated according to a formula, which uses the following four primary components: Need, Formula Current Assisted Stock, 1996 minimum funding level, and undisbursed IHBG funds. The Need component is determined based on decennial census numbers of American Indian/Alaska Native population and ACS estimates of household income, housing expense burden and housing conditions within Tribal formula areas. The Formula Current Assisted Stock component provides a subsidy for the ongoing operation of housing developed under the housing program that preceded NAHASDA, the United States Housing Act of 1937, while the 1996 Minimum ensures that TDHEs receive a minimum level of funding that is not less than they received in the final year of the prior program, and Undisbursed IHBG funds

¹²⁵ U.S. Department of Agriculture, 2020

¹²⁶ Ibid.

¹²⁷ U.S. Department of Agriculture, 2021

¹²⁸ U.S. Department of Agriculture, 2021

¹²⁹ Ibid.

¹³⁰ U.S. Department of Agriculture, 2020

¹³¹ Ibid.

¹³² U.S. Department of Housing and Urban Development, 1996

is an additional adjustment for IHBG funds that were undisbursed from prior allocations.¹³³ In fiscal year 2020, Tribes in Washington received a total of just over \$40 million in IHBG funding.¹³⁴ Additional block grant funding was given to Tribes through a separate IHBG-CARES allocation as part of the overall Coronavirus Aid, Relief, and Economic Security (CARES) Act funding package. IHBG-CARES funding was also allocated using the IHBG formula, and each Tribe received a little less than an additional one-third of their annual IHBG allocation through the relief package.¹³⁵

The IHBG Competitive grant distributes additional grant funding to eligible IHBG recipients in order to fund low-income Indian housing projects. In fiscal year 2019, HUD awarded 52 TDHEs a total of \$200 million through the competitive grant program, which represented two funding cycles of the IHBG Competitive grant.¹³⁶ Of the 52 grants awarded, five grants were awarded to Washington Tribes for a total of \$17.4 million.¹³⁷

Indian Community Development Block Grant

The Indian Community Development Block Grant (ICDBG) program provides direct grants for use in developing housing, community facilities, and economic development projects aimed at serving low- to moderate-income persons.¹³⁸ The grants are divided into two categories: Single-Purpose and Imminent Threat. Single-Purpose grants are competitive, while Imminent Threat grants are allocated on a first-come, first-served basis in order to alleviate acute public health or safety issues.¹³⁹ In fiscal years 2019-2020, six Washington Tribes were awarded ICDBG Single-Purpose awards for a total of \$4.2 million.¹⁴⁰ Nationwide, the ICDBG program funded 111 projects for a total of \$120 million.¹⁴¹ The Imminent Threat grants were heavily utilized by Tribes in the wake of the COVID-19 pandemic in order to house vulnerable populations and to fund other projects meant to reduce disease transmission in Tribal communities.¹⁴² In fiscal year 2020, eight Washington Tribes received Imminent Threat grant awards totaling \$7.6 million.¹⁴³ In total, \$100 million in Imminent Threat grants were provided for by the CARES Act and allocated nationwide.¹⁴⁴

Section 184 Indian Home Loan Guarantee Program

The Section 184 loan guarantee program is a home mortgage product specifically designed for Native homeownership, and this program can be used by individuals or by Tribes or TDHEs (U.S. Department of Housing and Urban Development, 2019). As of August of 2019, 2,257 of the 44,351 total loans guaranteed by the HUD Section 184 program were submitted by applicants located in Washington, the fifth-highest number of Section 184 loans by state (5.1% of all Section 184 Loans). More recent 2020 data received directly from HUD (HUD, 2020) shows that a total of 2,505 Section 184 loans have been completed in Washington since the program's inception in 1992. Many of these loans are on fee simple land. Of the 2,505 loans completed, 183 were for homes located on allotted land and 245 were for homes located on Tribal trust lands, with the rest located on fee simple land. For fiscal year 2020, there were a total of 245 Section 184 loans completed in Washington, with three for homes located on allotted land and four for homes located on trust land. The loans closed in the fiscal year 2020 on trust land averaged \$120,785 per loan and \$149,134 per loan on allotted land,

¹³³ U.S. Department of Housing and Urban Development, 1996

¹³⁴ U.S. Department of Housing and Urban Development, 2020

¹³⁵ *Ibid.*

¹³⁶ Department of Housing and Urban Development, 2019

¹³⁷ *Ibid.*

¹³⁸ U.S. Department of Housing and Urban Development, 2020

¹³⁹ *Ibid.*

¹⁴⁰ Office of Native American Programs, 2020

¹⁴¹ *Ibid.*

¹⁴² Office of Native American Programs, 2021

¹⁴³ U.S. Department of Housing and Urban Development, 2020

¹⁴⁴ *Ibid.*

versus an average of \$308,914 on fee simple land. This indicates that Section 184 loans were, on average, far smaller on Tribal lands than on non-Tribal lands.

HUD Section 4 Capacity Building for Community Development and Affordable Housing Program

HUD's Section 4 grant is a capacity-building training and technical assistance grant program intended to help Community Development Corporations, Community Housing Development Organizations, and TDHEs carry out affordable housing activities (HUD Exchange, 2020). The grant is administered by three national nonprofit intermediary groups. One of the three intermediary groups, Enterprise Community Partners, markets this program to TDHEs. Since 2015, Enterprise has administered four \$50,000 and one \$30,000 Section 4 grants to four Washington Tribes.¹⁴⁵

Title VI Loan Guarantee Program

The Tribal Housing Activities Title VI Loan Guarantee Program authorized by NAHASDA assists IHBG recipients in obtaining private financing for affordable housing activities, such as infrastructure, building new or rehabilitating existing housing, housing assistance and services, crime prevention and safety, land acquisition and architectural and engineering services.¹⁴⁶ The program is non-competitive and requires that the recipient leverage the Need portion of the Tribe's annual IHBG grant, with awards of up to five times the amount of the Need portion of the Tribe's IHBG allocation. Title VI financing can be used in combination with Low-Income Housing Tax Credits and allows for flexible loan structuring to meet the requirements of the project and repayment terms with the lender. Between 2005 and 2016, six Washington Tribes received eight Title VI loans for a total loan amount of \$40.7 million.¹⁴⁷ There have been no new loans guaranteed for Title VI-funded projects in Washington since 2016.

Housing Choice Vouchers

The Housing Choice Voucher Program (formerly Section 8) provides rental subsidies to low-income households renting privately-owned apartments or houses as well as apartments in subsidized housing projects.¹⁴⁸ The family or individual issued a housing choice voucher is responsible for finding a housing unit. The vouchers are administered by local public housing authorities and can be used to rent from any willing landlord. The program is not Native-specific, but Native people are eligible for the program if they meet income requirements. According to HUD data, 2% of Housing Choice Voucher recipients in Washington are AIAN.¹⁴⁹

Veterans

Native American Direct Loan Program

The Native American Direct Loan (NADL) Program is available to individual veterans who identify as Native American or to non-Native veterans who are married to a Native American (VA, 2020). The NADL loans can be used to buy, build, or improve a home on federal trust land and are obtained through private lenders. Loans for Washington residents are administered by the Denver Regional Loan Center office through the U.S. Department of Veterans Affairs (VA).

Tribal HUD-Veterans Affairs Supportive Housing (Tribal HUD-VASH) Program

The HUD-VASH program is a collaborative effort between HUD and the VA, which combines HUD rental assistance vouchers with VA supportive services to aid veterans who are experiencing homelessness or are at

¹⁴⁵ Enterprise Community Partners, 2020

¹⁴⁶ HUD, n.d.

¹⁴⁷ U.S. Department of Housing and Urban Development, 2016

¹⁴⁸ HUD, n.d.

¹⁴⁹ HUD Office of Policy Development and Research, 2020

risk of homelessness.¹⁵⁰ The Tribal HUD-VASH program was introduced in 2015 as a demonstration program that offered housing and supportive services to Native veterans.¹⁵¹ Twenty-nine TDHEs were invited to partake in the program nationwide. Three Washington TDHEs were invited to partake in the program: Colville Indian Housing Authority, Spokane Housing Authority, and Yakama Nation Housing Authority. It was recently announced that HUD will expand Tribal HUD-VASH to include new Tribes in the program (see Opportunities section for information about the expansion of the program).

Federal Home Loan Bank

Federal Home Loan Banks (FHLB) are federally chartered but privately capitalized corporations owned by financial institutions such as banks or credit unions. These financial institutions buy stock in the FHLB and engage in low-cost residential mortgage lending through various programs, including the [Affordable Housing Program](#), the [Community Investment Program](#), the [Mortgage Partnership Finance Program](#), and the [Mortgage Purchase Program](#). The Affordable Housing Program can be used by Tribes to leverage funding for Low Income Housing Tax Credit projects.

Washington State Housing Trust Fund

The Washington State Housing Trust Fund provides capital funding to help build or preserve affordable housing through competitive loans and grants.¹⁵² While the Housing Trust Fund finances housing for families below 80% of AMI, most properties financed by the program serve households below 30% of AMI. Since 1990, the Washington State Housing Trust Fund has supported 23 Native programs (22 Tribal, one urban) for a total of \$14.3 million invested in affordable Native housing.¹⁵³ These investments in Native housing represent 1.4% of the total number of investments and 1% of all funds invested.

Washington State Housing Finance Commission

The Washington State Housing Finance Commission (WSHFC) is a state agency dedicated to increasing access to affordable housing and quality community services within the state of Washington.¹⁵⁴ Many of their programs, while not Native-specific, are open to Native people, Tribes, or Native organizations. WSHFC housing programs include Low-Income Housing Tax Credit (LIHTC), Home Advantage, House Key Opportunity, HomeChoice Downpayment Assistance Loan, EnergySpark Home Loan, Capital Plus and the Land Acquisition Program.

WSHFC allocates federal income tax credits to developers through the Low-Income Housing Tax Credit (LIHTC) program. The 9% LIHTC program is allocated through a project-based annual competitive grant process to developers of affordable multifamily housing construction without federal subsidies and is intended to deliver up to a 70% subsidy.¹⁵⁵ The 4% LIHTC program is typically used for rehabilitation projects financed by tax-exempt bonds and is intended to deliver up to a 30% subsidy (WSHFC, 2020). In order for a project to qualify for the LIHTC program, the proposed development must reserve a certain number of units for low-income residents.

The tax credits are initially allocated to states by population, and then each state allocates the credits to developers using their respective housing finance agency's Qualified Allocation Plan (QAP). Priority for tax

¹⁵⁰ VA, 2020

¹⁵¹ U.S. Department of Housing and Urban Development, 2020

¹⁵² Housing Trust Fund, 2020

¹⁵³ Washington State Housing Trust Fund, 2020

¹⁵⁴ Washington State Housing Finance Commission, 2020

¹⁵⁵ Washington State Housing Finance Commission, 2020

credits goes to projects serving and remaining affordable to the lowest-income households. While LIHTC is a federal program, each state has flexibility in setting certain awardee requirements and in the development of its QAP, where a state can determine priorities based on location or subpopulation. QAP development is a process that allows for public and stakeholder input.

Developers have two years to complete a project once tax credits have been allocated, and they cannot claim the credits until the project is placed in service (for example, the building is completed and ready to be rented). Unclaimed credits are returned and put in a national pool that is redistributed to states through an application process. Developers typically sell tax credits to outside investors in exchange for equity financing for the project.

Since 2000, applications for 39 LIHTC projects have been received from 12 Washington Tribes and one inter-Tribal housing authority. These applications were almost exclusively for new housing construction using the 9% tax credit. Of the 39 projects, 11 projects were not funded: four withdrew from the program, three returned credits, and four did not specify. The 28 awarded or in-development LIHTC projects provide funding for a total of 892 low-income housing units, including 377 units for households under 30% of AMI.¹⁵⁶

- The [Home Advantage Program](#) is a low-interest rate home loan program offered by WSHFC that is available to low- to moderate-income home buyers (who earn less than \$145,000 annually) in Washington who attend a homebuyer education seminar. In 2019, WSHFC issued 6,905 Home Advantage Loans.¹⁵⁷
- The [House Key Opportunity Program](#) is a state bond program in which Washington raises money through the sale of tax-exempt bonds to investors and uses the proceeds to create below-market-rate mortgages for low- to moderate-income first-time home buyers. In 2019, WSHFC issued 957 House Key Opportunity loans.¹⁵⁸
- The [HomeChoice Downpayment Assistance Loan Program](#) is available to low- to moderate-income borrowers who have a disability or have a household member with a disability. The program can be used in combination with House Key and Home Advantage.
- The [EnergySpark Home Loan program](#) offers incentives to borrowers who buy energy-efficient homes or upgrade older homes to make them energy efficient. Borrowers who buy an energy-efficient home or make upgrades to an existing home at the time of purchase save 0.25% on their home loan's interest rate.
- [Capital Plus](#) is a program that helps nonprofit organizations access financing for loans of up to a maximum of \$750,000 with terms up to 10 years and interest rates from 4% through a partnership between WSHFC and the Washington Community Reinvestment Association. Capital Plus can be used as a source of leveraging, particularly for smaller deals.
- The [Land Acquisition Program](#) is a WSHFC loan program to help developers purchase land for affordable housing developments. The loan program is open to nonprofits, housing authorities, and Tribes.

Other funding

Native Community Development Financial Institutions (CDFIs)

Washington is home to two Native CDFIs: [Northwest Native Development Fund](#) and [Lummi CDFI](#). Both Washington Native CDFIs offer personal and small business loan products, as well as financial and technical assistance services to help Native individuals establish and build credit and general financial wellness. These

¹⁵⁶ Washington State Housing Finance Commission, 2020

¹⁵⁷ Washington State Housing Finance Commission, 2019

¹⁵⁸ Washington State Housing Finance Commission, 2019

Native CDFIs are supported by larger associations and intermediaries, such as Oweesta and Opportunity Finance Network.

Other

There are a variety of other organizations and programs offering funding or assistance and services to Tribes and Native organizations, including [Potlatch Fund](#), [ONABEN](#), [Northwest Area Foundation](#), [Na'ah Illahee Fund](#), [Philanthropy Northwest](#), and [Affiliated Tribes of Northwest Indians Economic Development Corporation](#).

Distinguishing urban Native, Alaska Native and Native Hawaiian housing issues

Urban Native communities

Native people live in every urban area throughout Washington. The Seattle metropolitan area, as the largest urban center in Washington, has an especially high population of Native people. In King County, which has the highest number of AIAN persons by county, the median income for AIAN households reported by 2019 ACS 5-year estimates was \$52,404, or 55% of the median income of King County households overall (\$94,964). Substantial income disparities exist in other urban counties in Washington, including Benton, Clark, Kitsap, Pierce, Snohomish, Spokane, and Whatcom counties.¹⁵⁹

For Native people who are members of Washington Tribes, many can receive services through their Tribe. For those who do not live close to their Tribal lands or reservations, there are some Native-specific services available in larger Washington cities, but, according to key informant interviews and focus group participants, many Native people rely on the services and housing that are also available to the general public, including public housing provided by city or county housing entities.

In Seattle, the primary organizations that provide housing or housing assistance to Native people include Chief Seattle Club, Mother Nation, Seattle Indian Health Board, and United Indians of All Tribes Foundation. In Tacoma, the primary organizations serving Native people are the Tahoma Indian Center and the Tacoma Rescue Mission, and, in Spokane, the NATIVE Project serves as the focal point for Native services. There are also numerous cultural organizations that may provide services either directly or indirectly by providing community referrals from which individuals may receive support or aid.

Native Hawaiian communities

As one of the United States' Indigenous peoples, Native Hawaiian people have a unique relationship with the federal government and have the right to lease land designated Hawaiian homelands in Hawaii. Although Congress has repeatedly acknowledged its special political and trust relationship with the Native Hawaiian community since the overthrow of the Kingdom of Hawaii more than a century ago, the federal government does not maintain a formal government-to-government relationship with the Native Hawaiian community as an organized, sovereign entity.¹⁶⁰ Consequently, Native Hawaiian communities in Washington lack centralized resources for housing.

Many urban Native housing providers in the Seattle area offer services to Native Hawaiian residents and have made a concerted effort to make their programs and services accessible and culturally appropriate for that

¹⁵⁹ U.S. Census Bureau, 2019

¹⁶⁰ 112th Congress, 2012

population. However, when it comes to housing services that provide longer-term rentals, Native Hawaiians access services through city and county resources, as would any member of the non-Native population. According to 2019 ACS data, there are an estimated 8,000 single-race Native Hawaiians in Washington. The multi-race data does not break out Native Hawaiians from the “Native Hawaiian and Other Pacific Islander” category, so it is unknown how many of the 100,352 people in Washington who identify as “Native Hawaiian and Other Pacific Islander” are specifically Native Hawaiian in combination with another race.

Alaska Native communities

Although Alaska Tribes and Native villages are recognized as federally recognized Tribes under NAHASDA, Alaska Natives experience a range of housing and service-related issues and barriers in Washington similar to those that are experienced by the Native Hawaiians. Most resources that are available to members of Alaska Tribes and villages are only available in the state of Alaska or within a Tribe’s service area. ACS data has a single “American Indian or Alaska Native” category and asks respondents to print the name of their enrolled or principal Tribe(s), which can be used to determine whether respondents are American Indian or Alaska Native. However, 14% of AIAN respondents in Washington did not print the name of their enrolled or principal Tribe(s), and the exact number of Alaska Native people in Washington is unknown. 2019 ACS (5-Year) estimates show there were 17,442 AIANs (single race or any combination of other races) in Washington who identified their Tribal grouping as Alaska Native, which represents 8.9% of those who specified their Tribal grouping in the state’s AIAN population. Among the Alaska Natives who specified their Tribal grouping, 42% were Tlingit-Haida, 22.5% were Aleut, 11% were Inupiat, 10% were Alaskan Athabascan, 7% were Yup’ik, and 7% were Tsimshian. However, some Tribal groups estimate higher numbers of members live in Washington. For example, representatives from the Tlingit and Haida Tribes estimated that they have between 5,000-6,000 members in Seattle and 8,000-10,000 in Washington.

Highlighted housing issues

The following is a brief list and summary of several unique issues faced by Native communities in Washington. A more detailed description of these issues is included in the appendices to this report as [Appendix B](#).

Federal recognition of Tribal governments

Official recognition of sovereign Tribal nations by the U.S. federal government enables them to engage with the federal government on a government-to-government basis and access federal funding designated for Tribes and Tribal programs, and to benefit from the federal government’s trust responsibility to Tribal governments and Tribal members. This relationship enables Tribes to, for example, put land into trust for the purpose of forming or expanding their reservations. Tribes that seek and receive recognition do not have trust lands or reservations or existing stocks of federally funded housing when they are recognized and receive funding based on a defined service area rather than the boundaries of their Tribal lands. Several Tribes in Washington received recognition in the past 25 years, and at least three others are currently pursuing recognition.¹⁶¹ The Duwamish, Chinook, Kikiallus, Marietta Band of Nooksack, Snohomish, Snoqualmoo, and Steilacoom Tribes/Nations are examples of tribes that are not federally recognized and consequently are not eligible for the federal housing funding that recognized Tribes receive through HUD and other federal agencies. These tribes are not able to operate casinos or take advantage of the other rights and benefits derived from sovereign nation status. In deference to the federal government, [the Revised Code of Washington](#) also defines “Indian Tribe” as any federally recognized Tribe.¹⁶² Some non-federally recognized tribes, including the Duwamish

¹⁶¹ O’Neill, 2021

¹⁶² Washington State Legislature, n.d.

Tribe, provide services to their members by becoming registered as 501(c)3 nonprofits in order to be able to apply for grants and receive charitable donations in a manner similar to the structure and approach of urban Native organizations.¹⁶³

Relocation of coastal Tribal communities

A few Tribes in Washington have reservation lands located in areas designated as tsunami, flood and earthquake zones along the Pacific Coast, placing their communities in a perpetual state of jeopardy. In recent years, these Tribes have successfully advocated for and embarked upon the relocation of their communities to higher ground.¹⁶⁴

Point-in-Time Count of Homeless Persons

The HUD Point-in-Time (PIT) Count of Homeless Persons is conducted each year in January and is in part used to allocate funding to Continuum of Care organizations that provide services to homeless persons. Many urban Native housing providers have highlighted that these counts, which are coordinated by non-Native entities, often fail to fully and accurately count members of the Native community.¹⁶⁵ Many Tribes are either not invited to or simply do not participate in the counts for the counties in which their lands and members are located.

Compensation for the dam-related displacement of Tribal communities: Columbia River Tribes and Army Corps of Engineers

Dams constructed on the Columbia River in the 1950s flooded traditional Tribal fishing sites, including Celilo Falls, and a large number of the homes of Tribal members from four Tribes in Washington and Oregon. Full compensation of Tribal members for this displacement was not provided by the Army Corps of Engineers for over 60 years, but funding for this effort was approved by Congress, and the Corps is currently engaging in a housing and community design process with the stakeholder Tribes.¹⁶⁶

¹⁶³ Duwamish Tribe, 2020

¹⁶⁴ Dodge J. , 2011

¹⁶⁵ Davila, 2018

¹⁶⁶ Harbarger, 2016

Methodology

To assess the housing needs of Native communities in Washington, study coordinators used a combination of original or primary data collection and analysis of existing data. Original data collection was conducted via surveys containing quantitative and qualitative data questions, focus groups, and key informant interviews. Existing data analysis was conducted using data from the American Community Survey (ACS); Point-in-Time (PIT) Counts of homeless persons; Annual Performance Review (APR), and Indian Housing Plan (IHP) documents prepared by Tribal housing entities and obtained from HUD through a Freedom of Information Act (FOIA) request; publicly available data on grant and funding recipients from federal, state, and local sources; planning documents at the county, city, and Tribal level; and other publicly available data assessing economic and housing markets.

A more detailed description of each of the specific activities conducted as part of the overall methodology for this project, including the process of inviting and engaging project stakeholders and the division of stakeholders into groups for purposes of conducting focus groups and interviews, is included in [Appendix C](#).

Limitations of data and study

As the name of the project implies, the Assessment of the Housing Needs of American Indians, Alaska Natives, and Native Hawaiians in Washington sought to collect and analyze information from three distinct groups. COVID-19 placed a burden on Tribes and Tribally Designated Housing Entities (TDHEs) that limited their engagement and this study's ability to collect data. Additionally, available federal and state data suffer from several issues, including:

- A lack of standardization in collecting race, ethnicity, and Tribal affiliation data
- Sources that group American Indians, Alaska Natives, and Native Hawaiians with "other" groups
- Small populations of these groups relative to the population that can limit reporting data at desired geographies
- Processes that have resulted in Census undercount of minority groups
- Home sales loan regulations that do not capture all loans to AIANs

This study launched in January 2020, before the COVID-19 pandemic. The pandemic affected the study significantly, disrupting all in-person events and gatherings, which were a small but important piece of the project. Focus groups, interviews, and presentations were intended to occur in conjunction with existing conferences and gatherings of the Washington Native Tribal community, including seasonal meetings of Northwest Indian Housing Association (NWIHA), the annual convention of the National American Indian Housing Council (NAIHC), and a seasonal conference with the Affiliated Tribes of Northwest Indians (ATNI). Focus groups, interviews, and meetings instead took place using an online platform, but participation in these activities was more limited than planned because of the pandemic. The stakeholder group for the study consisted of many direct and indirect service providers whose priority was to meet the suddenly acute and increased needs of their constituents.

The pandemic was particularly difficult for Native populations in Washington. Urban providers in Seattle and elsewhere were overwhelmed with the task of housing vulnerable Native community members in the midst of an already-existing homelessness crisis and subsequent city-led encampment sweeps. At the same time, TDHE employees scrambled to find stable housing for vulnerable and/or elder populations, worked to distribute the Coronavirus Aid, Relief, and Economic Security (CARES) Act funding amidst office closures and higher levels of unemployment, and tried to address acute addiction and mental health issues at a time when direct contact was limited and group support gatherings were not possible. Many housing providers ceased in-

home visits, while others attempted to have visits through tenants' windows or found creative ways to create meaningful yet socially distanced contact with tenants or clients. A number of members of the stakeholder group had to abdicate or scale back their project roles in order to be more available to their client base.

The survey design was a formidable task, as Tribes and Native communities are unique and vary widely in size, population, legal status and rights, amount of need, funding opportunities, and geographies. Creating a single survey that would capture housing needs and barriers across all of these variables proved to be difficult. Survey instructions informed respondents that there would be questions that did not pertain to their organization or entity and/or to write "not applicable," but some respondents still found the questions confusing.

For example, the housing provider survey asked many questions that would only be relevant to Tribes, and some urban Native housing providers had trouble answering these questions. Even for Tribal housing entities, differences in size and governance structure led to difficulties in creating inclusive and appropriate survey questions. Some Tribes have housing departments nested within their Tribal governance structure, while other Tribes have chartered housing entities that are separate from the Tribe. These structural differences are a difficult hurdle to overcome when trying to compile a single data set for all Native communities in the state. Similar issues were faced in creating the advisory group survey, as each member interacts with Tribes, housing departments, or housing nonprofit organizations in distinct and varied ways. A lender has a very different role to play in housing development than a transitional housing consultant, and compiling a single survey that captures all of the varied experiences and expertise of the advisory group members was a difficult task.

The data collected is illustrative of overall housing need and readily supports the themes that emerged in focus groups and interviews regarding important housing needs and barriers to filling those needs. However, one of the aims of this survey effort was to compile a complete statewide data set, which does not exist anywhere else. The numbers vitally important to the utility of that data set, such as the total number of families on waiting lists for Tribal housing across the state or the total number of managed Tribal housing units from all funding mechanisms statewide, could not be compiled completely. The reasons why are many; Housing authorities are already overburdened and frequently have only one or two staff members. The COVID-19 pandemic added stress to an already over-taxed system, and housing authority staff did not have time to dedicate time to this effort. Additionally, the structure of funding for Native housing inherently discourages collaboration and instead encourages focus on one's own Tribe and housing department. As noted by a few long-standing housing authority staff members, many housing authority staff have spent their whole careers advocating for more and better funding and representation and may see a limited benefit in putting effort towards qualifying or quantifying need if the path to meeting or addressing it is not defined or certain.

Administrative data provided to HUD by Indian Housing Block Grant (IHBG) grantees, as well as publicly available datasets, were included as part of this study. This information supplemented the survey data but had its own limitations. A Freedom of Information Act (FOIA) request was submitted to HUD in order to collect and analyze Indian Housing Plans (IHPs) and Annual Performance Reports (APRs) from all of the Washington Tribes, but five Tribes had not submitted up-to-date 2019 APR submissions and APR paperwork from 2018 had to be used for those Tribes. One Tribe's APR only contained the cover page and had no data. In addition, IHPs and APRs only address HUD-funded housing and programs, which does not cover the full scope of housing, services, and programs provided by Tribes and Tribal housing entities. In fact, when comparing the total number of units listed in the APR versus the total number of units reported on the survey, the numbers differed in every case.

American Community Survey (ACS) and decennial census data were used to describe Native populations in Washington and to assess housing needs in this study. However, these data sources don't paint an accurate or complete picture of Native housing needs. The U.S. Census Bureau conducts a national household survey, known as the decennial census, every 10 years. Short-form information is collected on every person and includes basic characteristics, such as age, sex, and race. The decennial census, though nominally a 100% count of the population, historically has undercounted hard-to-reach populations. In 2010, coverage of the AIAN population varied by geography. Nationally, AIANs living on reservations were undercounted by 4.9% compared with a 0.9% overcount in 2000.¹⁶⁷ For the 2010 decennial census, the Census Bureau reported an overcount of American Indians outside of reservations of 1.95%.

The reliability of ACS estimates for areas of smaller population and smaller population groups, like the AIAN population, have been questioned. DeWeaver¹⁶⁸ found that the 2006-2008 ACS 3-year estimate of the AIAN-alone population was 14.3% lower than the population predicted during that same period by the Census Bureau's Population Estimates Program.¹⁶⁹ Further, by definition, multiyear estimates cannot provide a point-in-time snapshot, which can be critical for certain analyses. Although the Census Bureau also produces 1-year estimates, those are not available for all geographies or population subgroups due to small sample sizes. A further limitation is that ACS data captures vacancy rates but not the reasons behind the vacancies. In Tribal areas, many vacancies are the result of units being uninhabitable, and other units may be vacant while awaiting routine maintenance or remediation from meth contamination, for example. Vacancy rates are frequently used as an indicator of an abundance of housing stock, and additional data on units needing serious rehabilitation, renovation, or remediation is needed to understand the underlying reasons for units that may not be inhabited.

It is also important to note that the 2020 U.S. Census enumeration occurred during the COVID-19 pandemic. Tribal areas in Washington saw lower self-response rates on average compared to the rest of the state's self-response rates.¹⁷⁰ Due to pandemic-related delays of the in-person nonresponse follow up (NRFU) operation, combined with pre-existing undercounts of Native people, and issues with the count of homeless individuals at Targeted Non-Sheltered Outdoor Locations (TNSOLs) that occurred during a rainstorm, it is expected that counts for urban Native populations will be under their true values. Additionally, many Tribal areas in rural parts of Washington, along with other rural areas, were a part of the Census' Update/Leave (U/L) operation, which confused and delayed participation. While advertisements and community organizations encouraged Census completion, the Census Bureau discouraged participation in April and early May by asking people in those areas to wait to complete the Census until instructions with their home's unique code were dropped off at their address. The Census resumed dropping off information at all homes in Washington in mid-May after Washington community groups led by the Washington Census Alliance asked that the Census stop discouraging Census participation in U/L areas.¹⁷¹ Census numbers determine funding mechanisms for Native housing, impact redistricting efforts, and produce data that can be used in advocacy efforts. While the impacts of COVID-19 and other bureaucratic issues on the Census data are not known yet, it is anticipated that the impacts will be felt by marginalized communities, including American Indians, Alaska Natives, and Native Hawaiians.

Home Mortgage Disclosure Act (HMDA) data collected by the Consumer Financial Protection Bureau were analyzed in this study to understand lending and homeownership access for Native populations, but the data

¹⁶⁷ U.S. Census Bureau, 2012

¹⁶⁸ DeWeaver, 2010

¹⁶⁹ 3-Year estimates were discontinued in 2013, and currently the Census releases 5-year estimates instead of 3-year estimates which are more accurate than 3-year estimates <https://www.census.gov/programs-surveys/acs/guidance/estimates.html>

¹⁷⁰ We Count Washington, 2020

¹⁷¹ OFM, 2020

raises concerns about coverage of loans by institutions that are not required to report HMDA data. Among depository institutions, the smallest institutions, institutions without any branches in a metropolitan statistical area, and institutions that are not federally insured or regulated or do not make loans insured by a federal agency or that are intended for sale to Fannie Mae or Freddie Mac, do not have to report HMDA data. Loans to AIANs living in rural areas originated by small CDFIs or Native-owned banks (non-depository institutions) outside of metropolitan areas may not be fully captured within HMDA data. Studies of the coverage¹⁷² of HMDA data for rural areas have provided mixed evidence, and the Federal Reserve Bank of Minnesota finds that, while HMDA provides adequate-to-good coverage of home lending in rural areas taken as a whole and in most rural counties, in a minority of rural counties and Indian reservations, coverage is 60% or less. This raises concerns that loans to AIANs living in rural areas originated by small CDFIs or Native-owned banks outside of metropolitan areas may not be fully captured within HMDA data, so these results should be interpreted with caution.¹⁷³

¹⁷² Johnson and Todd 2019

¹⁷³ Johnson and Todd, 2019

Findings

Qualitative and quantitative findings from this research study are presented below as follows based on the specific Native community served: Tribal housing, urban Native housing, Alaska Native communities, and Native Hawaiian communities. Within the Tribal housing subsection, findings are further broken out by region or size when relevant. This section presents the economic conditions of each group, followed by the group's specific housing needs and the barriers to meeting those needs.

Tribal housing

Washington's 29 Tribes operate 29 Tribal housing entities. Some are Tribally designated housing entities, such as a separate Tribal housing authority, while others are housing departments within the Tribal governance structure. Three Tribes do not manage any housing units and instead focus on providing rental assistance and other housing services, rather than serving as a landlord. According to APR documents received from HUD's Northwest Office of Native American Programs (NwONAP), of the 26 Tribes that do manage housing units, all 26 operate units funded by NAHASDA, and 20 operate units that were built under the 1937 Act. Tribal housing providers operate within their Indian Housing Block Grant (IHBG) formula areas, which include on-reservation land, off-reservation trust land, and, for some TDHEs, near-reservation service areas, which could include nearby counties or parts of nearby counties where they serve members.

Economic conditions

Reflecting national trends, American Indian/Alaska Native (AIAN) households in Washington Tribal areas earn low median incomes compared to the rest of the state. On reservation lands, about one in five households live below the poverty level, which is reflective of AIAN households statewide. Survey responses indicated that the top employer on-reservation lands for 80% of responding reservations are the Tribes, while other government entities (e.g., county, state, local) serve as the second-highest employer. Private businesses ranked third among employers, and the informal economy (e.g., fishing, crafts, and others) is the least common source of employment among those listed. As previously described, housing affordability is a big issue for AIANs statewide: According to survey responses from TDHEs, 60% of tenants or reservation residents do not earn enough to meet the basic costs of living, including food, utilities, rent/mortgage and transportation. The economic realities described previously, including high unemployment, low labor force participation, and few available jobs on reservations aside from Tribal government positions lead to living conditions wherein Tribal members cannot afford rent without being cost-burdened and/or live in substandard housing.

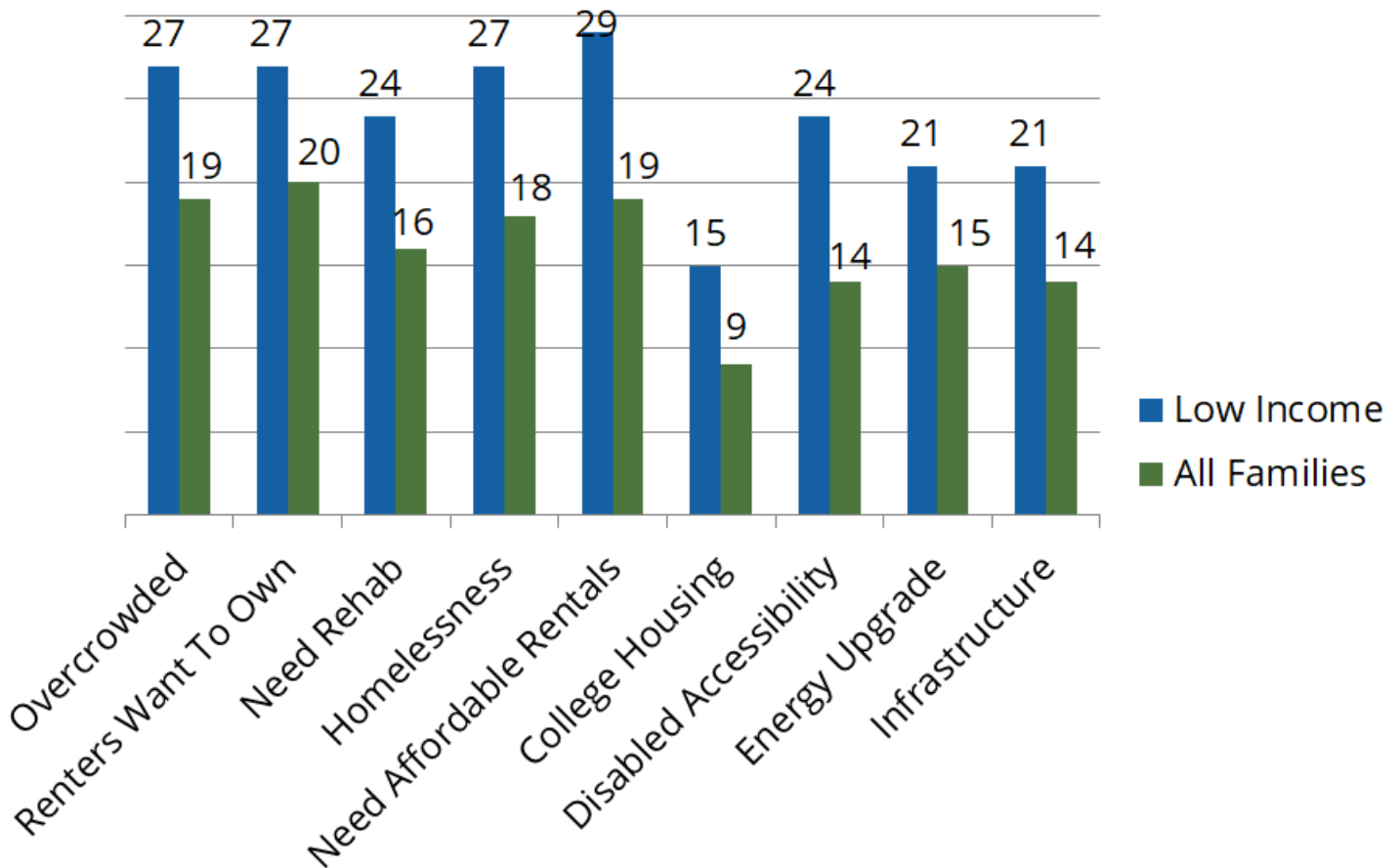
Needs

The primary housing need recognized by Tribal housing providers is for more safe and sanitary housing across the entire spectrum of housing, from homelessness to homeownership. The needs reported in this section were assessed using surveys, focus groups, informational interviews conducted by study coordinators, Tribal planning documents, and the existing HUD and ACS data reported above. Tribal housing providers said they needed affordable rentals, permanent supportive housing, transitional housing, housing that addresses overcrowding, homeownership opportunities for renters, housing for people experiencing homelessness, accessible housing for members with disabilities, college housing, energy upgrades and housing infrastructure.

Indian Housing Plan documents submitted by Tribes to HUD ask Tribes to select their housing needs in a table organized by type of need, as well as report if the need is for "Low-Income Indian Families" or for "All Indian Families." Most notably, all 29 Washington Tribes reported needing affordable housing for low-income families. Twenty-seven Tribes noted a need for housing for low-income renters who want to own homes, low-

income households experiencing homelessness, and low-income overcrowded households. The lowest stated need was for college housing for “All Indian Families,” which is likely due to the distance of most reservations from higher education institutions. At least half of the Tribes stated that they needed all other listed options, including rehabilitation, disabled accessibility, energy upgrade, and infrastructure for both low-income families and all families (see Figure 22).

Figure 22: Supportive services provided by TDHE and/or needed in the community



Source: Housing Provider Survey

The APR documents submitted to HUD also contain the results of inspections of HUD-funded units, including both 1937 Housing Act units and NAHASDA assisted units. Any units funded by non-HUD dollars are not included in the documentation. According to the data provided by Tribal housing entities in the 2019 APR documents (with 2018 APRs used in place of 2019 APRs for Tribes that did not submit 2019 documentation), of the 3,327 units funded or assisted by HUD dollars across the state, 268 units needed rehabilitation and seven units needed replacement. These numbers may be an underestimation. In the survey administered as part of this study, TDHEs were asked to estimate the percentage of existing housing stock that needed significant renovation or demolition. Based on the estimated percentages provided by survey respondents and the number of units that the responding TDHEs reported managing, approximately 688 units needed significant repair or renovation. Despite the fact that only half of the Tribes responded to these questions, the number of units needing renovation was reported to be significantly higher on the survey than in the APR documents.

The TDHEs that responded to the survey incorporated into this study identified several supportive services that they need and did not provide, or provide partially and need more. Emergency shelter was the most acute need

among the supportive services listed: All responding TDHEs identified needing more resources, and half do not currently provide emergency shelter. Other top services not provided but needed include long-term shelter, hygiene/shower services, and peer navigator/peer specialist services. The top services that were partially provided but which need more resources included meals/food, workforce training, case management, cultural healing/healing circles, clothing, and alcohol and other drug abuse (AODA) treatment/recovery (see Table 15).

Table 15: Supportive services provided by TDHE and/or needed in the community

Service	Not provided and needed	Partially provided, need more resources	Provided, no need for more resources	Not provided, not needed
Emergency shelter	8 (50%)	8 (50%)	0	0
Long-term shelter	10 (59%)	4 (24%)	3 (18%)	0
Healthcare/screening	1 (6%)	7 (41%)	9 (53%)	0
Mental healthcare/behavioral health/wellness services	2 (12%)	8 (47%)	7 (41%)	0
Domestic violence services	3 (18%)	7 (41%)	7 (41%)	0
Cultural healing/healing circles	2 (13%)	10 (63%)	2 (13%)	2 (13%)
Meals/food	1 (6%)	14 (82%)	2 (12%)	0
Hygiene/showers	7 (41%)	7 (41%)	1 (6%)	2 (12%)
Clothing	5 (25%)	9 (45%)	1 (5%)	5 (25%)
Alcohol and other drug abuse (AODA) treatment/recovery	2 (13%)	9 (56%)	1 (5%)	5 (25%)
Peer navigator/peer specialist	6 (38%)	8 (50%)	1 (6%)	1 (6%)
Workforce training	3 (18%)	12 (71%)	1 (6%)	1 (6%)
Case management	2 (12%)	11 (65%)	4 (24%)	0

Source: Housing Provider Survey

In addition to supportive services, surveyed TDHEs identified a number of housing services needed by communities they serve. The top services needed and not provided by surveyed TDHEs included transitional housing, housing choice vouchers, supportive housing, fair market housing, and the development of new housing. The top services that TDHEs already provide but need more of include low-income rental housing, housing rehabilitation (of TDHE-owned or privately-owned homes), homebuyer readiness/financial literacy programs, and assistance with rental move-in costs (see Table 16).

Table 16: Housing services provided by TDHE and/or needed in the community

Service	Not provided and needed	Partially provided but need more resources	Provided and no need for more resources	Not provided and not needed
Transitional housing	11 (65%)	6 (35%)	0	0
Housing Choice Vouchers (Section 8)	11 (65%)	2 (12%)	1 (6%)	3 (18%)
Supportive housing	9 (53%)	6 (35%)	2 (12%)	0
Fair market housing	9 (56%)	4 (25%)	2 (13%)	1 (6%)
New housing development	7 (41%)	8 (47%)	2 (12%)	0
Housing rehabilitation (of TDHE-owned or private homes)	3 (19%)	10 (63%)	3 (19%)	0
Homebuyer readiness/financial literacy	3 (18%)	10 (59%)	3 (18%)	1 (6%)
Low-income rental housing	0	13 (76%)	4 (24%)	0
Rental move-in costs	3 (18%)	10 (59%)	4 (24%)	0

Source: Housing Provider Survey

The number of families on waiting lists for Tribal housing units can be used as an indicator of need and is useful in determining the amount of housing needed for a particular Tribe or Tribal area. Using the housing provider survey administered in this study, study coordinators assessed housing need by reviewing waiting list numbers and asking housing directors to estimate how many units were needed to meet the Tribe’s housing needs. Both numbers are considered here because, due to long waiting lists, some families opt to live with other community members instead of joining the waitlist themselves or are unable to be on housing authority waiting lists due to eligibility constraints. These waiting list numbers and estimates of units needed should be considered illustrative of a larger picture of housing need, as not all TDHEs completed the survey; unreported housing need is likely similarly high or higher than the numbers gathered by those TDHEs with the capacity to participate in this study effort.

For the 13 Tribes who responded to this survey question, the estimated total number of units required to meet current housing need was 2,490. This number is particularly staggering when compared to the number of units that those same Tribes currently manage: 1,752. If the total number of currently managed units plus the number of units needed to meet the current housing shortage is considered 100% capacity, these 13 Tribes are operating at only 41% capacity. The combined waiting list numbers for these Tribes came to 2,301 families. Without significant new housing development, it is likely that many of the families on these waiting lists will remain unhoused by TDHEs, making additional housing development a high need for Tribes and TDHEs.

Overcrowding estimates can also illustrate a need for more housing. ACS data used to determine IHBG funding indicate that there are 2,690 overcrowded households with an AIAN head of household (alone or in combination with other races) in formula areas served by TDHEs in Washington. Some of these instances of overcrowding come from the practice of “doubling up” in housing authority units, which occurs when a family opts to live with another family in a Tribal housing authority unit. Many of these instances of doubling up are known and allowed, but many occur without the knowledge or permission of the housing authority. Some families in need of housing may not be eligible for their own housing authority unit, which is a frequent reason for doubling up.

ACS data used to determine IHBG funding shows there are 6,593 AIAN-headed households living on reservation lands and other lands served by TDHEs with housing expenses (including rent or mortgage and basic utilities) that are severely cost-burdened or spend greater than 50% of their household’s income on rent. This indicates that there is a substantial need among these households for affordable housing and/or housing subsidies. According to survey data collected for this study, 94% of the 16 responding TDHEs noted that the cost of living for housing had increased in their area in the past five years, and 88% of the 16 responding TDHEs noted an increase in the cost of living for utilities and food over the same period.

Housing providers described other possible indicators of housing need, including the cost of living, overcrowding, and doubling up. While overcrowding estimates are provided by the ACS data, the data have been shown to not always be representative of the realities that minority groups, including American Indian/Alaska Natives (see [Limitations of Data](#)). Eleven of 16 respondents noted that at least 20% of their households were overcrowded, and 10 reported that at least 20% of their households contained two or more families (doubled up). The causes for overcrowding or doubling up were cited as lack of available homes for rent or sale at fair market value, leading families to live with other families or to live with multiple generations under one roof. As heard in focus groups, multigenerational housing is preferred by many families and is a part of the culture of many Tribal communities in the Pacific Northwest, so many instances of families doubling up are due to community preference, and housing is frequently built to accommodate this preference. However, sometimes families are forced to double up in smaller homes, which leads to overcrowding. Often, doubling up can be the result of low household incomes and a lack of available housing.

For families who rely on housing assistance, focus group participants reported that unauthorized long-term guests can jeopardize household eligibility for assistance programs because their presence may result in a violation of the tenant’s lease agreement, or the inclusion of their income may cause the tenant’s household to exceed established income limits. For Tribes with high rates of methamphetamine use in their communities, focus group participants also noted that unauthorized guests often also lead to units testing positive for methamphetamine contamination, subsequently making the leaseholders ineligible for future Tribal housing assistance and often forcing leaseholders to foot the bill for remediation. An outstanding balance sheet resulting from meth remediation, unpaid rent, or other unpaid fees often renders a tenant ineligible for future housing until the balance is paid.

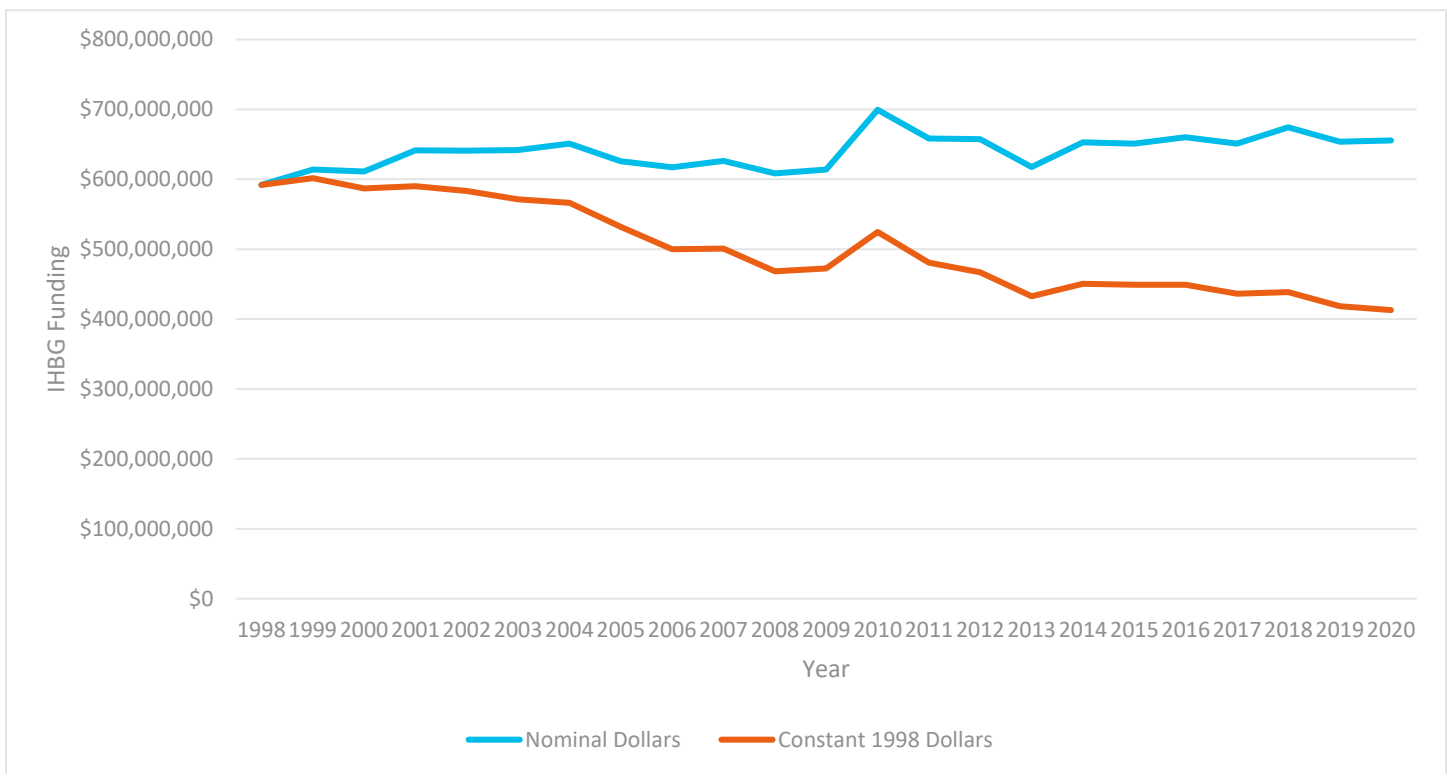
Homelessness is an issue on Tribal lands: 94% (15/16) of TDHEs responding to the survey reported that people in their area were living in uninhabitable spaces, such as abandoned buildings, cars, or outside. One TDHE respondent noted that these are people who usually cannot qualify for housing assistance from the Tribe due to eligibility requirements applied by the programs; they may be Tribal members from other Tribes or non-Tribal members living in the area who are not eligible for Tribal services, including housing assistance.

Barriers

Funding levels and sources: Indian Housing Block Grant

For most Tribes in Washington, Indian Housing Block Grant (IHBG) serves as the Tribally-designated housing entities' (TDHE) primary source of funding for housing, but the amount of annual IHBG funding has not increased to account for inflation or population growth in formula areas since the program's inception in 1996 (see Figure 23). In 1998, the earliest year for which HUD provides easily accessible data summarizing funding amounts and the number of AIAN individuals and households living in formula areas on their website, HUD awarded \$613.9 million among 580 Tribes and 1.1 million American Indian/Alaska Native persons living in Tribal areas, which is approximately \$558 per person. In 2020, the final allocation of \$655.4 million was awarded to 593 Tribal entities and 1.7 million AIAN persons living in formula areas, or about \$385 per person, which had the same buying power as \$241 in 1998 dollars. According to Randall R. Akers, former Acting Deputy Assistant Secretary at HUD, "One of the greatest impediments to developing affordable housing in Indian Country is the flat funding of the Indian Housing Block Grant for most of the program's history."¹⁷⁴

Figure 23: IHBG annual allocation, 1998 to 2020



Sources: HUD, IHBG Formula Annual Allocations; BLS, CPI-U

The severely limited federal block grant funding leaves Tribal housing entities scrambling to find funding for the maintenance and operation of Native American Housing Assistance and Self-Determination Act-funded units and often provides no support for new housing development projects, especially for smaller Tribes. For smaller housing authorities, IHBG funding may barely cover staffing costs. The Formula Current Assisted Stock (FCAS) portion of IHBG funding supports the maintenance and operation of existing 1937 Act units but

¹⁷⁴ U.S. Commission on Civil Rights, 2018

does not fully cover the maintenance and operation of NAHASDA-built units or the development of new units. This has left many Washington TDHEs with aging and decaying housing stock. Ten out of 14 responding TDHEs (71%) noted in the survey that at least 20% of their managed housing stock needed significant rehabilitation, much of this due to the aging housing stock.

One result of limited or inadequate IHBG funding is that competition for other funding discourages collaboration between Tribes and housing entities. Collaboration and sharing of resources and information is an important aspect of sustainability and could help Tribes weather staff turnover and limited resources by incentivizing the creation of a knowledge-sharing network. However, many Tribes and housing entities are less willing to collaborate when it may mean potentially losing a necessary grant or funding opportunity to another entity. Competitive funding opportunities that award large grant amounts, such as Indian Community Development Block Grant (ICDBG) or the Indian Housing Block Grant (IHBG) Competitive grant, are extremely helpful for the very few Tribes who receive the grant in that cycle but leave many of the Tribes with the least resources without any funding at all. Those Tribes ultimately do not have the staff capacity to write a competitive application, nor is a small Tribe as likely to receive a \$5 million grant as a larger Tribe that can demonstrate need in higher numbers and likely has more staff members. Focus group participants described how the same Tribes end up getting passed over for competitive grant funding repeatedly in favor of Tribes with dedicated grant writers, the ability to hire consultants, or housing departments with more staff that can assist with applications or dedicate time and energy to learning about new funding opportunities. When asked in focus groups if competitive grants successfully balance housing need with staff capacity, many participants agreed that smaller Tribes with fewer staff members had a more difficult time accessing these funds despite high levels of need.

Funding levels and sources: Other funding sources

Tribes, housing entities, and consultants praised Washington's local, state, and federal agency staff, including the local offices of HUD ONAP and USDA Rural Development, as well as the Washington State Housing Finance Commission. The staff of state agencies were consistently recognized for their efforts to make funding sources work for Tribes, as well as their willingness to acknowledge and educate themselves regarding the complexities of Tribal sovereignty. For consultants who work with Tribal housing entities nationwide, Washington was consistently noted as one of the best states to work in for these reasons.

Positive engagement of agency staff, however, is not enough to remove barriers presented by federal and state regulatory frameworks and funding mechanisms. Stakeholders noted a lack of consistency in the interpretation of various grant and program restrictions and regulations. For HUD funding, interpretation can differ between regional offices, as well as between regional offices and the national office. Similar issues were raised about other federal funding, most notably CARES Act funding granted to Tribes to help with COVID-19 and ICDBG Imminent Threat projects. During information sessions about Tribal CARES Act funding, stakeholders in this study noted that HUD representatives avoided providing specific details or answering specific questions to ensure that they were not providing "preferential treatment" to any Tribe. However, when it came to approving uses of this funding, interpretations of what constituted an acceptable use of funds differed widely; some Tribes received approval to construct new housing in order to house vulnerable Tribal members, while others were told that new construction was not an appropriate use of CARES Act funding because the money was allocated only for projects that were short-term, strictly related to pandemic response, and could not continue to be used for other purposes post-pandemic.

The Tribal HUD-VASH demonstration program, while successful for the Tribes invited to participate, also proved to be difficult to implement. Restrictions regarding usage of subsidized FCAS units (such as units developed under the 1937 Housing Act) for this program and challenges related to securing low-income

housing tax credits to construct new units to support project-based assistance caused many Tribes to experience difficulties developing or identifying the units necessary to enroll Tribal veterans in this program. A lack of sufficient VA staffing in some areas also made it difficult for TDHEs to secure the necessary supportive services to bring new veterans into the program.

Lack of available housing

Many surveyed Tribes noted a lack of available housing or funding to develop additional housing for middle-income families. These families do not qualify for low-income housing resources through their Tribe, but in many cases, they also cannot afford fair market rental units and are not in a financial position to consider homeownership. As noted in the [Washington Housing Market section](#), the Housing Affordability Index for AIAN statewide is 67.1, indicating that median home price is higher than the median AIAN household income can afford. This middle-income group includes much of the workforce, including employees of the Tribe and housing authority, trade workers, and service providers. There are currently few to no resources available to fund or develop housing for the portion of the population that has a household income above 80% AMI, but is still unable to find housing within their budget in or near Tribal lands.

The lack of available vacant housing available for occupancy on reservations is displayed in ACS data: While 15.6% of vacant units in Washington are available for rent and 8.3% for purchase, only 4.5% of vacant homes on reservation lands are available for rent and 5.1% are available for purchase, with a vast majority of vacant housing on Tribal lands (64.2%) being used for seasonal, recreational, or occasional use. These uses of already-limited housing stock as non-primary residences or vacation rentals further restrict the range of options for Tribal members seeking to rent or purchase housing on Tribal lands (see Table 17).

Table 17: Status of vacant units on reservation lands and in Washington

Vacancy status	Tribal lands	Washington
For rent	4.5%	15.6%
For sale only	5.1%	8.3%
Rented, not occupied	2.2%	4.8%
Sold, not occupied	2.1%	4.2%
For seasonal, recreational, or occasional use	64.2%	36.6%
For migrant workers	0.5%	0.7%
Other vacant	21.5%	29.9%

Source: ACS, 2019 5-Year Estimates

Human resources and internal capacity

One of the most significant identified barriers to housing development is staff turnover. In the APRs submitted by Tribal housing providers, staff turnover was frequently listed as the reason a program was behind schedule or could not successfully be implemented. Staff turnover was also frequently cited as a barrier in the survey, focus groups, and interviews with knowledgeable sources conducted as part of this study. For many TDHEs, turnover is most challenging when it involves the housing director position. Frequent change in leadership

means that longer-term goals and projects requiring years of pre-project financing, organizational planning, and inter- and intra-department collaboration either do not get off the ground or cannot be fully realized. Many project stakeholders agreed that the most successful Tribal housing departments have long-standing leadership and that helping prevent staff turnover is an important step in building capacity for more ambitious projects within a housing entity.

Staff turnover occurs not only within housing entities and departments, but also within Tribal governments and state and federal agencies. Regardless of the entity, each departing staff person means a loss of institutional knowledge and important experience working on projects and collaborations that take years of background work and education to become successful. Housing staff, consultants, and agency staff all shared examples of successful collaborations or programs that ended due to the loss of a single staff member. For example, advisory group members pointed to USDA's coordination of a statewide working group called the Tribal Housing Action Team (THAT) for over a decade. The group included various agency representatives that took a proactive approach to help Tribes organize and coordinate housing development projects. This unique body worked together across agencies to fit together separate funding pieces using a project-based method while also fostering education and collaboration more generally in Washington. However, when the two USDA staff members responsible for coordinating this effort left their positions, the working group ended, highlighting the instability of cross-institution relationships that often continue only because of the sustained efforts of specific staff members.

Political barriers

Political volatility and uncertainty within a Tribe can present barriers to housing development. The structure of a Tribe's housing program and its relationship to the Tribal government is not consistent throughout the state. For smaller Tribes with few managed units, the Tribal housing entity is typically a Tribal department nested within the larger Tribal governance structure. The units are owned by the Tribe and housing staff are employed and managed by the Tribe. For larger Tribes with more managed units, the Tribal housing entity is typically a chartered entity that is separate from the Tribe in terms of oversight, funding, and administration. For Tribes with chartered housing entities, the relationship between the Tribe and the housing entity is vitally important. Outside of the IHBG funding that passes through the Tribe to the TDHE, few TDHEs receive funding from the Tribe, and usually only Tribes with significant gaming revenue can afford to fund their housing entity. If they seek any funding from the Tribe, housing entities must compete for funding alongside other Tribal programs, and Tribal officials may or may not view housing as a top priority for the Tribe. Disparate priorities and resources can leave Tribes and their housing entities at odds or with differing goals. However, collaboration is necessary to get housing development projects off the ground with respect to cross-entity or cross-department responsibilities, such as design, permits, land use, infrastructure, and placement of services.

There is political pressure for Tribes and Tribal housing entities to keep the rent payments charged for affordable housing units low, which means that housing authorities typically cannot generate adequate revenue from collected rent payments. The Brooke Amendment of the Housing and Urban Development Act, passed in 1969 and updated in 1981, imposed the 30% rule, mandating that rent in public housing cost no more than 30% of a household's income (Rental Burdens: Rethinking Affordability Measures). While some Tribes do follow the 30% rule, many only charge 15-20% of household income or make allowances for elders, veterans, and other vulnerable groups that allow them to pay less than 30% of their household income towards rent. Some housing authorities cap rent at a certain amount regardless of the household's income, and most housing authorities provide housing to a certain number of households that have no income and, as a result of the 30% rule, pay no rent at all. In addition to rent subsidies and assistance, many households receive subsidies for utilities and other housing expenses. According to focus group discussions with Tribal Housing experts, because Tribal members are used to paying low rents and typically do not have the financial means to

pay anything close to the market rate for housing expenses, raising rents or transitioning from housing authority-managed units into market-rate rentals or homeownership can be difficult due to “sticker shock” for rent and housing expenses. This is a barrier for families interested in homeownership, as a typical mortgage payment can be many times the amount a family is used to paying to rent a housing authority unit.

Legal/regulatory barriers

Environmental regulations require a review process wherein Tribes and TDHEs assess the potential environmental impacts of a project and ensure that all projects meet federal, state, and local standards. Environmental review laws protect air quality, coastal areas, endangered species, farmlands, aquifers, wetlands, wild and scenic rivers, and historic sites; they also protect people from noise, site contamination, explosive and flammable facilities, flooding, airport hazards, and other environmental justice issues (HUD Exchange, 2013). However, due to the different levels of government involved, Tribes must apply a myriad of sometimes conflicting and competing environmental regulations based on their development plans and funding source (though regulators are working to streamline the process). In addition to these protections, environmental reviews assess local community facilities. This lengthy review process that requires all HUD projects to conform to the National Environmental Policy Act (NEPA) in addition to other state and local laws can delay projects and increase the costs of development, according to interviews with Tribal housing leaders.

In addition to environmental regulations, many Tribes have laws or policies that require housing be built within a certain distance of a road to limit development costs and preserve open lands. This significantly constrains the amount of land available for homesite use, and many Tribes are considering reducing the amount of trust land included in a homesite lease. In some cases, all or nearly all of the undeveloped land in critical economic development and high traffic areas may have already been assigned to Tribal members through homesite leases. Additionally, a portion of the available land may either be wetlands, forests, shoreline, or other land types that are not feasible or not legal to build on. TDHE leaders also noted that they often struggle to achieve community acceptance of affordable housing near their homes or neighborhoods, similar to the “NIMBY” (not in my backyard) attitudes often expressed about affordable housing development in urban areas.

Land ownership status

Developing housing on trust land¹⁷⁵ comes with numerous administrative and bureaucratic barriers. While Tribes are sovereign nations and have the authority to manage their own lands and govern with their reservation boundaries, land held in trust for Tribes also comes with unique hurdles when it comes to developing housing or buying and selling homes. Available trust land is often in short supply and reservations frequently contain fee land,¹⁷⁶ which is subject to county and state jurisdiction unless it is purchased by the Tribe and taken into trust. Fractionated land¹⁷⁷ further reduces the amount of available land and causes much of the land and housing on some reservations to go unused. Additionally, TDHE focus group participants reported that when Tribes or Tribal housing entities seek to purchase adjacent off-reservation lands or fee lands within reservation boundaries to build new housing, landowners may overcharge for these desirable land parcels.

Homeownership

Of the 13 TDHEs who responded to the survey question, all noted that interest in homeownership in their community had either increased or stayed the same over the last three years. Seven of those TDHEs rated interest in homeownership as “high.” When asked to list the three most important barriers to attracting lenders,

¹⁷⁵ Tribal land held in trust by the Department of the Interior

¹⁷⁶ Land that is alienable and not held in trust

¹⁷⁷ Land that is owned by multiple owners, none of whom has majority or controlling interests

half of the responding TDHEs selected “trust land status,” with “other land/title issues” serving as the second most frequently cited barrier. As for the barriers to homeownership for Tribal members, the barriers most noted by responding TDHEs were issues such as low credit scores, a need for assistance with down payments and closing costs, and not enough income to make monthly mortgage payments. Issues such as lack of credit history, need for assistance in navigating the homebuyer process, and lack of available housing were also commonly cited.

Many Tribal members in Washington are interested in owning homes on Tribal lands, but buying and selling homes on trust land comes with many complications. Finding home appraisers, getting a Title Status Report (TSR) through the BIA, and finding a lender willing to work on trust land all present barriers to buying and selling homes on Tribal land.

Appraisals

The appraisal market poses multiple challenges, which, in combination with other market factors, constrains or weakens housing markets in Tribal lands. First, there are few appraisers who will work on some Tribal lands, especially in more rural areas, often due to travel time and the inherent difficulty of appraising a property when there are no recent comparable public sales of homes (South Dakota Native Homeownership Coalition, 2021). The closed nature of the housing market on reservations, where homes can often only be sold or transferred to other Tribal members, limits sales and makes it difficult to find recent comparable sales. In some instances, when no comparable sales can be found, appraisers must use the cost approach to valuing homes. The cost approach allows for an estimate of home value by determining the cost to build the home and subtracting depreciation. Not all lenders accept appraisals using the cost approach because loans originated without a sales comparison approach often cannot be sold on the secondary market for home loans, and this can stifle lending opportunities for potential homebuyers on reservation lands. Additionally, focus group members noted that Tribes located in rural and coastal areas, in particular, struggle to find appraisers willing to travel to work in these areas. Finally, appraisals of trust lands are performed separately by the U.S. Department of the Interior’s (DOI) Appraisal and Valuation Services Office (AVSO), which can further delay the process. In order to avoid AVSO delays, Tribes such as the Confederated Tribes of the Colville Reservation in Washington and the Morongo Band of Mission Indians in California contracted with DOI to conduct the services previously provided by the AVSO, which allows the Tribe to contract directly with private appraisers to limit wait times for appraisals and enables the Tribe to generate revenue from its work as a contractor for DOI.

Title status report process through BIA

Once a Tribal member has begun the process of purchasing a home on Tribal land, the transfer of title is an additional administrative hurdle the homeowner must complete. The BIA issues Title Status Reports (TSRs) through the Land Title and Records Office (LTRO) at the Division of Land Titles and Records. The Northwest office is in Portland. The process of working through the regional LTRO can slow the home buying process, jeopardizing time-sensitive loan guarantees provided by HUD under Section 184.

Attracting lenders

Finding a bank or lender who will conduct mortgage lending on Tribal trust land presents additional challenges. First, as noted above, few lenders will accept appraisals of homes without comparable sales data, which may not exist on reservation lands. Next, Native housing finance experts in the advisory group noted that lending on Tribal trust land has historically been difficult because Tribal trust land cannot be used as collateral that can be repossessed by lenders if the homeowner falls behind on payments. These two factors render lending institutions unable to package loans to sell on the secondary home loan market, effectively decreasing the liquidity of lenders that choose to work on trust land. Additionally, advisory group members noted that institutions might be uncertain about providing loans in Indian Country because they do not understand Tribal

sovereignty, worry about the perceived lack of a politically independent judicial and dispute resolution process, and are unfamiliar with Tribal commercial laws. Discrimination against Native people, along with AIAN and Native Hawaiian inexperience with lending entities also present barriers to getting loans. Finally, the Bureau of Indian Affairs (BIA) can take months or years to provide certified Title Status Reports (TSRs) on trust lands, which can make transactions difficult for lenders who may not be able to predict what mortgage rates will be when these processes are finally completed. All of these factors combine to reduce access to loans on trust land.¹⁷⁸ In addition to facing processing issues, many potential borrowers have creditworthiness issues and insufficient incomes and savings to qualify for mortgages.

These barriers to Native homeownership are common throughout the nation. "Mortgage Lending on Tribal Land," a report prepared by Urban Institute as part of the national Assessment of American Indian, Alaska Native, and Native Hawaiian Housing Needs for HUD, found that challenges remain for lenders when originating mortgages on reservations and other Tribal areas.¹⁷⁹ Lenders reported that the extreme difficulty in using Tribal trust land as collateral is no longer a huge issue, given the Section 184 Program's 100% home loan guarantee.¹⁸⁰ Rather, the lenders indicated that mortgage lending on Tribal trust land remains a time-consuming process that reduces the appeal of lending on Tribal trust land, even with the federal guarantee. The process becomes time-consuming because it requires securing appropriate land leases, TSRs, and environmental clearances. This process is so long, in part, because of the requirements under the Section 184 Program for Tribes to develop and execute leases for land on which the mortgaged property is located. Therefore, lenders indicate that they prefer to work with Tribes that have the capacity to develop leases and get them approved relatively quickly.

Specific barriers based on tribal characteristics

Small Tribes

Size plays a significant role in the funding and capacity of a Tribe's housing entity or department, and small Tribes are at a distinct disadvantage when trying to develop new housing. IHBG funding is dependent upon population size and the number of households demonstrating need based on specific criteria. Smaller Tribes receive less funding through IHBG, and, for some Tribes, the small amount of funding is not enough to develop new housing or even cover staffing. In 2020, six Washington Tribes received an IHBG allocation that was less than the total development cost (TDC) of one new housing unit on their reservation (in 2020, TDCs ranged from \$404,025 to \$445,427).¹⁸¹ New housing development does not scale well for smaller Tribes, as infrastructure must be built no matter how small the development, and these smaller Tribes frequently must utilize the Title VI Loan Guarantee Program to build any housing.

Smaller Tribes noted in focus groups that they have difficulty getting contractors, as smaller developments are less competitive, and many contractors are less willing to work on smaller projects. Lower funding levels also prevent Tribes from acquiring land on which to build housing. As noted above, small Tribes are also at a significant disadvantage when it comes to competitive grants. Grant sizes for small Tribes are typically for fewer dollars but come with the same amount of compliance requirements, as do large grants for bigger Tribes. Because infrastructure and compliance do not scale down well for smaller Tribes or projects, many funding mechanisms like the Low-Income Housing Tax Credit (LIHTC) or New Market Tax Credits are not a good fit. Housing directors at small Tribes explained their frustration in focus groups and interviews at the

¹⁷⁸ U.S. Commission on Civil Rights, 2018

¹⁷⁹ Listokin, Temkin, Pindus, & Stanek, 2017

¹⁸⁰ Ibid.

¹⁸¹ HUD, 2020

complex compliance restrictions, noting that the staff time required for these projects is usually not feasible or worth it for the grant amount. For some programs, like LIHTC, the projects proposed by smaller Tribes simply do not meet eligibility requirements. LIHTCs require a proportion of units that are reserved for renting to households of various low-income levels,¹⁸² and smaller Tribes have trouble finding enough Tribal members in need of housing that meet the specific income-based eligibility requirements.

Coastal Tribes

Coastal and Olympic Peninsula Tribes described difficulties in a number of areas, including a limited number of available contractors, high infrastructure costs, difficulty acquiring land, traffic and safety issues on U.S. Highway 101, and a lack of available fair market rental housing. The Olympic Peninsula can be difficult to access from other parts of the state and is only accessible via U.S. Route 101, which winds east along the northern shore of the Olympic Peninsula then south to Tumwater. The roadway frequently becomes a two-lane highway, notably as it enters Sequim through Discovery Bay. Highway 101 is a vital access road for a number of Washington's Tribal lands and reservations, including the lands of the Hoh, Jamestown S'Klallam, Lower Elwha, Makah, Quileute, and Quinault Tribes. For these Tribes and reservations, traffic issues pose a barrier to development. One Tribal survey respondent noted that they have land to build on, but a full-scale transportation study must be completed to identify the impacts of new housing development on traffic conditions and to assess if safe alternatives could be built to prevent residents turning across traffic onto Highway 101, which can be unsafe for motorists and require long waits for a break in the traffic. The housing authority manager stated that they could not responsibly build new housing without providing residents with safe transportation options.

Limited availability of contractors and high infrastructure costs are related to the remote nature of the Olympic Peninsula. Getting building materials to the peninsula is difficult and expensive, and new housing development would require contractors and their employees to relocate to the peninsula, or at least obtain overnight accommodations, for the duration of the project. For these reasons, coastal and peninsula Tribes have difficulty finding affordable contractors willing to travel to the area.

An additional constraint is the lack of fair market rental units in the peninsula area. The Olympic National Forest, which covers a significant portion of the peninsula, once had a thriving logging and timber industry, but conservation efforts led to increasing restrictions on commercial logging. In 1990, the U.S. Fish and Wildlife Service designated the northern spotted owl, which lives in old-growth forests in the Pacific Northwest, an endangered species. Logging was restricted or halted in over half of the Olympic Peninsula's forests. Later designations of multiple species of salmon and trout as endangered further disrupted logging in the area.¹⁸³ As a result, the once-thriving economies of logging towns like Forks and Aberdeen dwindled, and there has been little economic growth in those areas since. Housing staff who live in former logging towns noted that few economic and employment opportunities are available for Tribal members, and that the lack of economic growth also means that no new housing has been added in nearby towns in many years. Fair market rental units and affordable home sales are scarce, which means that there is no temporary or longer-term workforce housing for contractors, construction workers, or support staff needed to implement supportive housing projects or Tribal clinics. The increased use of private homes as vacation rentals in the peninsula area also reduces the availability of fair market rental stock. Vacation rental homes are spread throughout the Olympic Peninsula due to the popularity of the protected natural areas and are offered online through websites such as Airbnb.com. The conversion of fair market rental housing into vacation rentals leaves the Tribes responsible

¹⁸² Congressional Research Service, 2021

¹⁸³ Center for the Study of the Pacific Northwest, n.d.

for housing Tribal members who are unable to find alternative housing outside of the housing provided by the Tribal housing entity.

Tribal areas near Sequim face rising costs of living. Sequim has become a popular retirement community because of its coastal beauty and unique location in the Olympic “rain shadow,” with an average annual rainfall of only 17 inches (for comparison, Forks, also located in the Olympic Peninsula, gets an average of 110 inches of rainfall a year). Sequim’s popularity as a bedroom community has made the area less affordable for neighboring Tribal communities because rising costs have not been accompanied by additional employment opportunities. Many Tribal members from nearby Tribes prefer to live in Sequim due to accessible amenities and employment rather than live on reservations. Peninsula Tribes near Puget Sound are experiencing a similar rising cost of living associated with direct ferry access to Seattle, making those areas popular places to live for urban commuters. As noted by a housing director in one of our focus groups, Tribal communities in these areas end up experiencing the pitfalls of urban issues, including high housing costs, traffic and homelessness, as well as coastal issues like limited availability of contractors and high infrastructure costs.

Eastern Washington/Columbia River Tribes

Eastern Washington Tribes experience some similar issues to peninsula Tribes, specifically issues concerning the ability to secure contractors and source affordable building materials, as well as high infrastructure costs related to their remoteness. They also suffer from a lack of workforce and other middle-income housing because fair market prices are not affordable for many households, yet these households’ slightly higher incomes also make them ineligible for low-income housing. Many Tribal members from Eastern Washington tend to live near cities such as Spokane due to the proximity of amenities, but focus group participants noted that many of these members would prefer to live on or near their reservation if housing was available. Like the coastal areas, Eastern Washington has also seen a rise in the use of private homes as vacation homes and rentals, which cuts into the available housing stock for full-time residents.

Eastern Washington Tribes also experience issues unique to their location. One such issue is the political landscape, which differs significantly from more liberal urban areas in Western Washington like Seattle, Tacoma, or Bellingham. Tribes noted that elected officials and government bodies are often less willing to communicate or collaborate with Tribes in the eastern part of the state.

Eastern Washington is located in the rain shadow of the Cascade Mountains and has very different geography and climate than the coastal Tribal areas, making Eastern Washington at higher risk for fire. The areas east of the Cascades experience hotter summers and colder winters, and Eastern Washington is home to a significant portion of the agricultural output of Washington. Climate change has contributed to increasingly dry weather and subsequent fire danger in Eastern Washington. 2020 was an especially devastating year for wildfires all along the West Coast, but fires were particularly devastating in Eastern Washington. One Eastern Washington Tribe suffered the loss of numerous housing authority homes as well as the loss of homes belonging to Tribal members. While the housing authority units can be rebuilt using insurance proceeds, the housing authority must also house the families displaced by fires that burned down private homes, which further stretches its already-limited housing funding.

There are four federally recognized Washington Tribes that live along the Columbia River, which runs north to south through the middle of Washington and along the state’s southern border with Oregon. The building of dams along the Columbia River by the federal government changed the landscape of the area dramatically, submerging homes and traditional Tribal fishing areas and disrupting the movement and spawning patterns of salmon populations (see the [Highlighted Housing Issues](#) in Appendix B for more information).

While Eastern Washington Tribes operate casinos, some of these casinos receive less traffic than casinos along the I-5 corridor or near the Seattle metropolitan area, reducing the gaming revenue possible for those Tribes. Even if a Tribe has a casino, many housing authorities or departments do not receive funds from the Tribe.

Opportunities/developments

Despite the myriad of funding and bureaucratic barriers faced by Tribal housing entities, they have implemented a wide range of programs and serve thousands of households across the state. According to Annual Performance Report (APR) forms submitted to HUD for fiscal year 2019 by 24 of Washington's 29 Tribes, these 24 Tribal housing entities had plans to serve 8,863 households across 359 HUD-funded housing programs. Ninety six percent of these households were successfully served in 2019. Related Indian Housing Plan (IHP) documents for fiscal year 2020, which were submitted by all 29 Washington Tribes, reported that 10,313 households would be served by HUD-funded housing programs in 2020.

Funding levels and sources

Addressing homelessness

The Consolidated Appropriations Act of 2021, passed by Congress in response to COVID-19, allows for Tribes and TDHEs to access the Continuum of Care Program.¹⁸⁴ The program, which is national but organized at a regional level, is already used by cities and other non-Tribal jurisdictions and provides funds to quickly rehouse individuals and families experiencing homelessness. Tribes and TDHEs were previously not eligible to participate in the program. To utilize the program, Tribes and TDHEs are required to participate in Point-in-Time (PIT) counts and other regional data collection efforts, which will also produce more accurate statewide numbers on homelessness.

Leveraging

Low-Income Housing Tax Credits can be used in combination with Housing Trust Fund resources, Federal Home Loan Bank's Affordable Housing Program, ICDBG, or IHBG Competitive. For projects that are too small for LIHTC, Washington's Housing Trust Fund offers funding options that may work better. Title VI funds can be leveraged with Section 184 by using Title VI to pay for infrastructure or housing development and passing costs along to homeowners using Section 184 or USDA Section 502.

Lower Elwha Housing Authority was able to leverage funding from the Federal Home Loan Bank of Seattle for a 25-unit LIHTC project in 2012. According to a LIHTC expert in the study advisory group, this project is an excellent example of using LIHTC for eventual homeownership, as the units are meant to convey at the end of the initial 15-year LIHTC compliance period. Several other Tribes have used a tax credit to homeownership structure to provide additional homeownership options for their enrolled members.

Section 184 lending limit

HUD recently increased Section 184 lending limits, thus enabling potential Native homeowners to enter more urban and metropolitan housing markets. The 2018 Section 184 loan limit for a 1-unit King County single-family home was \$453,100,¹⁸⁵ while the median home resale price in King County was \$685,000.¹⁸⁶ In 2020, the loan limit for a 1-unit single-family home in King County increased to \$741,750,¹⁸⁷ which is far closer to King

¹⁸⁴ Text of the House Amendment to the Senate Amendment to H.R. 133, 2020

¹⁸⁵ Section 184 Maximum Loan Limits, 2018

¹⁸⁶ Housing Market Snapshot: State of Washington and Counties, Third Quarter 2018

¹⁸⁷ Section 184 Maximum Loan Limits, 2020

County's median home resale price of \$747,200.¹⁸⁸ This lending limit increase creates more opportunities for Native homeownership, even in Washington's most expensive urban areas.

HUD-VASH expansion

The 117th U.S. Congress passed a bill in 2020 to expand the HUD-Veterans Affairs Supportive Housing program (National Low Income Housing Coalition, 2020). The program, which provides housing assistance to veterans experiencing chronic homelessness, was introduced as a pilot program in 2015, and only 26 Tribes were initially invited to participate in the program. On January 15, 2021, HUD published a Notice of Funding Availability (NOFA) that explained that \$3.2 million in additional competitive grant funds from a prior fiscal year would be made available to existing participants in the program and to eligible new participants, which represented the first potential expansion of the number of Tribes participating in this program.

Other

Two potentially underutilized programs for housing-related projects are HUD's Training & Technical Assistance (T&TA) program and its Section 4 Capacity-Building for Community Development and Affordable Housing program. These funding sources can be used to train boards and staff, obtain assistance with pre-development and design for housing development projects, and develop a better understanding of LIHTC, leveraging, and other funding options for housing. Capacity-building grants can also be used to help address staff turnover or to train staff on new software or other tools.

Human resources and internal capacity

Addressing staff turnover

When asked how TDHEs could better weather staff turnover in leadership, stakeholders across the board suggested cross training support staff. A stable and long-standing team of support staff can protect the stability of a department and help bring a new director up to speed on longer-term projects and goals, without starting from square one with each change in leadership. The complex array of funding mechanisms from different sources, which each come with their own set of compliance requirements and use restrictions, can take years of experience, education, and teamwork to master. On-the-ground experience is the best way to understand how to work with and leverage each funding source.

Many conversations in the focus groups and interviews focused the siloed nature of working relationships across Tribes, their housing entities, and government or funding agencies, as well as how providing consistent learning and training opportunities to bring new staff members up to speed as efficiently as possible. For Tribes and TDHEs, this means providing new staff members with education and training on specific complex federal and state funding mechanisms and associated compliance. For example, new staff members could receive HUD grant training or training regarding Low-Income Housing Tax Credits or Title VI, because these funding opportunities require substantial background knowledge. On the agency side, training and education of agency staff needs to focus on the unique aspects of Tribal sovereignty, how to properly work with sovereign Tribal nations with unique and important cultural differences on a government-to-government basis, and, at a more basic level, the importance of involving Tribes in programs or planning efforts.

Collaboration

Many Tribes and TDHEs have been able to overcome issues of capacity through strategic partnerships and collaborations. Organizations such as Northwest Indian Housing Association (NWIHA)¹⁸⁹ bring together

¹⁸⁸ Housing Market Snapshot: State of Washington and Counties, Third Quarter 2020

¹⁸⁹ <http://www.nwiha.org/>

housing authority directors from across the Northwest to share resources, experience, and training opportunities. Regional meetings provide opportunities for peer-to-peer networking and allow for easier partnerships and resource sharing.

A recent leadership cohort was created with the help of a community development consultant for coastal Northwest Tribes through a project funded by the HUD Northwest Office of Native American Programs (NwONAP) and Northwest Indian Housing Association (NWIHA). The cohort members attended organizational capacity-building training, explored best practices, and received executive coaching. While the cohort was a unique training and technical assistance opportunity, it presents a creative approach to regional collaborations, and NwONAP is exploring opportunities to replicate it.

Another example of regional collaboration was noted by participants in the Eastern Washington focus group, where several Tribes are discussing plans to develop an urban Native village in Spokane that would provide housing, services, and a cultural and community space for Native people who live in or around the Spokane area. Urban development on this scale would be difficult for a single Tribe to attempt on its own. Tribes in California and Alaska have collaborated by forming consortiums of Tribes to pool funds and create an economy of scale to facilitate larger projects. For example, a consortium of 12 Tribes in Southern California formed a housing authority.¹⁹⁰ Washington has a similar consortium of Tribes operating together as the South Puget Sound Intertribal Housing Authority. The South Puget Intertribal Planning Agency is a consortium of five western Washington Tribes that collaborate on issues such as health care, food distribution, child welfare, and workforce development.¹⁹¹

Partnerships and collaborations between Tribes and nearby counties can also be successful. Puyallup and Muckleshoot have collaborated with county governments on a number of issues ranging from planning to homelessness. For example, non-subsidized, non-Formula Current Assisted Stock NAHASDA units are eligible for use in the HUD-VASH and Housing Choice Voucher programs, if counties or nonprofits provide the vouchers or assistance, a collaboration that both Puyallup and Muckleshoot have entered into with their respective neighboring county governments. Kitsap County gave the Port Gamble S'Klallam Tribe a portion of the county's COVID-19 response fund allocation in recognition of the interconnectedness of their communities and lands. The Quileute Tribe recently worked with the town of Forks on a broadband expansion initiative, and Jamestown S'Klallam created a partnership with Sequim, in which the Tribe tapped into the city's wastewater system to lower infrastructure costs.

Digital platforms and COVID-19

While the COVID-19 pandemic has been especially devastating to Tribes and Native communities, the shift to digital platforms has benefits that will last beyond pandemic-related quarantines and in-person meeting restrictions. Many Tribes updated their digital platforms out of necessity, including making remote work accessible for Tribal employees, creating systems for online rent payment and service requests, and using CARES Act funding to purchase new software to track and better manage their housing and other resources, such as Housing Data Systems (HDS) software, which is used by many Tribal and public housing authorities. Regional and national meetings shifted to virtual platforms, which created greater accessibility for people who may not have been able to attend due to the burden of cost or travel time. Many meetings, such as National American Indian Housing Council's (NAIHC) annual Legal Symposium, plan continue offering these events remotely even after the pandemic subsides due to the success of the digital format. These digital evolutions

¹⁹⁰ All Mission Indian Housing Authority (<http://www.amiha.org/>)

¹⁹¹ South Puget Sound Intertribal Planning Agency (<https://www.spipa.org/>)

can further streamline housing organizations, lower administrative costs, and create more employee-friendly or accessible working arrangements.

Housing development opportunities

The survey for Tribal housing providers asked TDHEs to select features they would like prioritized in new housing developments. Of the 15 responding TDHEs, the most popular priority (cited by 10 THDEs) was culturally responsive planning and design. This focus mirrors the priority identified by urban Native housing providers. The design of a housing structure is vitally important in making the occupant feel safe, comfortable, and able to access necessary amenities. Other priorities selected by housing providers were energy efficiency (nine), long-term cost-effectiveness (six), multi-generational housing (six), walkability and access to public transportation (five), and ADA accessibility (five). Tribes and TDHEs can help address these priorities with the help of experienced consultants, building dense housing, and following examples of prior successful projects.

Consultants

Consultants can play an important role in helping Native organizations develop long-term strategies for new housing development and typically have the knowledge and experience to leverage complex funding mechanisms. Many Washington Tribes utilize the expertise of consultants, noting that professional resources can supplement capacity, help fund projects, and save money in the long run. Muckleshoot, for example, was able to develop supportive housing using an array of Native and non-Native funding sources by engaging a consultant that specializes in designing and developing supportive housing projects.

Consultants are also heavily used by LIHTC, a program with a steep learning curve that requires LIHTC experience to utilize. Many Tribes noted they use an experienced consultant such as RTHawk or Travois for their first LIHTC project, and may use that as a learning opportunity for staff members to familiarize themselves with the program and its compliance requirements and restrictions. Lawyers familiar with Tribal housing and LIHTC can also serve as an important asset in helping a housing authority new to LIHTC understand the unique partnership and ownership structures and program compliance requirements and navigate the extensive documentation.

Density

Many Tribes, including Squaxin and Lummi, invested resources into building tiny homes to quickly house vulnerable populations. The COVID-19 pandemic made tiny homes an efficient way to provide safe and sanitary transitional housing and to reduce the risk of possible exposure that arises when people are staying in shelters or overcrowded living spaces. Lummi Stepping Stones is a non-profit organization whose mission is to build tiny homes to house community members experiencing homelessness.¹⁹²

Examples of successful projects

Many focus groups and interview participants identified Makah Tribe's Sail River Heights as an example of a successful housing development project. Sail River Heights is a permanent supportive housing complex that includes 72 owner-occupied single-family homes, 16 market-rate rental apartments, and 21 affordable housing units for families and individuals experiencing homelessness, as well as a courtyard and community center. The complex is near the Tribal wellness center. Sail River Heights was funded through a combination of LIHTC, Washington State Housing Trust Fund, Federal Home Loan Bank, and Tribal resources through an operating subsidy and IHBG funding.¹⁹³

¹⁹² Lummi Stepping Stones, <http://lummisteppingstones.org/>

¹⁹³ Peninsula Daily News, 2014

The Place of Hidden Waters housing development completed by the Puyallup Tribe of Indians is an excellent example of attached single-family housing. Townhouse clusters were designed to emulate traditional Coastal Salish longhouses, with other culturally significant site features such as a community hearth, dance arbor, and sweat lodge area. The integrative design process involved community members to help determine a type of multifamily housing that could build a sense of community while giving residents privacy.

A Jamestown S'Klallam housing staff member also noted in a focus group that the process of completing a housing study enabled them to work with an architect and other contractors to explore new and innovative housing design and development options, as well as potential partnerships with external service providers, underscoring the importance of pre-project planning and data collection.

Muckleshoot Housing Authority collaborates with the Muckleshoot Behavioral Health program to offer residential mental health services to Tribal members. The collaboration between Tribal programs has resulted in an Adult Recovery House, a clean and sober recovery home for women and their children called Lily House, a clean and sober recovery home for men called Red Cedar House, and the recently added Butterfly House, another clean and sober recovery house for women. The housing authority implemented occupancy policies that encourage drug-free housing and provide housing participants the opportunity to engage in treatment services rather than being evicted. The Behavioral Health Program provides assessments and ongoing behavioral health services to referred clients. Housing acts as a monitoring agency, receiving monthly progress reports and ensuring clients in need of behavioral health services engage as recommended. This relationship has grown over the years and now includes emergent housing opportunities to support clients in recovery who reach the end of their allotted time in a Recovery Home.

Homeownership

Appraisals

In order to avoid Appraisal and Valuation Services Office (AVSO) delays in land valuations, Tribes can establish a contract with DOI and BIA to conduct the services previously provided by the DOI's AVSO, which allows the Tribe to contract directly with private appraisers to limit wait times for appraisals and enables the Tribe to generate revenue from its work as a contractor for DOI. Additionally, appraisals can be used to help stimulate the housing market on Tribal lands and ensure that buyers and sellers are reaching a fair price for housing.

Title status report process through BIA

Ten Tribes nationwide, including the Confederated Tribes of the Colville Reservation in Washington, have established their own Tribal Land Titles and Records Office (LTRO) that allows them to issue TSRs more quickly relying on the BIA's regional LTRO. This avoids jeopardizing loan guarantees and bolsters the housing market. These Tribal LTROs contract with the BIA and DOI, also providing revenue for the housing authority.

Financing and lending

A number of activities to improve the mortgage lending process are underway, such as efforts by HUD and BIA to improve TSR processing and the passage of the Helping Expedite and Advance Responsible Tribal Home Ownership Act in 2012, which created a voluntary alternative land leasing process. Lenders support these efforts and suggest the need to assure effective implementation through ongoing interagency collaboration and technical assistance to Tribes regarding land titling and leasing.

Lenders also reported that pre-purchase homebuyer, credit, and other counseling, particularly counseling provided by organizations familiar with the unique challenges of lending on Tribal trust land, are critical to getting borrowers mortgage ready. Moreover, down payment assistance programs can help borrowers with

insufficient savings to qualify for Section 184 program loans. Lenders interviewed for the study supported the promotion of financial counseling in Tribal areas.

A successful USDA Section 502 relending pilot program in South Dakota and North Dakota presents an opportunity to increase homeownership on Tribal lands. The pilot program launched in 2018 through a collaboration between USDA Rural Development and two Native CDFIs in South Dakota. The two South Dakota CDFIs are now eligible lenders under Section 502, and each received Section 502 direct loan funding with a low interest rate and 20% in matching funds to be used to relend to Native American families in South Dakota and North Dakota to help allow more families to qualify for Section 502 loans. The South Dakota Homeownership Coalition is advocating for using this model as a way to increase access to USDA home loan programs for Native families.¹⁹⁴

Some Washington Tribes have also been successful at developing their own homeownership programs. The Muckleshoot Indian Tribe has a homeownership program in which the Tribe finances a 1% interest loan to Tribal members purchasing land within a 30-mile radius. The program, while successful, may not be applicable or appropriate for all Tribes.¹⁹⁵ The Tulalip Tribes also have a successful homeownership program; the Tribe builds homes and sells them to Tribal members using Section 184 loans, and provides homeownership and homebuyer readiness classes.¹⁹⁶ A focus group participant familiar with the program reported that Tribal members who have become first-time homeowners using the program are beginning to resell those homes to other Tribal members, creating a local and accessible housing market.

Specific opportunities based on Tribal characteristics

Small Tribes

See the Collaboration section of this document for opportunities helpful to small Tribes.

Coastal Tribes

Coastal and peninsula Tribes have come up with creative ways to overcome their significant barriers to housing development. In particular, establishing partnerships between coastal Tribes was mentioned as an opportunity for this regional group to collectively take action. For example, if a number of Tribes in the region were to package all of their construction projects into a single RFP, it may help entice contractors into the area by ensuring they have enough work to make the trip to the peninsula worthwhile. Similarly, the cost of building materials could be lowered by ordering in bulk for multiple projects. Some Tribes in remote areas have established education programs to build their own contracting and construction teams, referred to as force account teams, which could potentially serve multiple Tribal areas. A number of peninsula Tribes have also worked with or have begun to consider home building programs similar to Habitat for Humanity. One focus group participant spoke of his experience trying to work with Habitat for Humanity but ultimately ran into issues related to trust land; the Habitat for Humanity organization requires that their name be on the land title, which is not possible with trust land. Instead, this innovative director created his own local version of Habitat for Humanity, replicating their model into something that could work with the unique aspects of trust land. Peninsula Tribes have also been creative in trying new types of housing, including applying for a grant that would pay for an energy-efficient model home to be built with recycled material from airplanes.¹⁹⁷ The Tribe did not ultimately receive the grant, but these ideas present future opportunities and direction. A number of Tribes

¹⁹⁴ South Dakota Native Homeownership Coalition, 2018

¹⁹⁵ Muckleshoot Indian Tribe, n.d.

¹⁹⁶ Ibid.

¹⁹⁷ Composites Recycling Technology Center (<https://www.compositerecycling.org/>)

also mentioned partnerships with OlyCap (Olympic Community Action Programs), a nonprofit that helps low-income families find housing and obtain social services.

Eastern Washington/Columbia River Tribes

See the section above for a discussion of an urban Native village concept in Spokane.

Urban Native housing

Native people living in urban areas in Washington face challenges of affordability and availability of housing, conditions that have been further stressed by economic growth in urban areas, the limited resources of urban housing and support service providers, and the COVID-19 pandemic.

Economic conditions

The urban areas of Washington, and specifically Seattle, have seen huge economic growth in recent years, in large part due to the booming technology industry. Companies such as Boeing, Microsoft, Nordstrom, and REI have long contributed to the economic growth of Washington as a whole, while the recent tech boom brought Amazon and other technology companies to the forefront of the American economy in general. Due to the high concentration of technology companies and startups based in the Seattle metropolitan area, the cost of living has increased substantially in recent years, making Seattle one of the most expensive cities in the country and even the world. A recent Bureau of Economic Analysis report measuring the relative value of \$100 showed that, in the Seattle-Tacoma-Bellevue Metropolitan area, \$100 of goods and services has a real worth of only \$88.57, whereas non-metropolitan areas of Eastern Washington had a real worth of over \$103.¹⁹⁸

This economic growth has not been shared by many already struggling urban communities,¹⁹⁹ including Native people who live in Washington's urban areas. The pace of economic growth in Washington's urban areas has exacerbated existing wealth gaps, creating an unprecedented homelessness crisis and the rapid displacement of communities of color. Urban Native people, who already experience higher rates of homelessness, poverty, and negative health outcomes than other groups, have largely been left out of this economic boom. Nationally, 28% of single-race urban American Indian/Alaska Native individuals live under the poverty line, compared to 9.5% for urban non-Hispanic whites.²⁰⁰ Additionally, as previously mentioned, the median AIAN household in Washington earns approximately \$25,000 less annually than the median Washington household, and the median Native Hawaiian and Pacific Islander (NHPI) household in Washington earns approximately \$5,000 less than the median Washington household. According to the most recent Point-in-Time Count of homeless persons, while American Indian and Alaska Native people make up only 1% of the population of King County, where Seattle is located, they make up 15% of the population of people experiencing homelessness (All Home King County, 2020). Other urban areas are experiencing similar racial disparities in their homelessness; for example, in Pierce County, 1% of the population identifies as AIAN, while 5% of the homeless persons counted reported being AIAN.²⁰¹ In Spokane County, 2.4% of individuals are AIAN or NHPI, and these individuals account for 17% of the homeless population.²⁰²

Data from the U.S. Department of Housing and Urban Development (HUD) shows that 2% of households in Washington receiving assistance under three different categories of HUD programs (including public housing,

¹⁹⁸ Watson G. , 2020

¹⁹⁹ Eckart, 2019

²⁰⁰ Urban Indian Health Institute, 2016

²⁰¹ Pierce County Human Services, 2020

²⁰² Spokane City/County Continuum of Care Board, 2020

tenant-based and privately-owned housing, and project-based housing) were AIAN.²⁰³ This does not account for those served under non-HUD programs (which does not include IHBG funding). Based on the number of households served in the state, this is estimated to be approximately 1,750 AIAN households. Housing choice vouchers account for the largest proportion of AIAN households served by non-IHBG funding, followed by project-based Section 8 and HUD-funded Public Housing programs (see Table 18).

Table 18: Number of Washington households served by HUD, 2019

HUD programs	Total number of Washington households served	Estimated Native American households served
Public housing	10,602	212 (2%)
Housing Choice Vouchers	58,781	1,176 (2%)
Moderate rehabilitation program	650	26 (4%)
Project-Based Section 8	14,447	289 (2%)
Totals	87,561	1,751 (2%)

Source: HUD Picture of Subsidized Housing, 2019

Needs

Addressing homelessness and providing short-term and transitional housing alongside social services was consistently stated as the highest need, as a disproportionately large number of AIAN and NHPs experience homelessness in urban areas. The population density of urban areas and a lack of affordable housing options have led to a homelessness crisis in Washington’s urban areas. King County declared a state of emergency due to homelessness in 2015, and cities such as Tacoma and Spokane are also experiencing acute levels of homelessness. In addition to homelessness, the housing that AIANs and Native Hawaiians inhabit is less likely to be “adequate,” according to both national-level data and data describing the housing conditions of those living in the Seattle-Tacoma-Bellevue-Metropolitan Statistical Area (Seattle MSA).

Urban Native housing providers and the consultants and architects who work with them noted the importance of culturally appropriate building and program design when it comes to developing supportive or transitional housing. Supportive housing, or affordable housing that is combined with coordinated services in order to increase access to these services while providing and maintaining stable housing, has shown to be an effective strategy. Multiple participants in the advisory group focus group noted the importance of the design of these supportive housing environments. The question “What is going to make this building safe and secure?” must be answered through a cultural lens specific to Native communities so that the space itself does not add to the trauma of residents who are in a healing and recovery process. Multiple service providers and consultants noted that creating an intentional cultural community is a key aspect of the success of supportive housing projects. For many Native providers, this intentional cultural community centers around a mix of Native healing, art, cultural practice, and other related traditions of Native populations served by providers, such as healing circles, canoe journeys, and traditional foods. In addition, consultants noted the

²⁰³ HUD Office of Policy Development and Research, 2020

successes of involving service providers in the design process for supportive housing developments so that the building and services offered within are designed in tandem to be easily accessible and navigable.

While short-term housing solutions are needed to address acute homelessness and housing instability issues, long-term and permanent housing solutions were also referenced as highly needed for the community. Often, funding opportunities dictate which type of housing need will be prioritized by urban housing providers. Focus group and interview participants noted that their emphasis on homelessness and transitional housing is due to a combination of high acute need as well as the availability of funding sources for those projects.

Additionally, as previously mentioned, American Housing Survey data from 2019 show that AIAN and NHPI households in the Seattle MSA were less likely to live in adequate housing compared to the MSA overall.²⁰⁴ This included issues with lack of adequate heating, electricity issues with fuses, and water leaks from outside and inside the home. However, much of the data describing housing inadequacies is limited due to a small sample population of AIANs and NHPIs in the area. In order to more fully understand these inadequacies at the Seattle MSA level and to report information at the state level, it would be necessary to expand the sample size so that the AHS can better describe the disproportionately inadequate housing conditions that minority groups, including AIANs and NHPIs, are experiencing.

Barriers

Funding constraints

Urban Native organizations lack a dedicated funding stream focused on addressing the unique needs of their community members. Funding constraints, in terms of eligible applicants/recipients and eligible activities or uses of the funds, pose challenges to the development of supportive housing. Many of the available funding mechanisms for housing are one-time grants or are restrictive with respect to how and when money can be used. Developing supportive housing typically requires leveraging several funding sources, including separate funding for service providers and the maintenance and operations of both the building and the services. Combining funding sources in a consistent and sustainable way to accommodate and adapt to specific and separate deadlines, reporting requirements, and restrictions concerning who can be served can be difficult or even unattainable.

Native preference

Federal funding for Native housing that does not come through Tribes for the purpose of serving Tribal members must comply with the Fair Housing Act, which means that urban Native providers are unable to prioritize housing Native people over other demographic groups that apply for housing or services. For service organizations created for the purpose of serving the Native community, these restrictions make it difficult to target resources to fully and efficiently serve the intended recipients of their services. These organizations must focus heavily on targeted marketing to organically attract more Native people to their services.

Native people experiencing homelessness also are limited in their ability to prioritize receiving services from Native service organizations when going through the Coordinated Entry process, which may prevent Native people experiencing homelessness from taking the assessment. As mentioned previously, many urban Natives have suffered trauma at the hands of government institutions and may not feel safe using these systems to access services.

²⁰⁴ U.S. Census Bureau, 2019

Support for middle-income households

Rising costs of living in urban areas have also increased the number of people whose household incomes make them ineligible for services restricted to low-income households but who still need access to free or affordable services. Many federal funding mechanisms are targeted toward or restricted to low-income individuals and families, which leaves middle-income families without access to affordable housing and other assistance.

Access to funding mechanisms

Urban Native service providers lack direct access to common funding sources that local public housing authorities or TDHEs may have access to, and this lack of access is a significant barrier to housing vulnerable Native community members. Housing choice vouchers (formerly Section 8) are only available to public housing agencies and cannot be issued by nonprofit service providers.²⁰⁵ Many urban Native persons who are eligible for the housing choice voucher program do not feel safe or comfortable using local public housing authorities to access vouchers and may experience racism²⁰⁶ or other discrimination from landlords²⁰⁷ when using the vouchers to find and secure fair market rentals.

Similar safety issues were brought up as the primary reason why many of Seattle's urban Native nonprofits did not historically participate in the local Homeless Management Information System (HMIS), a database used by service agencies to report data on how their services are used and by whom. Often, the trauma Native people have experienced at the hands of the U.S. government prevents those seeking services from utilizing government aid, and many do not want to share their confidential data with government agencies (Echohawk, 2018). A primary source of information for the PIT Count of sheltered homeless persons comes from data entered into and stored in the HMIS database. PIT Counts are used to determine the amount of funding allocated by HUD to the local Continuum of Care (CoC) organization. By declining participation in HMIS, the CoC funding did not reflect the high rates of homelessness experienced by AIANs.

Urban Native organizations in Seattle have advocated for important changes to HMIS, and they now use HMIS and have representation on the CoC board (see Opportunities section). Nonetheless, these organizations noted that there are still many issues that need to be addressed concerning the systems in place in urban areas that deal with homelessness. For example, each CoC region can set its own priorities in terms of how services are accessed and by whom. King County uses the Vulnerability Index-Service Prioritization and Decision Assistance Tool (VI-PDAT). The tool frequently underscores Native persons, likely due to AIAN distrust of government systems, which leads to dishonest or incomplete responses to the screening tool questions.

Housing development

A lack of funding and limited housing development experience are significant roadblocks to getting new housing projects off the ground, especially in dense urban areas. Urban development projects require a delicate balance of public and private financing, each of which comes with its own restrictions and requirements. As urban providers mentioned during focus groups, combining various funding sources successfully takes a person with a master's level business or real estate background, and the learning curve is steep even for someone well-equipped to implement a complex housing project plan. Most urban Native organizations and service providers are new to the realm of housing development. In the case of Chief Seattle Club, strong leadership, fundraising skills, and the aid of a development nonprofit enabled the club to overcome its initial lack of experience. While this speaks to the strength of the organization and its committed

²⁰⁵ U.S. Department of Housing and Urban Development, n.d.

²⁰⁶ Long, 2020

²⁰⁷ Beekman, 2016

community of staff and donors, this type of leadership and strong donor base is not ubiquitous and should not be a precursor to a successful development project. Interview participants familiar with housing development noted that the industry is dominated by white culture, not very inclusive, and is built on access and connection to the finance, property management, and real estate worlds. Often, investors, lenders, and contractors are hesitant to work with organizations that are less experienced or have limited balance sheets, and these non-Native entities may not understand the priorities of Native people and organizations. In addition to the hardships faced by urban-based nonprofits in attracting developers and investors, the type of project that the Native organizations can develop or implement remains at the mercy of the specific government or philanthropic funding mechanisms that are available and accessible at the time, rather than being driven and informed by community need.

Urban affordable housing developments often face pushback from residents, especially in higher-income areas. This “Not In My Back Yard” (NIMBY) reaction to a potential influx of low-income residents can result in lawsuits aimed at preventing development, such as the lawsuit from residents currently being faced by United Indians of All Tribes in the redevelopment of Fort Lawton, which would bring affordable housing for Native people to the West Magnolia area of Seattle. West Magnolia is a neighborhood within the 98199 Zip Code Tabulation Area that is 81% white (single race) and has a median household income of \$114,551 (ACS 2019, 5-Year Estimates). The Seattle Indian Health Board (SIHB) is facing similar pushback in their search for a new location for the Thunderbird Treatment Center, an inpatient substance use disorder treatment center. The building where the facility is currently located is in disrepair, and the cost of repair or rebuilding was not feasible, leading SIHB to sell the building. However, SIHB is finding it difficult to find a new location for the treatment center due to pushback from communities that do not want a treatment facility in their neighborhood.

Location of services

While Native-led or Native-focused organizations that provide housing services are present in some urban areas, such as Seattle, Native-oriented services are less accessible or even non-existent in other urban areas in Washington. Most of these organizations, including Chief Seattle Club, Mother Nation, Seattle Indian Health Board, and United Indians of All Tribes Foundation, are based in the urban core of Seattle and King County. Some Seattle-based organizations serve a wide geographic area; Mother Nation, while focusing on King and Snohomish Counties, serves all of Western Washington and, in some cases, Eastern Washington. Native-oriented social service organizations exist in other urban areas like Tacoma (Tahoma Indian Center) and Spokane (The NATIVE Project), but there are fewer Native-specific resources, which means Native people must also rely heavily on social services provided to the general public. Religious service organizations, such as Catholic Community Services and Tacoma Rescue Mission, are often the primary providers of housing services to Native people in these areas. Many of these philanthropic organizations have put special effort into recruiting Native program staff in order to create a more inclusive and welcoming environment.

Rising costs in urban areas have created barriers to accessing services in city centers, where the majority of service organizations are located. Focus group members and interview subjects noted that many members of urban Native communities have been pushed to the outskirts of cities and counties as gentrification has rapidly displaced communities of color. Urban providers in focus groups and interviews noted that their location in downtown areas can make it difficult for clients to access their facilities, as the costs of public transportation, parking, gas, and tolls contribute to the overall financial impact of accessing basic and vital services, and commute times can be long and difficult for clients to manage alongside childcare or employment.

Opportunities/developments

Collaborations

Partnerships with Tribes

Native housing providers in Washington are exploring partnering with Tribes to provide housing for Native Tribal members. Urban organizations are not eligible for most federal funding intended for Native people, which is generally reserved for Indian Tribes officially recognized by the federal government. However, urban Native organizations can partner with a Tribe to access some of their Native American Housing Assistance and Self-Determination Act (NAHASDA) funds in order to house or provide housing services to members of that Tribe or members of other federally recognized Tribes, for example. In this way, Native nonprofits are not subject to restrictions concerning racial preference, as NAHASDA funds are specifically allocated to Tribes to serve their members or members of other federally recognized Tribes.

This model has been applied in urban areas that are relatively close to reservations, as many Tribal members opt to live near but not on reservations due to the accessibility of jobs and availability of additional housing options. A recent collaboration between the Confederated Tribes of Siletz Indians and the non-profit Native American Youth and Family Center (NAYA) created 59 new units of affordable housing in Portland, Oregon. This partnership between an urban Native organization and a Tribe was cited often in research as a model project, because it allowed for funds from the Tribe's IHBG funding to be used to build and operate a portion of affordable housing units in an urban area that prioritizes Tribal members and other Native people. The project, called Nesika Illahee, offers behavioral health, dental, and recovery services and provides additional services at the nearby NAYA Center building.

Tribes partnering with urban organizations to house their members is an opportunity worth exploring for many Tribes who have a critical mass of members in a particular city, but also touches upon a historical tension between urban Native organizations and Tribes. Due to the declining buying power of IHBG funding, many Tribes do not have the resources to support members who live off-reservation, and Tribes fear their funding may decline further if urban organizations start vying for Tribal resources. Urban Native organizations acknowledged this concern and noted that they wanted to develop funding solutions that did not disrupt or diminish existing Tribal housing funding.

Urban confer

Urban Indian Health Programs (UIHP) developed a mechanism called Urban Confer, which provides for an exchange of information between government agencies and UIHPs such as the Seattle Indian Health Board. The Seattle Indian Health Board is advocating, among other things, for an Urban Confer policy to be implemented between government agencies and departments within each HHS jurisdiction in order to better serve the urban Native community.²⁰⁸

Collaborations with other communities

Many urban Native organizations noted that they look to the Black and Asian communities, which have been successful in building community through outreach and marketing. Urban Native organizations need targeted marketing that operates within the confines of the Fair Housing Act in order to develop racially cohesive communities within the constraints of applicable housing law. In a focus group, staff from Native urban organizations said their organizations frequently collaborate with Black and Asian communities to combine and streamline activism efforts and to benefit from the visibility of these communities' larger populations and

²⁰⁸ Lucero, 2019; Seattle Indian Health Board, 2021

previous successes. The recent focus on BIPOC (Black, Indigenous and People of Color) identity has furthered the solidarity and collaborations between Black and Indigenous organizations, which focus on collectively uplifting two of the most historically marginalized populations in the U.S. and acknowledging their shared history of experiencing cultural and systemic racism, violence, and abuse.²⁰⁹

Funding

Philanthropic organizations and foundations can offer an important funding source for urban organizations, who typically are not eligible for Tribal funding as non-Tribal entities. Enterprise Community Partners is one such philanthropic organization. Enterprise's Home and Hope program is open to nonprofits as well as Tribes,²¹⁰ and Enterprise is an administrator of HUD's Section 4 Capacity Building Grant, which is open to community development corporations and community housing development organizations.²¹¹

Addressing urban Native homelessness

Native people experience urban homelessness at higher rates than other racial and ethnic groups, as illustrated in the King County Point-in-Time (PIT) Count numbers from King County and Washington from the most recently available years. There are numerous organizations in King County that seek to address or reduce Native homelessness, including Chief Seattle Club, the local chapter of the National Coalition to End Urban Indigenous Homelessness, Seattle Indian Health Board, Catholic Community Services, Seattle Indian Services Commission, Mother Nation, Cowlitz Tribal Health Seattle, Tlingit & Haida Washington Chapter, United Indians of All Tribes Foundation, Na'ah Illahee Fund, and the Native Action Network. In Washington's other urban areas, there are fewer Native-specific service organizations, and Native people experiencing homelessness can only access services available to the general public, often through religious service organizations like Catholic Community Services or area-specific entities like Tacoma Rescue Mission.

[Spirit Journey House](#) is a transitional housing program for Native women experiencing homelessness and recovering from substance abuse. The program was a pilot project of Catholic Community Services and is the first urban Recovery House with a full Native cultural program. Spirit Journey House offers a variety of cultural programming integral to the transition from homelessness to housing, including weekly talking circles, sweat lodges, and a Native 12 step AA program. [Mother Nation](#) has a cultural response team of traditional Elders and staff and uses cultural programming to support residents in their transition into stable housing.

In late 2019, Chief Seattle Club opened Eagle Village, King County's first modular housing project.²¹² This pilot project used shipping containers to create dormitory-style bridge housing focused on helping Native American and Alaska Native people transition from homelessness to permanent housing. Chief Seattle Club wanted to provide a temporary safe and secure housing environment for Native people that includes a sense of community, support, and healing through an Indigenous lens. Programming at Eagle Village centers traditional cultural activities, and the development is located close enough to Chief Seattle Club's primary building in order to allow access to their day center and other services. In response to the COVID-19 pandemic, King County added five tiny homes to the site to quarantine Native elders and other vulnerable community members experiencing homelessness, according to staff members in study interviews. Chief Seattle Club housed additional elders and other community members in hotel rooms and began a grocery delivery program to serve community members during pandemic-related lockdown and quarantine periods.

²⁰⁹ Belfi, 2020

²¹⁰ Enterprise Home and Hope, <https://www.enterprisecommunity.org/where-we-work/pacific-northwest/home-hope>

²¹¹ HUD Section 4 Capacity Building, <https://www.hudexchange.info/programs/section-4-capacity-building/>

²¹² Chief Seattle Club, 2020

In response to the COVID-19 pandemic, the City of Seattle's Office of Housing appropriated funds from the Seattle Housing Levy in order to build Sacred Medicine House, a permanent supportive housing development to be built in the Lake City neighborhood of Seattle.²¹³ Service providers for the housing project include Chief Seattle Club and other non-Native housing and service providers, including the Downtown Emergency Service Center (DESC).

Successful housing models

As noted, community is a key aspect of ensuring resiliency and lifting people out of cycles of homelessness. Urban providers do not want short-term housing to be the solution but noted that it is difficult to prioritize long-term housing when homelessness is the most acute issue facing urban Natives. Many urban organizations have collaborated to ensure that, given limited funding, necessary services are provided with as few overlaps or redundancies as possible. The Seattle Indian Services Commission has historically focused on family housing, while Chief Seattle Club has centered on adult homelessness, and Mother Nation directs its efforts to uplift women and provide services to survivors of gender-based violence. The Seattle Indian Health Board has developed plans for constructing affordable housing units in the same building as its clinical services facilities.

United Indians is seeking to redevelop Fort Lawton in Seattle into mixed-income housing with recreation space and supportive services.²¹⁴ They are collaborating with the Seattle Indian Services Commission, Catholic Community Services, and the City of Seattle on plans for a building that will contain 238 mixed-use affordable housing units, including 85 supportive housing units for elders who have experienced homelessness and 150 townhouses for families. The redevelopment comes after over a decade of advocacy work and dialogue between United Indians of All Tribes, Catholic Housing Services, and other community partners and organizations and is the culmination of Bernie Whitebear's dream born out of the 1970 occupation and reclaiming of Fort Lawton.

United Indians of All Tribes established a demonstration project in 1992 for youth "bridge" housing, which combines temporary crisis housing with wraparound services. The project sought to move clients as quickly as possible out of temporary housing into rent-subsidized apartments, where youth still have access to supportive services as they transition into more permanent housing and their rent subsidies are gradually reduced until they are ready to pay rent on their own. This model has proven successful in stopping the cycle of homelessness and providing support that extends beyond just emergency services.²¹⁵

Chief Seattle Club is currently developing an eight-story affordable housing complex next to their current building in the Pioneer Square neighborhood of Seattle. The project, named *ʔálʔal*,²¹⁶ will include 60 units for housing people experiencing homelessness, with an additional 20 affordable housing units.²¹⁷ The building will include program space for Chief Seattle Club, a primary care health clinic and pharmacy operated by Seattle Indian Health Board, and a café with gallery space to showcase Chief Seattle Club's Native Works art program. *ʔálʔal* will also showcase a variety of Native art throughout the building. This collaborative affordable housing project is funded through a combination of sources, including Low-Income Housing Tax Credits, Federal Home Loan Bank products, a variety of city, county, and state funding, as well as a capital campaign. The project is being developed using a variety of non-Native partnerships, including the affordable housing firm Beacon Development, Jones & Jones Architects, and Walsh Construction.

²¹³ Stiles, 2020

²¹⁴ United Indians of All Tribes Foundation, 2019

²¹⁵ Seattle City Council Insight, 2018

²¹⁶ "Home" in Lushootseed

²¹⁷ Chief Seattle Club, 2020

In addition to building Native-specific housing developments, more housing construction generally, especially multiplex housing, condominiums and accessory dwelling units (ADUs), can increase the supply of housing and consequently lower housing prices and increase affordability in urban areas statewide. Some cities across the U.S., including Minneapolis and Berkeley, have eliminated or are eliminating exclusionary single-family zoning policies, which have resulted in racial and economic segregation, to allow for the development of denser housing, which can potentially lower housing prices and lead to more diverse neighborhoods and home purchasing opportunities for middle and low-income households.²¹⁸

Data

In an effort to combat the lack of available data about Native people in urban areas, the National Coalition to End Urban Indigenous Homelessness, a national urban Native advocacy group based in Seattle, is seeking funding to conduct a national research project that will help the Coalition quantify and better describe populations of urban Natives. As noted in the discussion of the Point-in-Time Count, the HMIS update in King County that added individual Tribal designation to the list of data collected was one local achievement of the Seattle-based chapter of the Coalition, but they also conduct projects and advocacy at the national scale. The inclusion of Tribal affiliation data in HMIS has important impacts on understanding how Native people experiencing homelessness access and utilize resources, and this adjustment could potentially be replicated in other counties. Statewide data on Native homelessness allows the Department of Commerce and other state agencies to apply a racial equity lens to the performance of participating entities and their own programs. Tribal designations also offer an opportunity to understand which urban Tribal members are served by urban organizations. Understanding who accesses services and where they access them has the potential to impact funding from Tribes, state agencies, and philanthropic organizations.

COVID-19 update

The COVID-19 pandemic significantly impacted urban Native communities in Washington. American Indian and Alaska Native people already made up 15% of the homeless population of King County prior to the onset of the pandemic. Urban Native organizations like Chief Seattle Club were instrumental in getting the most vulnerable members of the population housed and quarantined in hotel rooms and other emergency housing after the onset of the virus. However, the pandemic is exacerbating other existing disparities. During a focus group for this study, Chief Seattle Club reported a 20% increase in domestic violence calls within Native communities since the pandemic began. Cultural activities, such as canoe journeys, powwows, potlatches and youth camps, which provide community engagement and support, were all canceled or switched to a virtual format in response to the pandemic. Loss of community removes a major source of connection to important resources, including food. AIAN individuals have experienced disproportionately high COVID-19 infection rates, as well as higher mortality rates, in comparison to non-Hispanic whites.²¹⁹ The eventual expiration of Washington's statewide eviction moratorium will significantly impact urban Natives and the organizations who serve them, as the number of Native people experiencing homelessness is predicted to increase.²²⁰

Native Hawaiian communities

Economic conditions

As described earlier, households with Native Hawaiian or Pacific Islander heads of household earn lower median household incomes compared to the rest of the state. In spite of having a higher labor force

²¹⁸ Kahlenberg, 2017

participation rate than the statewide average, households with a Native Hawaiian and Pacific Islander head of household earn lower median incomes, experience higher rates of poverty, and are less likely to be employed in comparison to statewide averages.²²¹

Needs

A primary and basic need for the Native Hawaiian community in Washington is better data that can adequately describe and quantify Native Hawaiian housing needs as a distinct population. Data sources often put Native Hawaiians into the same racial category as Pacific Islanders, and sometimes Asians, Native Hawaiians, and Pacific Islanders all grouped together for reporting purposes, which makes it difficult to find data that describes the needs of just one group. Available ACS data indicate that Native Hawaiians and Pacific Islanders experience low homeownership rates, high rates of homelessness, and a lack of affordable housing for purchase and rent.

In interviews and focus groups conducted as part of this study, Native Hawaiian community members described unmet housing-related needs, including a need for housing that is affordable for younger families who are hoping to live closer to older family members and other community members. Older Native Hawaiians who became homeowners years ago live closer to urban centers, which is less financially feasible for younger generations due to the increased cost of living. Due to lower household incomes, in 11 out of 18 Washington counties with available data, the Housing Affordability Index for Native Hawaiians and Pacific Islanders is under 100, indicating that the median household income cannot afford the median-priced home sold in that county without becoming cost-burdened.²²² Likely due to this mismatch between income and housing costs, there is a wide gap between homeownership rates for the overall population of Washington and for Native Hawaiians: 2019 ACS data show that only 37.1% of Native Hawaiian and Pacific Islander households (with a single-race NHPI head of household) own their home, while 62.9% of Washington households overall own their home. In King County, 76.4% of Native Hawaiians and Pacific Islander households rented, while 43.1% of King County residents at large rented (ACS 2019 5-Year Estimates). As with other minority communities whose members have lower median incomes, Native Hawaiians have faced displacement due to the rapidly increasing housing prices and are more likely to live farther away from expensive city centers.

Barriers

There is little direct or specific support provided to Native Hawaiians outside of Hawaii. Even resources such as scholarships are only available to Hawaiians who live on the islands. Most of the resources available to Native Hawaiians are cultural organizations and civic clubs, where Hawaiians can come together in celebration of traditional foods, music, hula, and language, but these organizations do not provide housing or other services similar to those provided by the other Native organizations in Washington. King County has a high concentration of Native Hawaiians, but rising costs of living have pushed these communities to the fringes of the county. The dispersion of community makes organizing gatherings more difficult, as long or expensive commutes to community events are barriers to participation. A focus group participant said that Native Hawaiians rely heavily on their community for access to resources, including housing. Many Hawaiian families choose to stay with other families in the community rather than attempting to navigate publicly available services like public housing. For kupuna (elders), these community resources are especially important and can serve as access points to other resources. Community and connection through shared cultural history is an

²²¹ U.S. Census Bureau, 2019

²²² Washington Center for Real Estate Research, 2020

important principle for Native Hawaiians, and that priority carries to Native Hawaiian communities on the mainland.

Opportunities/developments

While there are no housing-related service organizations that serve the Native Hawaiian community specifically, urban Native organizations have embraced the Native Hawaiian community by providing many services to them, especially organizations like Chief Seattle Club, whose mission is to serve all people who self-identify as Indigenous regardless of Tribal affiliation. Tribal organizations have also been welcoming to Native Hawaiian organizations and have allowed them to use their gathering spaces for cultural events.

When asked what affordable housing solutions would work best for the Native Hawaiian community in Washington, a focus group participant offered the idea of a “Native Hawaiian neighborhood” complete with services available locally and a community center offering childcare and space for events, gatherings, luaus, and storytelling. This ideal vision of community was compared to the homestead communities on Hawaiian Home Lands in Hawaii, which are lands held in trust for native Hawaiians by the state of Hawaii that are leased to eligible native Hawaiians for the purpose of creating affordable housing and intentional community, as well as farming and ranching.

Homeownership was also brought up as a valuable goal for Native Hawaiian communities. Homeownership in the Seattle MSA is expensive, and many Native Hawaiian families are only able to rent their housing units.

Alaska Native communities

Needs

The data compiled and analyzed for this project, including federal data from HUD, the U.S. Census Bureau and data submitted pursuant to the Home Mortgage Disclosure Act, is collected and reported out using methods that combine data concerning American Indians and Alaska Natives into a single category. As such, many of the needs cited by members of the Alaska Native community in interviews and focus groups mirror the needs of the urban Native community more generally, which includes addressing low homeownership rates, low incomes, high rates of homelessness, and a lack of housing that is affordable to them in Washington. The primary needs identified by focus group members were for health care, financial literacy programs and workshops, and Native-led housing developments that prioritize intentional and supportive communities. Alaska Native focus group members acknowledged that cities do not typically prioritize cultural community in their housing developments, but the recent success of models like Eagle Village demonstrate community as a priority for Native housing. The focus group members noted that shared experiences of Alaska Native transplants, including trauma caused by boarding schools and forced relocation, mean that affinity groups are important to feel safe and secure in housing. In terms of health care, focus group participants reported that most Alaska Native residents of Washington utilize urban Native services for housing and health because they may not have access to on-reservation IHS facilities.

Barriers

Washington has the highest population of Alaska Natives outside of Alaska. Focus group members said that many Alaska Natives moved to the mainland in search of better economic opportunities, education, and medical care. However, moving away from Tribal or village service areas presents barriers to accessing vital services. Tribes typically do not have sufficient resources to provide services to Tribal members who live out of state. Because of the large numbers of Alaska Native people forcibly brought to Seattle in the relocation and boarding school eras, members of the Alaska Native community in Washington said many have intermarried

with members of Washington Tribes and access services through their spouse's Tribal membership. Outside of marrying into one of Washington's Tribes or using urban Native organizations, there are few accessible services for Alaska Natives in Washington. When there is collaboration, it tends to focus on Native advocacy rather than being program- or service-related. Advocacy-related collaborations are also common with Black and Asian communities and organizations, as those communities have more physical representation and higher numbers that allow for resource sharing and visibility that would not be possible otherwise.

Due to the absence of organizations that provide services specifically to Alaska Natives, these communities lean heavily on cultural community and support found through Alaska Native-focused cultural activities. The similarities in cultural practices with some coastal Tribes have encouraged participation by Alaska Natives in local cultural groups, which serve secondary roles providing meals, cultural education, childcare, and community support. Many Alaska Natives rely on urban Native organizations for services. One in five of Chief Seattle Club's clients, for example, are Alaska Native.

Alaska Natives living in Washington can also access limited support from Alaska Native Regional Corporations (ANCs). These corporations were established by the 1971 Alaska Native Claims Settlement Act, which afforded Alaska Natives the right to claim culturally significant lands through title applications submitted by these region-specific corporations.²²³ The corporations, which are separate entities from Tribes and villages, are for-profit entities owned by and serving Alaska Native shareholders, though many have also established non-profit foundations to manage cultural and education programs. ANCs frequently provide direct payouts to their shareholders and offer educational scholarships, internships, wellness and cultural camps for youth, and reimbursements for health care costs. While ANCs serve as an important resource for Alaska Natives who live both inside and outside Alaska, the corporations are required to provide services equally across all shareholders. As a result, housing is not a service that can be provided by the corporations because it is not feasible to provide equal access for all shareholders.

Opportunities/developments

At least one Alaskan Tribe plans to open an office in Washington to address the needs of their large West Coast population, according to an interview participant. Central Council of the Tlingit and Haida Indian Tribes of Alaska, for example, have official chapters in both California and Washington to serve their lower 48 communities. The Seattle chapter began as a citizen's organization in the 1950s, and both the Seattle and San Francisco chapters gained recognition through the Alaska Native Claims Settlement Act. These chapters are incorporated as nonprofit 501(c)3 organizations, allowing them to access grants outside of Tribal funding to support out-of-state members without having to use IHBG funding.²²⁴ Tlingit and Haida also plan to develop a local office to provide Indian Child Welfare services to Washington members. Opportunities brought up during this study included partnership or collaboration with Indian Tribes in Washington or other Alaska Tribes or villages to offer services to Alaska Native people, as well as collaboration with the Native Hawaiian community in order to redefine and advocate for sovereignty.

Alaska is home to several Native Community Development Financial Institutions (CDFIs). While these CDFIs currently serve only Native persons living in Alaska, a focus group participant reported that some of these institutions were expanding, or exploring the possibility of expanding, their service areas to allow them to serve Alaska Native individuals living in other states, including Washington.

²²³ University of Alaska Fairbanks, n.d.

²²⁴ Tlingit & Haida Washington Chapter, n.d.

Identifying and addressing housing needs through planning processes

Planning documents provide an additional source of information on local housing needs in Tribal areas, as well as insights into how such needs might be addressed by Tribal governments and local jurisdictions. Study coordinators from Akana, a partner on this study, reviewed planning documents from Tribes and non-Tribal jurisdictions that include Tribal service areas in order to further determine Tribal housing needs and the short- and long-term planning to address that need. Tribes or Tribally-designated housing entities (TDHEs) frequently conduct needs assessments or other data collection efforts before engaging in planning processes, which can help illustrate specific types and amounts of housing need. Planning documents can also elucidate barriers to meeting needs and how Tribes address those barriers, as well as shed light on the amount of inclusion of Tribes by city and county planning efforts addressing areas with large numbers of Tribal members. The planning literature review for this study included an evaluation of 33 planning documents, of which 20 were Tribal planning documents and 13 were regional- or county-level plans. Plans reviewed included Tribal housing plans, comprehensive plans, land use plans, economic development plans, climate change plans, Tribe socioeconomic profiles, Tribal services profiles, fair housing choice analyses, and county plans to address homelessness. It is important to note that no planning documents were reviewed for 14 of the 29 federally-recognized Tribes in Washington (Hoh, Kalispel, Makah, Muckleshoot, Port Gamble S'Klallam, Puyallup, Quileute, Shoalwater Bay, Skokomish, Squaxin Island, Stillaguamish, Tulalip, Upper Skagit, and Yakama). This does not necessarily mean that planning literature does not exist for these Tribes; rather, it indicates that these types of materials were either not readily identified by the project team or may not be publicly available.

Findings identified within the planning literature generally reinforced similar needs and barriers to those identified through this study's surveys, focus groups, and stakeholder interviews. A lack of available, buildable land can impede Tribes from maintaining pace with the growing housing needs of their communities. Land ownership status can also pose a challenge, as reservations are often a combination of trust, fee simple and restricted fee land, all of which bring unique development requirements. Tribes also must balance development with the need to protect and preserve natural resources on their reservations, which is of heightened importance as natural areas are crucial for certain cultural practices such as hunting, fishing, and food gathering. Strategic land-use planning can be one mechanism to maximize resources while protecting the natural environment and ensuring development occurs in a cohesive manner.

Several Tribes identified the goal of creating planning documents in upcoming years, including comprehensive plans and plans for land use, capital improvements, and emergency management, among others. However, issues of limited staff capacity and funding can impede the development of these documents. Partnering in planning initiatives with neighboring counties or municipalities, non-profits, or higher education institutions may be one way to overcome these deficits. Tribes are often not accounted for or included in a meaningful way in county and regional-level planning processes. In some cases, Tribes were not mentioned in the regional and county plans reviewed, even when there were one or more reservations located within their county or region at issue. In order to address this exclusion, counties and other planning organizations must make efforts to communicate with and include Tribes and the AIAN community as full and essential participants from the outset.

Planning and design approaches seeking to address constraints related to limited available land might traditionally include building higher density housing types. However, whether due to their reservations' remote locations or cultural preferences, Tribal members often prefer to maintain a rural character and low-density development pattern within their reservations. Negative perceptions of multifamily housing by Tribal members

and poor-quality infrastructure also obstruct higher density development. There are several land use development strategies Tribes are already utilizing to grow housing stock while accounting for these factors, including mixed-use and infill housing development, medium density housing types, and culturally specific design. These options are explored further in the [Recommendations](#) section of this report.

Recommendations for reducing or removing systemic barriers

In addition to describing and quantifying the needs and barriers to development of sufficient Native housing in Washington, project coordinators developed recommendations for addressing the need and reducing or eliminating the barriers identified based on the data collected from project stakeholders and analysis of existing local, state, federal and Tribal data sources. The following recommendations recognize that Native housing is managed, regulated and funded at all levels of government. Rather than serving as a prescriptive set of directions for Tribal, government, philanthropic or other entities to take specific actions or limit the list to just one level of government, these recommendations are offered as a holistic list of actions for consideration by all actors involved in the management and development of Tribal housing.

To enhance the accessibility of these recommendations for each of the Native communities addressed in this study and for those who would potentially implement the recommendations described, this section has been further divided into the following subsections: Tribal housing providers, urban Native housing providers, Alaska Native community, and Native Hawaiian community. Within each subsection, issues have been categorized based on the relative timing of their impact on the housing planning, development and management processes. The final subsection addresses opportunities for stakeholders and their partners to collaborate in order to strengthen housing programs and increase and maximize available resources. Project coordinators acknowledge that housing providers and agency staff range in size, capacity and experience, so the following issues are discussed in a plain, non-technical style in an effort to engage and clearly explain these issues to the widest audience possible.

Tribal housing providers

As reflected in the community-specific sections describing the needs, barriers and opportunities for each portion of the larger Native community, the recommendations concerning Tribal housing providers address the need for more robust data and planning activities to assess need, monitor progress, and enhance opportunities for collaboration; the persistent inadequacy of funding; and the need to build and maintain organizational capacity and skills.

Planning

In order for Tribes, Tribal housing entities, government agencies, and others to properly address Native housing needs, they must have accurate needs-related information and use that information in cooperation with others to coordinate efforts and maximize efficiencies and resources.

Data describing and quantifying the need

The data available to address housing and housing markets in general fails to adequately target Tribal communities, and data collected by individual agencies provides a glimpse at only the activities funded by each entity. This shortcoming undermines Indigenous Data Sovereignty and Governance²²⁵ and calls for a reevaluation of how certain data sets are designed and activities that Tribes can engage in to better assess and explain their housing needs. The information collected from stakeholders and existing data sources in this project highlighted promising practices and informed additional efforts to address this issue.

²²⁵ Indigenous Data Sovereignty and Governance are frameworks through which Tribes are able to exercise control over the collection, ownership, and application of data about their people (Seattle Indian Health Board, 2021).

Additional actions to consider:

- Incorporate Tribes and Tribal housing entities in state-level planning for the annual Point-in-Time Count of Homeless Persons and ensure that county-level administrators of counts invite and engage Tribes with land within the county in planning efforts. The Department of Commerce can facilitate this engagement via its coordination of the Balance of State Continuum of Care.
- Specifically compile data summarizing Tribal participation in local, state, and federal programs for use as a program evaluation tool and demonstration of annual resources committed to addressing Tribal housing need.
- Develop a standardized way to pull county-level data statewide; for example, from the coordinated care system.
- Counties can use King County as a model for including Tribal affiliation in HMIS.

Processes using data to develop housing plans

Data describing Tribal housing needs is most useful when Tribes, Tribal programs and the counties and states in which they are located engage in sustained and coordinated efforts to develop strategies for maintaining and developing the types of housing needed and incorporate these strategies into larger planning efforts addressing transportation, education, health, utilities, environmental and other activities.

Additional actions to consider:

- Consider comprehensive land use planning as one strategy to address development within a limited land base. The Spokane Tribe's Integrated Resource Management Plan (IRMP) is one example of best practices for land use planning (Spokane Tribe, 2008). The IRMP, which was created in 1994, focused on preserving the natural environment while balancing the needs of other uses, such as cultural, economic, and housing. The IRMP inventoried all Tribal-held lands and categorized them into restricted and non-restricted uses. Permitted, conditional, and restricted uses were established within these designations. By making long-range projections for which areas of the reservation will be preserved and which can be developed, the Tribe and their housing authority have clear parameters to work within and can be strategic as to what type of development to encourage, without fear of encroaching on natural resources.
- Ensure that regional and county-level planning processes invite and include Tribes with land in the relevant county or region. The Swinomish Tribe and Skagit County present one local example of a partnership between a Tribe and a county. The Tribe and the county have historically had a tense relationship. In 1986, at the instigation of the Northwest Renewable Resources Center, representatives from the Tribal community and the county came together to discuss their mutual interests in the reservation land base (Skagit County and Swinomish Indian Tribe, 1998). The Tribe and the county developed a memorandum of agreement committing both parties to the coordination of land use planning and regulatory activities for the reservation. They developed a cooperative land use program, which is governed by an advisory board with representatives from the Tribe, the county, and a mediator from the Northwest Renewable Resources Center. In 1996, the two groups adopted a shared comprehensive land use plan, which is still active today.
- State and federal entities could require or incentivize the inclusion of Tribal governments and Tribal programs in planning processes for grant-funded projects or programs.

Capacity

Tribal housing entities operate within limited budgets and are often located in areas that are remote with limited infrastructure and employment opportunities. These constraints restrict the size and experience level of the applicant pool for Tribal housing positions, as well as the number of contractors and consultants available and willing to provide new professional or construction services or supplement the capacity that cannot be developed internally. Critical capacity-building efforts are needed to reduce the amount and impacts of staff turnover, expand the skill sets of limited numbers of staff members, and overcome the remoteness

and small size of housing entities by creating partnerships to share or collectively purchase resources or engage contractors.

Additional actions to consider:

- Provide additional training and technical assistance regarding effective and efficient cross-training techniques and documenting of core Tribally Designated Housing Entity (TDHE) history, processes, and data.
- Include board members and Tribal leaders in training and technical assistance to expand Tribal housing capacity and broaden the base of institutional knowledge to withstand turnover.
- Utilize relationships with available consultants and service providers to sustain institutional knowledge and provide interim support during periods of turnover.
- For smaller organizations, consider developing joint purchase arrangements and force account staff with other neighboring Tribal housing entities to create requisite scale to lower cost, overcome remoteness and facilitate housing development.
- Conduct anonymous staff satisfaction surveys (and act based on results) on a semi-annual basis to assess whether there are opportunities to reduce turnover.
- Develop and fund a program that pays high-achieving TDHE staff to provide direct training and technical assistance to other TDHEs.
- Consider expanding the [YouthBuild program](#) in Tribal areas to promote learning of construction skills in the younger generation (which generally has the highest unemployment rates) and increase local availability of construction labor.
- To address the availability/affordability of qualified contractors, smaller programs could pursue collective strategies for purchasing supplies, engaging contractors, and collectivizing TDHE resources.

Funding

Stakeholders for this project identified a complex set of funding issues related to disparities in revenue generated by the housing entity or the Tribe, grant funding that has depreciated over time or was allocated in a way that was perceived as perpetuating capacity-based differences between housing entities, and financing practices that failed or refused to accommodate Tribal land ownership systems or the credit and employment histories of reservation residents.

Revenue

Tribal housing entity revenue is largely driven by rent collection from low-income tenants, monthly payments from participants in homeownership programs, and contributions from the Tribe of a portion of the revenue earned by Tribal enterprises. Decisions to increase the level of funds from any of these sources are internal (and often political), and must be based on determinations regarding the impacts of these decisions on Tribal households, Tribal budgets and the needs of other programs. Some Tribes have begun to view revenue generated from fair market housing (including units rented to non-Tribal members) as a potential source of development and operating revenue for low-income housing.

Additional actions to consider (within the context of Tribal decision-making and resources):

- Evaluate whether some families living in low-income rentals can afford to pay rent closer to HUD Fair Market Rent prices to help cover the cost of unit maintenance and operation and generate revenue for new housing development.
- Determine whether the development of fair market rental units could generate revenue for the development, operation and maintenance of low-income rentals. Focusing on mixed-use development may provide an opportunity to increase Tribal employment.

- Charge utility and other fees separately from rent (which are subject to the 30% rule) as a means to generate revenue, even in situations where tenants are charged \$0 rent.
- Utilize economic development resources to improve future revenue prospects. Programs are available that enable Native Americans to receive job training and set up businesses in Tribal areas with low-interest loans, legal help, and other essential resources for starting a business. These include:
 - The U.S. Small Business Administration's Office of Native American Affairs
 - The BIA Office of Indian Energy and Economic Development
 - The National Center for American Indian Enterprise Development
 - The Workforce Investment Act's Native American Program (Section 166)

Grants

Project stakeholders explained that funding-related issues concerned not only insufficient funding levels but also the manner in which funds were allocated to Tribes via funding formulas and competitive grant processes. They noted the complexity of the processes required to obtain grants and to remain in compliance after being awarded.

Formula grants

Addressing the steady, inflation-related decline of annual block grant funding, especially as housing development costs increased significantly, was viewed as critical by stakeholders because competitive sources of funding are provided to only a few awardees while all Tribes suffer from the declining buying power of annual block grant funding.

Additional Actions to Consider:

- Increase the block grant to an amount equivalent to the buying power of the first Indian Housing Block Grant (IHBG) allocation in 1998 and apply an inflationary factor to increase subsequent grant allocations based on the inflation rate.
- Define and identify all of the housing units constructed with federal funding and apply industry standards to the funding of maintenance and operations in order to preserve these assets built with federal dollars.
- Develop a new IHBG formula variable to replace Formula Current Assisted Stock (FCAS) that provides the funding necessary to maintain all existing housing and develop a specific number of new units on an annual basis (potentially based on waiting list numbers, overcrowding data or other housing shortage data).

Competitive grants

Stakeholders expressed concern that competitive grants tended to be consistently awarded to the same recipients that had mastered the grant application process using hired grant writers. Stakeholders also noted that new competitive programs appeared to stress adherence to a complex set of application requirements over the applicants' level of housing need. However, with respect to the allocation of the first round of Indian Housing Block Grant (IHBG) Competitive grant awards, many stakeholders acknowledged that HUD had made a substantial effort to explain the process to Tribes after the initial round of awards were announced and appeared committed to modifying the process for the next round and providing sufficient training to further level the playing field.

Additional actions to consider

Evaluate length and complexity of grant application processes from an equity perspective in part to determine if grants intended to address need are in effect excluding those with the greatest need and in part to see if the administrative burden of the grant is excessive in relation to the amount awarded.

Financing and lending

Stakeholders for this project noted that Tribal housing entities and local lending institutions, such as CDFIs, had been building the capacity to access low-income housing tax credits and mortgage lending in recent years, but that there were specific opportunities to strengthen Tribal and Tribal member access to these critical financing opportunities. Additionally, lenders operating on Tribal lands have cited the challenge of accessing the secondary market for mortgages as a reason for restricting or limiting their mortgage lending on Tribal lands. In response, Fannie Mae, for example, developed a certification process for allowing Tribes to obtain mortgages using the cost approach in place of comparable sales data, demonstrating that avenues exist for overcoming the unique barriers to mortgage lending presented by Tribal trust lands.

Additional actions to consider:

- Determine whether the exclusion of mortgage lending for homes on trust lands from secondary mortgage market violates anti-discrimination in lending laws.
- Encourage Tribes to pursue a partnership with Fannie Mae, which would allow it to offer its products on reservations (allowing reservation-based loans to be sold on the secondary market for home loans).
- Evaluate models for lending (and evaluation of risk) on trust lands developed by Native CDFIs and 1st Tribal Lending to determine if these models are scalable.
- Consider whether additional funds can be made available to support an extension of the Section 502 Direct Loan Pilot Program in North and South Dakota to Washington.
- Deploy TDHE or other resources to increase the number of property valuations/appraisals within Tribal lands and recordation of these values to strengthen the confidence of buyers, sellers, and lenders.
- Establish loss mitigation funds for TDHEs or Tribes to assume foreclosed loans and resell units to qualified homebuyers.
- Encourage greater homeownership on Tribal lands through expansion of homeownership classes, loan programs, financial literacy and “home maintenance 101” programs to lower barriers for potential homeowners.
- Identify sources of funding to provide down payment and closing cost assistance, which have been identified as primary barriers for employed Tribal members.
- Expand Section 184 lending on trust lands. Agencies, CDFIs and others need to specifically evaluate how to increase lending within trust lands, including incentivizing lender activities and enhancing capital available to Native CDFIs and TDHEs.

Leveraging or combining funding sources

One intention of NAHASDA was to enable and encourage Tribes to secure more private investment and be less dependent on government support to increase the supply of appropriate housing. Another underlying goal was to foster innovation in housing development. However, many of the available funding mechanisms for housing are relatively restrictive in how and when the money can be used. Tribal housing entities also may need to leverage resources beyond the limited funding specifically dedicated to housing in order to fund infrastructure, as well as health and supportive services. Furthermore, leveraging implies a requirement that the Tribe provides or secures a certain portion of the funding. HUD and other funders need to expand training and technical assistance to Tribes in order to make them aware of available resources, requirements and processes; identify funds that the housing entity or Tribe can use towards the specific project in question; and assist them in negotiating terms that advance the objectives of Tribal housing.

Additional actions to consider:

- Determine the basis for and reevaluate the efficacy of the rule that IHS funding for infrastructure cannot be applied to projects funded with IHBG funds.

- WSHFC and Housing Trust Fund spoke about willingness to help with leveraging for projects, indicating that it is possible to make accommodations or coordinate across funding entities to lessen the burden for Tribes.
- Smaller Tribes should consider using Housing Trust Fund when projects are too small to work with LIHTCs.
- Consider combining LIHTC with Housing Trust Fund and FHLB resources.
- Use of Title VI to pay for infrastructure and then pass costs along to homeowners via Section 184. Also, use of Title VI to pay for housing development and then pass along the total cost to the homeowner through Section 184 or USDA Section 502 (treat as revolving loan fund).
- For tax credits, Tribes should consider leveraging funds from FHLB's Affordable Housing Program, Trust Fund, ICDBG, and IHBG Competitive, for example.

Housing development

In their efforts to design and develop housing, Tribal housing entities must wrestle with issues related to the scarcity of available Tribal lands and the cost of designing culturally appropriate and sustainable housing, and navigate an array of administrative and regulatory hurdles to determine, for example, land title and suitability, infrastructure costs, and potential payments to local governments. To address issues of rising housing development cost, affordability of units for tenants or homeowners, and appropriateness of housing size and type for residents, housing entities should conduct assessments to determine whether smaller units or tiny homes, multi-family structures and larger multi-generational units would be more cost-effective and a way to maximize limited available/buildable land.

Additional actions to consider:

Assess lengths of time required to obtain title status reports (TSR) from the BIA and address this issue from a mortgage lending/housing market perspective – determine what changes or additional funding is necessary to improve this process. Tribes throughout the country (including Colville) have contracted with the BIA and Department of Interior to take on federal realty and title roles to reduce delays in completing TSRs and appraisals and facilitate the development of property value/public sales listing (since it is a contracted activity, it also provides revenue in the form of payment for the contracted work).

- Consider inter-Tribal efforts to contract with BIA and complete TSRs (and other traditional BIA title/realty roles) for multiple Tribes.
- Tribes can also pursue authority to execute and approve leases of Tribal trust lands through the [HEARTH Act](#) to reduce delays and administrative hurdles.
- Expand or extend land buyback programs to further consolidate ownership and limit fractionated interests in land and homeownership.
- Consider infill development or building housing on parcels that are vacant or underutilized but are already within developed areas to maximize limited available land while preserving green space and natural areas.
- Explore creative design forms, which achieve a higher occupancy but are not traditional high-density housing (e.g., apartments). Such housing types include attached single-family homes such as duplexes and triplexes, as well as multi-generational single-family homes (See [Opportunities](#) section of Tribal Housing Providers for an example of a successful cultural design from Puyallup Tribe of Indians).
- Incorporate assessment of small or tiny homes, townhomes and apartments into housing planning to determine if lower development costs, simpler maintenance, and shorter construction or delivery times will help reduce housing shortages and meet the needs of specific households (e.g., elders, young families, single professionals, veterans).
- Consider applying Habitat for Humanity's underlying cooperative home development model independently by the Tribe for use on Tribal lands.

- Take advantage of state and national funding to implement YouthBuild programs in Washington (see [RCW 50.72.020](#)).
- Explore the Washington State Department of Commerce's myriad of available programs to help fund and maintain housing and other essential related services such as victim services, community buildings, rural broadband, and more.²²⁶

Specific housing types

Housing providers recognized that, because housing funding levels are insufficient to develop new rental housing, constructing and operating additional population- and need-specific housing is generally not feasible unless supplemental funding sources are available, required services can be sourced, and sufficient internal capacity exists to adopt, monitor and stay in compliance with specialized program requirements. Tribes and Tribal housing entities should further explore additional resources through information sharing with other Tribes, developers, and nonprofit organizations, and with the assistance of state and local government agencies with knowledge of relevant funding opportunities.

Additional actions to consider:

- Use experienced consultants to develop supportive housing with an array of Native and non-Native funding sources.
- Take advantage of the pending expansion of Tribal HUD-VASH to provide housing and supportive services to Native veterans.
- Use the experience and funding made available through the CARES Act to consider housing options to address homelessness and alleviate overcrowding, such as the addition of tiny homes, renting housing nearby, additions to existing homes and development of accessory dwelling (mother-in-law) or carriage house units.

Collaboration

A critical issue that emerged from the analysis of the various programs funding and regulating Tribal housing in this study was the need for greater awareness of the full array of available housing funding options within TDHEs and the relevant government agencies, as well as increased sharing of information and experience between housing providers. While agency staff, housing providers and service providers referenced certain venues in which information is shared by individual agencies in agency-specific updates and reports, such as meetings of the Northwest Indian Housing Association, stakeholders noted that sustained collaboration of agency staff and Tribal housing staff to develop a comprehensive framework of resources and examine opportunities for enhanced integration and coordination would be extremely valuable.

Additional actions to consider:

- Organize regular meetings with a coalition of knowledgeable representatives of Tribes, funding sources, governments, and others (such as the Tribal Housing Action Team [THAT], which had been coordinated by USDA staff). Group could collectivize to problem solve and ask for new funding sources.
- Develop a roadmap for the effective use of the entire array of relevant housing programs and funding sources at local, state, and federal levels (and potentially philanthropic housing donors).
- Sustain Senate Committee and other legislative engagement in Native housing issues via committees and other standing entities to ensure that Native housing is viewed and treated as a piece of the overall state housing puzzle (including for future state-commissioned housing needs assessments).

²²⁶ A full list of Commerce's programs, across its five divisions (Community Services and Housing, Energy, Local Government, Office of Economic Development and Competitiveness, and the Director's Office) is available on its website at: <https://www.commerce.wa.gov/program-index/>

- Evaluate why certain local, state and federal programs do not work well for Tribes and what changes can be made to programs to enhance Tribal participation.
- Add representation from Tribes to the Balance of Washington State Continuum Steering Committee,²²⁷ which currently has representation from every county, but no Tribes. The Balance of State Steering Committee could additionally evaluate their funding program to ensure that Tribes and native-led organizations are aware of the program and do not face barriers to participation.
- Create a working group or committee within the Washington State Department of Commerce to manage Tribal relationships, rather than relying on a single staff member to serve as the Commerce's Tribal liaison, which leaves relationships vulnerable to staff turnover.
- Learn from nearby Alaska TDHEs that can share the "Alaska Model" of using supplemental housing funding for infrastructure and incorporating energy efficiency with housing construction. One respondent during the study noted that Alaska's experience building in remote areas has allowed the state to become a housing industry leader in energy efficiency.

Urban Native housing providers

As reflected in the [Needs](#), [Barriers](#), and [Opportunities](#) sections, the recommendations concerning urban Native housing providers address their unique circumstances and housing needs. These include the need to include providers in planning processes, collect relevant data, expand capacity through additional funding opportunities, and increase collaboration among and between housing providers.

Planning

Similar to the issues described in the [Tribal housing section](#), in order for urban Native housing providers, government agencies and others to properly address urban Native housing needs, they must have accurate, needs-related data concerning the Native community members they serve, and the opportunity to engage in local, regional, and state planning processes that enable Native housing providers to coordinate and capitalize on all available resources. From a data and planning perspective, the challenge for urban Native housing providers is slightly more complex. The scope of the term "Native" for purposes of identifying and serving community members, is generally more expansive than that applied by Tribes and Tribal housing providers. It is extremely difficult to find accurate data that covers all of the community members, obtain that data from the many different potential sources, and compile and implement that data in cooperation with the other governments and organizations serving these community members.

Additional actions to consider:

- Capitalize on relationships with and funding from the City of Seattle and King County to explore opportunities in other urban areas throughout the state, and to establish consistent, reliable funding for Native housing within the larger fabric of housing and homelessness programs.
- Utilize the experience of Tribes seeking to house their homeless members during COVID-19 as an opportunity to discuss partnerships to develop housing and other services for Native people in urban areas throughout Washington.

²²⁷ The Balance of Washington State Continuum of Care is led by a Steering Committee, which is "a body of stakeholders at all levels of government, representatives of non-profit organizations s throughout the diverse geographical area, advocacy groups, regional and county homeless planning organizations and housing and service providers. The Steering Committee also serves as an advisor to the Washington State Department of Commerce on policies, issues and opportunities affecting homelessness within the 34-county jurisdiction." **Invalid source specified.**

Data describing and quantifying the need

The data describing urban and non-Tribal Native housing and housing markets generally do not adequately distinguish Native communities as a distinct subpopulation within larger, diverse populations. Advances made by urban Native organizations in King County through partnerships and agreements with local government agencies have created new avenues for data collection concerning Native users of emergency housing and other services, and have ensured that Native community members are more deliberately and thoroughly targeted during counts of homeless persons, for example.

Additional actions to consider:

- Use the inclusive approach of the Chief Seattle Club and others as a catalyst for data collection to determine the number and percentage of AIAN, Native Hawaiians, etc., participating in programs and examine the reasons behind the participation rates.
- Develop a standardized way to pull county-level homelessness data concerning Native persons at the state level, for example, from the coordinated entry system.
- Counties can use King County as a model for including Tribal affiliation in HMIS.
- Evaluate participation rates of Tribes and Native peoples in city, county, state, and federal programs to assess equity, awareness, and engagement.
- Evaluate reasons why existing housing and housing market data do not facilitate or enable accurate assessment of housing needs for Native communities within urban or rural non-Tribal areas and determine opportunities to improve existing data sources or develop new ones.
- Affirmatively include and engage Native organizations in Point-In-Time Count data collection efforts at the county level in each of the urban areas; the Department of Commerce can facilitate this engagement as part of its coordination of the Balance of State Continuum of Care.
- Expand data collection beyond simply quantifying AIAN population and demographics to also assess individual and family connection to services and cultural resources.
- Allow data regarding Native program successes (such as retention rates in transitional and supportive housing) to serve as a key driver of funding decisions, program planning and partnerships for future programs.
- Use changes to HMIS and coordinated entry program in Seattle/King County to identify opportunities for including these changes statewide and examining usage patterns of Native people (allows Commerce and others to apply racial equity lens and determine the performance of participating entities).

Processes using data to develop housing plans

While urban Native organizations were not traditionally included in local, regional and state-level planning efforts concerning housing and other services, staff of urban Native housing providers now serve as permanent members of city and county committees and have developed Native-centered organizations in which representatives from other government and nonprofit entities participate. Data describing the housing needs of urban Natives must be used in concert with Tribal, local, county, and state data to engage in sustained and coordinated efforts in the communities where they are located.

Additional actions to consider:

- Evaluate the extent to which the housing development field excludes or limits the participation of Native organizations and determine methods to promote the expansion of equity and inclusion.
- Agencies and other funding sources should examine Native housing as a true spectrum that includes long-term housing options, affordable rental housing, fair market rental housing and homeownership.

Capacity

The small size and limited budgets of urban Native housing providers require that these organizations continue to expand their efforts aimed at relationship building and advocacy with other urban providers and funders. Many urban Native organizations operate at a distinct disadvantage when they first seek to become involved in the housing financing and development market due to their small size, limited budgets, inexperience, and the rigorous financial and balance sheet requirements of this industry. Many organizations need to expand their financial literacy and strengthen their financial positions prior to entering the housing financing market. Organizations need to share their knowledge and partner with each other to capitalize on the experience gained by certain Native organizations to date.

Additional actions to consider:

- Use the experience of the Chief Seattle Club and its Native and non-Native partners to develop a roadmap for other urban Native organizations seeking to develop housing, including culturally appropriate design issues and specific sticking point issues like the need for full up-front funding of construction costs and engagement of a property manager with LIHTC experience.
- Advocate for private or government funding for an organization (similar to the now-defunct Common Ground) to provide training concerning pre-development and housing development financial literacy, possibly provided through Home and Hope or other [Enterprise Community Partners programs](#).
- Capitalize on resources and connections of past non-Native partners to engage with organizations that have substantial technical and financial resources, such as the [Housing Development Consortium](#), which could create a separate committee composed of experienced housing development professionals who could support urban Native housing providers.
- Capitalize on the current interest of foundations and philanthropic sources, such as Enterprise Community Partners, in urban Native housing to use the Home and Hope Program and other technical assistance resources.
- Connect with the [Federal Reserve of Minneapolis' Center for Indian Country Development](#) to determine if a funder's summit could be arranged and technical assistance could be provided.
- Encourage housing organizations that serve the general public to provide regular opportunities for cultural sensitivity training for those directly serving Native community members.

Funding

Urban Native housing providers are not eligible for Tribal housing funding and must compete with much larger and more experienced organizations for public and nonprofit housing funding. Despite their intent to serve community members with the greatest housing needs, organizations that are not using Tribal housing funds are not allowed to apply Indian preference. As a result, funding-related solutions must consider alternatives such as a set-aside or grant scoring enhancement for Native housing from dedicated non-Tribal funding sources at the city, county, state or federal level; drawing in funding from Tribes with available resources whose members reside in urban areas; or encouraging greater, more equitable contributions from philanthropic organizations based on the achievements and demonstrated success of urban Native programs.

Additional actions to consider:

- Address eligibility of urban Native organizations to directly receive Continuum of Care funding (or, at a minimum, have a certain portion dedicated to serving Native peoples based on the number of homeless Native people in HMIS and Point-in-Time Count data).
- Provide urban Native organizations with greater and more consistent access to Housing Choice Vouchers (formerly known as Section 8) for Native community members.
- Explore partnerships with Tribes to facilitate serving Tribal members in urban areas using federal funds.

- Determine if a portion of existing non-Tribal housing funding could be set aside for Native organizations (potentially to serve only urban Tribal members if required).
- Explore ways to allow Native-specific housing and service organizations in urban areas to provide Native preference.
- Continue inclusion of housing for Native homeless in City of Seattle funding allocations and expand to larger cities and urban areas outside of Seattle (such as Tacoma and Spokane).
- Engage local, regional, and national foundations to directly address the gap in giving to Native organizations and highlight successes and efficiencies of Native organizations' programs, including transitional/supportive housing retention rates and the development of new units.
- Treat initial allocation of funds from the city of Seattle that led to the Sacred Medicine House as a pilot project for future city-, county- and state-funded developments (to demonstrate that lack of funding, not capacity, is the real issue and that Native housing/services set-asides or carve-outs are both feasible and necessary).
- Discuss potential funding opportunities with large foundations (for example, the Bill & Melinda Gates Foundation, Paul G. Allen Family Foundation, Seattle Foundation, Robert Wood Johnson Foundation, and others) to fund urban Native projects based on need and recent achievements and successes and for assistance with capital campaigns and strengthening of balance sheets in advance of housing development.

Housing development

Housing development for urban Native providers has to be approached as a collective effort, with both Tribal and other urban providers. Housing development should be tailored to the unique needs of the urban Native community with respect to housing types, cultural preferences, and supportive services.

Additional actions to consider:

- Approach funders collectively and holistically to consider both Native housing and other critical services. For example, Seattle Indian Health Board (SIHB), United Indians, Seattle Indian Services Commission (SISC) and Chief Seattle Club (CSC) approached funders to consider Native housing and other services in King County.
- Extend collaboration of existing organizations to provide relevant services in new developments. For example, Chief Seattle Club is developing *ʔálʔal*, a housing project located near their existing building that will rent space to SIHB to provide services.
- Utilize demonstrated success of Chief Seattle Club's modular housing project, [Eagle Village](#), in reducing Native relapse into homelessness by providing safe, culturally appropriate space for urban AIANs as a replicable model for other urban areas
- Explore opportunities to replicate or adapt the [partnership between NAYA and Siletz](#) to develop urban Native housing that includes 20 units of housing dedicated to specific Tribal members (Siletz Tribe).

Collaboration

Additional actions to consider:

- Organize regular meetings with Native housing providers and a coalition of knowledgeable representatives of funding sources and representatives from all levels of government.
- Develop a comprehensive list of programs and funding sources at local, state, and federal levels (and potentially philanthropic housing donors) that can help fund housing for urban Natives.
- Sustain Senate Committee and other legislative engagement in Native housing issues via committees and other standing entities to ensure that Native housing is viewed and treated as a piece of the overall state housing puzzle (including for future state-commissioned housing needs assessments).

- Partner with Tribes that express interest in developing deeper partnerships with urban Native housing organizations so that Tribal members living in cities can find housing and supportive services.
- Ensure sustained representation from urban Native housing providers on the Balance of State Continuum Steering Committee. The Committee could additionally evaluate their funding program and suggest legislation to ensure that Native-led organizations are eligible to participate.
- Create a working group or committee within the Washington State Department of Commerce to manage and sustain relationships with urban Native housing providers.
- Consider establishing a consultation mechanism for urban Native housing and supportive services providers modeled after the Urban Confer mechanism that Urban Indian Health Programs (UIHP) have with the federal government (117th Congress, 2021). Urban Confer provides an opportunity for an exchange of information and opinions that lead to mutual understanding and emphasize trust, respect, and shared responsibility between UIHPs and government agencies. SIHB has formally suggested that HHS implement an Urban Confer policy across all agencies and departments within HHS jurisdiction. The same process should be considered for HUD as well.
- Advocate for the creation of a Native and Tribal committee at the state level for Continuum of Care and other Department of Commerce programs based on achievements in Seattle/King County.

Alaska Native Communities

Alaska Natives living outside of the state of Alaska have limited access to support from their Tribe or Native village. They rely on services provided by urban Native organizations, Washington Tribes if they are married to Tribal members, and support provided through Alaska Native-focused cultural activities. Their reported needs include health care, financial literacy programs, and Native-led housing developments that prioritize intentional and supportive communities. Alaska Native communities should consider expanding their organizations and activism in Washington, build on existing organization and collaboration within the Alaska Native community, reach out to and collaborate with other Native organizations, and explore partnerships with Alaska Native Corporations. State, Tribal, and urban nonprofit organizations are logical partners in this effort.

Planning

Better quality data describing the Alaska Native population in Washington will improve planning by quantifying housing needs, understanding types of housing needs, and barriers to service. Specifically, planners need an organization or mechanism to help organize data collection and utilize collected data.

Additional actions to consider:

Consider the creation of a new Alaska Native organization in Washington, which could potentially be co-housed with Tlingit and Haida entities (see below) but would serve as an umbrella organization and service provider for all Alaska Native communities in Washington. This organization could potentially be affiliated with or connected to the [Alaska Federation of Natives](#) (AFN) and utilize AFN's model to conduct a statewide housing needs survey in which AFN was able to both demonstrate housing needs and use the survey results to better target or prioritize available resources.

Capacity

The Alaska Native community is in the early stages of building organizational capacity in Washington, with one Tribe, the Central Council of the Tlingit and Haida Indian Tribes of Alaska, developing a local office to provide Indian Child Welfare services. Expanding beyond one Tribe and planning for an expansion of the array of services offered to community members should continue.

Additional actions to consider:

Tlingit and Haida could use their ongoing efforts to expand their presence in Seattle to reach out to other Alaska Native Tribes/villages in Alaska and invite them to convene their members in Washington to discuss the needs of Alaska Natives and begin to collect information about this community (since it is difficult to extract from broader AIAN data).

Collaboration

Especially in urban areas, similarly situated communities (such as without treaty rights or direct access to federal Tribal programs in Washington), such as the non-federally recognized Tribes, Native Hawaiians and Alaska Natives, could collaborate to develop opportunities to provide mutually beneficial services using facilities and guidance from existing urban Native and Tribal organizations. This collaborative effort could include BIPOC and other organizations representing people of color and refugees in order to build critical mass, share knowledge, and leverage shared resources.

Additional actions to consider:

- In recognition of the migration of community members to the north and south of the Seattle metropolitan area, consider expanding relationships with those jurisdictions and better educate them on the specific needs of the Alaska Native community.
- Consider using headway already made in the health services realm (SIHB) in terms of connecting urban services and Tribes to advance related housing projects.
- Utilize areas of existing commonality (in education/Tribal colleges, carving and other crafts, and Alaska Native staff of service providers) to deepen ties of Alaska Native communities and Tribes in Washington and determine how best to incorporate Alaska Native people into Tribal programs and organizations.

Housing development

The goal of providing more intentional cultural communities is an important component in housing development. Existing models and potential funding sources should be explored.

Additional actions to consider:

- Examine which services and cultural activities can and will be funded by Alaska Native Corporations and use those as a catalyst for the development of adjacent/connected housing facilities, possibly in collaboration with existing urban Native organizations.
- Explore the opportunity to develop a larger urban housing complex for Alaska Natives (similar to Asian communities), possibly using Alaska Native Corporation funds as part of an investment portfolio.
- Explore the model of elder housing created in the heart of the Filipino community in Seattle²²⁸ to learn how impactful culturally responsive housing can be and how to best implement it.

Homeownership

Homeownership challenges, such as the need to educate and prepare homebuyers and improve access to financial institutions, can be addressed by outreach to experts and using community gatherings to educate potential homebuyers.

²²⁸ Filipino Community Village is a 55+ community adjacent to the Filipino Community Center (<https://www.humangood.org/filipino-community-village>)

Additional actions to consider:

- Use large inter-Tribal events for the Alaska Native community as a vehicle for developing a community loan fund to support homeownership (possibly limited to down payment assistance or closing costs).
- Work with Tlingit-Haida Regional Housing Authority's CDFI, [Haa YaKaawu Financial Corporation \(HYFC\)](#), to expand its homeownership (Section 184) service area, including renovation/rehab loans and homebuyer readiness courses, to include Washington.
- Capitalize on the existing set of consultants and homebuyer readiness consultants and programs available to Tribes and Native programs in the region — participate in HUD-sponsored training sessions and other training and technical assistance offerings at the invitation of Tribal/Native programs.

Native Hawaiian communities

Native Hawaiians rely on Hawaiian civic and cultural organizations and on urban nonprofits for community and support. Because they are grouped with Asian and Pacific Islanders in Census and other population data sets, there is a need for better and disaggregated data to measure the extent of need as well as to measure the effectiveness of existing community resources.

Planning

Better quality data describing the Native Hawaiian population in Washington will improve planning by quantifying housing needs and allowing community leaders and others to better understand the types of housing needs and barriers to service that are impacting the community; this data can be used to advocate and plan for additional services and attract new funding.

Additional actions to consider:

- Civic clubs and halaus can serve as a vehicle to coordinate resources, training sessions and access to community-based programs, expanding beyond purely cultural programming.
- Consider using large community gatherings and festivals to begin collecting data about the community and its needs.
- Utilize new and existing data to show elected officials and local and state agencies how many Native Hawaiians are in communities and in need of services (based on homelessness or income levels) and request evidence that agencies have evaluated their own performance in serving Native Hawaiians and other Native communities.

Capacity

The Native Hawaiian community already has leaders and organizations in place in Washington, but they are mostly focused on cultural activities and engagement. By tapping into existing resources and capacities, there is an opportunity to expand the range of services offered by existing organizations, such as civic clubs. Native and other service providers could also work in conjunction with Native Hawaiian cultural organizations in order to expand their reach and ensure that services are culturally appropriate.

Funding

Additional actions to consider:

- Use Hawaii radio connection and online vendor portals (developed to support Hawaiian businesses during the pandemic) to promote broader community support in terms of scholarships and community-based lending.
- Native Hawaiians on board of Chief Seattle Club, for example, can work with urban Native providers to more comprehensively understand how and how many Native Hawaiians are served by these organizations

and what is possible given funding and other constraints (these organizations may provide a vehicle for philanthropic donations or other funding specifically targeted to the Native Hawaiian community).

Homeownership

Additional actions to consider:

Since Native Hawaiians primarily operate within their family and their community in relation to housing, and there is a history of information sharing in the community via newsletters and community resources, consider community listing for rentals, unit sharing and even home sales.

Conclusion

As this report has described, American Indians, Alaska Natives, and Native Hawaiians in Washington expend a disproportionately high portion of their income on housing, are more likely to live in substandard housing, and are more likely to experience homelessness compared to the average Washington household. This is largely due to the historic and ongoing underfunding of Native programs. A major funding source for American Indian/Alaska Native housing in Washington Tribal areas, the Indian Housing Block Grant, has eroded in buying power since its 1996 passage due to inflation, and this has forced TDHEs and Native housing providers to leverage multiple funding streams, including those from USDA, HUD, the VA, the Washington State Housing Trust Fund, WSHFC, Tribal funds, and more in order to pay for the development and maintenance of housing. Urban Native housing providers face high development costs, few dedicated funding streams, and lack the ability to target limited resources to their own community through applying Native or Indian preference. Alaska Natives and Native Hawaiians do not have programs in Washington that uniquely address their housing needs, and substantial data gaps exist that limit efforts to properly characterize or quantify their needs. While many barriers to addressing housing needs exist, this report also presented opportunities and recommendations for assisting these communities in addressing their housing needs.

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Appendix A: Literature review

The following provides additional information from reports and studies discussed in the History of Federal Native Housing Assistance and Native Housing Needs Studies sections.

HUD-commissioned "Assessment of American Indian Housing Needs and Programs," completed by the Urban Institute in 1996²²⁹

This was a comprehensive national study of housing conditions and resources in Native American communities. Data collection included special tabulations of Census information, as well as surveys, site visits, and interviews with local leaders and housing officials. The objectives of the study were to: evaluate the housing problems and needs of American Indians and Alaska Natives; assess the effectiveness of existing federal housing programs in meeting those needs; and compare alternative approaches and suggest ways in which federal policy regarding the housing of Native Americans could be improved. At the time of this study, the two dominant forms of housing assistance in Tribal areas were: the Rental program, which operated like public housing and the Mutual Help program, a homeownership (lease-purchase) program in which buyers made monthly payments. Unlike the Rental program tenants, those in the Mutual Help program housing covered their own operating and maintenance expenses. Both programs (commonly referred to as 1937 Act programs) were administered by IHAs, agencies whose boards are appointed or elected by the Tribes they serve.

The 1996 study reported that the housing provided under the 1937 Act accommodated about one-fourth of all American Indian and Alaska Native (AIAN) households living in Tribal areas and had substantially improved living conditions for thousands of families. However, the findings related to housing conditions echo those of the earlier BIA and IHS studies cited above. For example, on reservations and in other Tribal areas, the study found, using Census data, that 28 % of AIAN households were overcrowded or lacked plumbing or kitchen facilities (the comparable average for all U.S. households at the time was only 5.4%). A sample survey conducted as a part of the study suggested that accounting for condition, and other facility problems, the total households overcrowded or living in inadequate housing in Tribal areas was around 40% (while the comparable U.S. average was 5.9%). For AIAN households living in other locations (metropolitan and nonmetropolitan), affordability rather than physical deficiency was the dominant problem.

Furthermore, a considerable amount of land in Tribal areas was held in trust for the Tribes as a whole, rather than being subdivided into many private holdings as occurs in the rest of the country; this has frustrated the development of private housing markets in Tribal areas and has long been seen as providing special justification for government assistance in housing production.

The study also documented the tremendous diversity of Tribal areas, ranging from extremely isolated and poor Tribes to somewhat better-off Tribes located nearer metropolitan labor and housing markets. This diversity contributed to the conclusion that Tribes needed a more flexible funding source since existing statutory restrictions prevented capable local administrators from using program resources as efficiently and equitably as possible based on their own Tribe's circumstances. The study recommended consolidating existing programs into grants that give Tribes and their IHAs broader latitude in planning, funds allocations, and implementation to address local housing needs as they see them but hold them more clearly accountable for performance. The report also noted that such an approach required technical assistance and other means to strengthen the management capacity of IHAs in order to benefit from enhanced flexibility.

²²⁹ Kingsley, et al., 1996

For Native Americans with housing problems living in urban centers and other locations outside of Tribal areas, the study recommended expanding their access to assistance within the framework of federal housing programs provided for the general population. Finally, the report recommended policies that promote and facilitate enhanced private investment in Indian housing.

These recommendations informed the debate that ultimately led to the acceptance of the block grant approach. The Native American Housing Assistance and Self-Determination Act (NAHASDA) was passed in 1996 in order to acknowledge and promote Tribal sovereignty in addressing low-income housing. Under the new act, Indian Housing Block Grant funds were allocated directly to Tribes, who could then develop low-income housing according to the needs of their own communities. The funds were allocated in the form of annual grants, which recognized the autonomy and authority of Tribal governance.

The US Government Accountability Office (GAO) assessed NAHASDA's effectiveness about a decade later (U.S. Government Accountability Office, 2010). GAO analyzed agency documentation, surveyed all Tribes receiving grants in fiscal year 2008, conducted site visits with select Tribes, and interviewed officials at HUD and other agencies. GAO found that most grantees viewed NAHASDA as effective, largely because it emphasizes Tribal self-determination. HUD administrative data indicated that Tribes had used NAHASDA block grant funds to develop new housing and to provide other types of housing assistance to eligible members, but fewer small grantees developed new housing. Out of 359 grantees in fiscal year 2008, 102 received less than \$250,000, with only 22 of those reporting that they had developed new housing over the life of their participation in the program. At that time, HUD tracked only units built, acquired, or rehabilitated and did not have information on other Tribal housing activities such as tenant-based rental assistance. Grantees said the program had helped to improve housing conditions and increase access to affordable housing, but they reported that developing housing finance mechanisms and increasing economic development remained challenges. Housing-related infrastructure development is an affordable housing activity under NAHASDA, but 85 % of grantees responding to the GAO survey reported that developing infrastructure, such as providing homes with access to drinking water, was a continuing need.

A second GAO study, conducted from 2013-2014,²³⁰ further explored challenges faced by Tribes under NAHASDA. The study reviewed NAHASDA and its implementing regulations, testimonies by Department of Housing and Urban Development (HUD) and Tribal representatives, prior GAO reports, and other relevant literature; interviewed national stakeholders representing American Indian, Alaska Native, and Native Hawaiian housing interests, and housing officials from 23 Tribes; and conducted site visits with two Tribes. The most commonly identified external challenges included the often remote location of Tribal lands and lack of infrastructure, such as running water and sewer systems, and the associated high development costs. Tribes also identified differing federal agency requirements, particularly for environmental reviews, as a challenge that delayed projects and increased costs when Indian Housing Block Grant (IHBG) and other funds were combined. Tribes were concerned about changes in federally authorized training and technical assistance. The most commonly identified internal challenges were recipients' limited administrative capacity, conflicts within Tribes that impact housing priorities and planning, and cultural preferences for certain types of housing. GAO supported a coordinated interagency effort similar to that of an existing federal infrastructure task force, but specific to Tribal housing, to develop and implement a coordinated environmental review process for all agencies overseeing Tribal housing development. With respect to capacity building, GAO recommended that HUD undertake more outreach to Tribes about training opportunities and disseminate promising approaches that other Tribes have used to address housing challenges.

²³⁰ U.S. Government Accountability Office, 2014

In 2015, GAO reviewed the data sources and formula used to allocate Indian Housing Block Grant (IHBG) funds. The formula includes a component that assesses a Tribe's need for affordable housing activities (need component). To make funding allocations to Tribal entities, the IHBG program largely relies on U.S. decennial census data, which includes information on population counts, housing, and income characteristics for Native Americans. Changes in how census data are collected and whether the decennial census still serves as the best source of data have been issues discussed during negotiated rulemaking meetings—a collaborative process used by HUD staff and Tribal representatives to develop regulations for the IHBG program. Tribes, Tribally Designated Housing Entities (TDHEs) or HUD may challenge the data used and submit alternative data sources for consideration that they believe more accurately reflect their need.

The GAO found that NAHASDA was considered a welcome improvement by Tribes but that Tribes continued to face challenges to development. In late 2010, the U.S. Department of Housing and Urban Development commissioned a national housing needs assessment. Completed in 2017 by the Urban Institute, *Housing Needs of American Indians and Alaska Natives in Tribal Areas*²³¹ remains the only comprehensive national study of the housing needs of American Indians and Alaska Natives since NAHASDA was implemented. This study presents national benchmarks that provide context for the current study. The national study suggested categories, definitions, survey questions and analytic approaches that informed our methodology for studying Native housing needs in Washington.

In late 2010, the U.S. Department of Housing and Urban Development commissioned a national housing needs assessment for the 617 AIAN Tribal areas and 526 surrounding counties defined by the U.S. Census Bureau.²³² Completed in 2017 by the Urban Institute, *Housing Needs of American Indians and Alaska Natives in Tribal Areas* remains the only comprehensive national study of the housing needs of American Indians and Alaska Natives since NAHASDA was implemented. The study encompassed demographic, social, and economic conditions; housing conditions and needs; and (3) housing policies and programs, particularly NAHASDA and the Indian Housing Block Grant, providing a broad assessment of how Tribes have used the control of HUD housing funds they gained through passage of NAHASDA.

The 2017 report also provides thorough documentation of national data sources and descriptions of relevant federal policies. The data sources included U.S. Census data products (2000 and 2010 decennial censuses, American Community Survey, and American Housing Survey) and HUD Office of Native American Programs (ONAP) Performance Tracking Database (PTD), derived from the Annual Performance Reports (APRs) submitted by all Tribes that are IHBG grantees. New data collection included a nationally representative in-person survey of households in 38 Tribal areas, a telephone survey of a nationally representative sample of 110 Tribal housing program administrators, and interviews with a broader array of local leaders in site visits to 22 of the sampled areas.

The study again documents the diversity across Tribal areas and the continued challenges faced by Tribes regarding infrastructure, housing and economic development, and funding. As reported in 2017, the overall economic well-being of the AIAN population generally remains worse than that of non-AIANS almost everywhere and more so for AIANS in Tribal areas than for AIANS living in other parts of the country. Physical housing problems for AIAN households in Tribal areas remain much more severe than for U.S. households, on average, and are especially worse for low-income AIANS. The share of AIAN households in Tribal areas with a cost burden problem is comparable with that of all U.S. households, but there is a shortage of housing for low-income AIANS in Tribal areas nationally. This study generally confirms that, in Tribal areas, homelessness

²³¹ Pindus, et al., 2017

²³² Pindus, et al., 2017

mostly translates into overcrowding rather than having people sleeping on the street. The study estimated that, at the time of the household survey in 2013–2015, between 42,000 and 85,000 people in Tribal areas were staying with friends or relatives only because they had no place of their own; that is, they were homeless. A strong preference remains for homeownership in Tribal areas. The homeownership rate in Tribal areas is already high, but many households are renters, and nearly all want to become homeowners. They face notable barriers in achieving that goal.

However, the study finds that advances in socioeconomic conditions in many Tribal areas have occurred during the past two decades, offering promising models for change. Advances include improvements in higher educational attainment and vigorous initiatives by Tribes exercising their self-determination to drive economic development. The study states that Tribes have demonstrated the capacity to construct and rehabilitate housing for low-income families at substantial levels under the NAHASDA framework and that the Tribes prefer operations under NAHASDA to the previous system because it enables Tribes to design, develop, and operate their own affordable housing programs based on local needs.

TDHEs still face significant challenges in carrying out their plans. The report recommends enhanced technical assistance, coordination across federal agencies, and sharing promising practices for attracting private investment. Congress has provided a fairly consistent level of funding for the IHBG in nominal terms, but the program's buying power has declined markedly over the years due to inflation. In constant (1998) dollars, total IHBG funding goes down from the \$599 million of 1998 to a low of \$428 million in 2013, only 73 % of what the program could have purchased at the 1998 level. The report concluded that "insufficient funding, more than administrative capacity, is the major constraint on providing housing" (p. 150).

Outside of IHBG funding, Tribes are eligible for the Indian Community Development Block Grant (ICDBG), Title VI Federal Guarantee, Section 184 Loan Guarantee, and HUD Drug Elimination. IHBG and ICDBG funds are available to all federally recognized Tribes, and the other funds are awarded competitively. Urban Native housing providers also receive non-Tribally specific HUD funding. This funding, however, does not capture all the native housing needs. For example, the funding that urban providers receive through HUD must comply with the Fair Housing Act of 1968, which prohibits discrimination by housing entities based on race or color, religion, sex, national origin, familial status, or disability. While this act is meant to prevent discrimination against marginalized groups in housing generally, it also prevents Native organizations from providing preferential treatment to Native people, as that would constitute discrimination against other identity groups. Urban providers tend to be 501(c)3 nonprofits, which give those organizations access to direct donations and grants specific to non-profit service organizations.

"Housing Needs of American Indians and Alaska Natives in Urban Areas"

The *"Housing Needs of American Indians and Alaska Natives in Urban Areas"* report provides context for the study of urban Native housing in Washington. Prepared by Urban Institute as part of the national Assessment of American Indian, Alaska Native, and Native Hawaiian Housing Needs for HUD and completed in 2017, this report describes housing conditions, opportunities, and challenges experienced by American Indians and Alaska Natives (AIANs) who live in metropolitan areas, mostly outside of reservations or Tribal lands. The research focused on economically disadvantaged Native households, both Tribally enrolled and not enrolled.²³³

Data were collected from 24 metropolitan statistical areas (MSAs) via telephone interviews in 19 of the MSAs and via site visits within five of the MSAs. The initial point of contact in each selected MSA was the identified Indian Community Center (ICC) or AIAN-focused organization. Findings are based on data collected through

²³³ Levy, Biess, Baum, Pindus, & Murray, 2017

interviews and discussion groups with housing professionals, service providers, and AIAN community members and on secondary data drawn from the American Community Survey, the decennial census, and the Home Mortgage Disclosure Act.

While the study's findings cannot be generalized to the national AIAN population or to Washington's urban areas specifically, they are consistent with findings from the current study. The HUD study conducted by Urban Institute found that the urban Native population is disproportionately economically disadvantaged and faces cultural and experiential barriers to accessing services and achieving a measure of housing security and stability. They are more likely to live in substandard housing and are more likely to be cost-burdened and live in housing that is overcrowded, either by choice—to live with extended family—or by necessity—to manage housing costs. Homelessness among AIAN populations was identified as a serious problem in many of the study sites.

Many Native households lack familiarity with urban housing market practices when they move to metropolitan areas. AIANs move from a reservation or village to a primary city or metropolitan area for a number of anticipated advantages, including educational or employment opportunities or healthcare options, or to leave unfavorable circumstances. They do not always move to the nearest MSA—the AIAN population within any given area was said to be diverse in Tribal enrollment or affiliation. Furthermore, some tend to move back and forth between Tribal land and metropolitan areas on the basis of circumstances and opportunities, whereas others leave metropolitan areas to return to their reservation or village for the long term, often because of family ties and responsibilities, financial circumstances, or a sense of being out of place.

The study found few organizations in urban areas that provide housing assistance specifically to AIAN households or serve them exclusively. No source of dedicated housing funding comparable to NAHASDA has been established to serve AIANs who live in metropolitan areas. Options for AIANs who seek help with housing needs consist mostly of organizations serving the general public. Native-specific organizations, like other service organizations, can raise funds and apply for local, state, and federal grants and contracts, but most service organizations that serve Natives do not have a Tribe or corporation from which to seek funding. NAHASDA funds can be used off-reservation or outside Tribal areas or villages—and some Tribes have issued funding to urban organizations to provide services to their Tribal members—but, understandably, the need for housing resources on Tribal lands often takes priority. Based on what has been learned about the mobility of people between reservations and urban areas—especially regarding factors that affect mobility—housing needs in both urban areas and reservations should be considered together. The opportunities and challenges in one context effect lives in the other.

Appendix B: Highlighted housing issues

Federal recognition of Tribal governments

Federal recognition is a key access point to most of the federal funding mechanisms for which Tribes are eligible. Historically, federal recognition has occurred through the treaties the United States government signed with Tribes. These treaties gave up Tribal lands in exchange for reservations and promises of resources and other aid by the federal government. Treaties serve as the foundation for how the U.S. government deals with Tribes, most importantly in affirming Tribal nations' sovereignty as self-governing nations. Through federal recognition, the relationship between Tribes and the United States is one of government-to-government, and this relationship also creates eligibility for funding and other services through the Bureau of Indian Affairs.

For Tribes who did not enter into treaties with the U.S. government or signed treaties that were not ratified, federal recognition can be obtained through a formal process that requires an act of Congress, an administrative procedure under 25 C.F.R. Part 83, or by decision of a U.S. court. Even if a Tribe receives recognition from one federal administration, the decision can be reversed by a subsequent administration, as was the case for the Duwamish Tribe, which received recognition from the Clinton administration, but this decision was later reversed by the Bush administration. Of the non-federally recognized Tribes in Washington, the Duwamish, Chinook, and Steilacoom Tribes are in the process of petitioning for recognition by the federal government. Of the 29 Washington Tribes currently recognized by the federal government, Cowlitz, Snoqualmie, Samish, and Jamestown S'Klallam all gained federal recognition through this process.

While federal recognition is an important factor in accessing funding opportunities, it is only one piece of the puzzle of accessing Tribal funding and resources. Reinstated or newly recognized Tribes do not have land bases that can be used as reservations. Land is an important asset that can be used for housing development, Tribal administration and hubs of culture and resources, and revenue-generating casinos and other gaming industries. Tribes are allocated funding in accordance with the size and need of their population, which is determined using ACS data over a defined service area. Service areas include reservations and Tribally-owned land, as well as specified non-Tribal areas in which there is a high density of Tribal members. Newly recognized Tribes have trouble defining service areas that don't overlap with or disturb existing service areas of other nearby Tribes. Some Tribes that have been recently recognized or reinstated must buy back land on the open market and apply for it to be placed into Tribal trust status in order to create reservations, such as Cowlitz. Tribes that were federally recognized after NAHASDA was enacted, and those that were already recognized but didn't have any units under the 1937 Act, have no "FCAS" (or subsidized) units. Thus, all of their housing units are unsubsidized from a maintenance and operations standpoint. Some recently recognized Tribes without land bases, such as Snoqualmie Tribe, do not develop or manage housing and instead serve their Tribal members through rental assistance and other services that can be provided remotely.

Federal recognition and subsequent access to services hinges directly on treaties signed generations prior. However, these treaties did not cover the breadth of Native Tribes, villages, and communities in the United States and were frequently signed by Tribal leaders who did not understand or were not truthfully told what was contained in the treaties. Some Tribes, like Chinook, signed treaties that were not ratified by the U.S. Government, resulting in land being handed over hundreds of years ago but no present-day protections, land, or sovereignty.

A combination of federal recognition and reservation land allows Tribes access to an important additional revenue stream: gaming. Twenty-four Washington Tribes operate 30 casinos throughout the state. Newly reinstated Tribes who do not have land for a reservation are unable to build or operate casinos.

Gaining Tribal recognition is an issue that extends beyond U.S. politics into Tribal politics. Most Tribal funding mechanisms are not based on the number of existing Tribes but are set amounts that are allocated amongst Tribes, either based on population and need-based formulas or through competitive grants. In either case, a higher number of federally recognized Tribes means that the same limited amount of resources gets distributed between more entities. Additionally, as stated above, newly recognized Tribes can disturb existing formula areas and, should a Tribe become federally recognized and acquire land, may increase competition for valuable grant resources or casino revenue. For these reasons, Tribes often object to the federal recognition of other Tribes.

Alaska Tribes and villages, while federally recognized, are limited in the resources they can provide to out-of-state residents, which leaves Washington-based Alaska Native Tribal members without access to the federal support or funding that is allotted to their home Tribe. Native Hawaiians, on the other hand, did not sign any treaties. Instead, prior to becoming a territory, Hawaiian lands were stolen in a coup by sugar plantation owners that was supported by the U.S. government (U.S. Department of State, 2009). The recognition of Hawaii as a state was made subject to the state's protection and proper administration of the rights and lands of Native Hawaiians, which were previously administered by the federal government. But without treaty documents, Native Hawaiians do not have the same sovereignty rights as Native Americans. Native Hawaiians with at least 50% blood quantum can apply for Hawaiian Home Lands leases through the Hawaiian Home Lands Act of 1920, but the available land is limited to the Hawaiian Islands, and the waitlist for leases is so long that many people have died on the waiting list before getting a lease.²³⁴

Relocation of coastal Tribal communities

Tribes located on the western coast of Washington face the possibility of destructive tsunamis brought about by earthquakes in the Pacific Ocean. Tsunami risk is exacerbated by the effects of climate change, which has brought significant changes to the landscape of coastal Washington, home to 5 of Washington's 29 Tribes. The four glaciers in the Olympics have disappeared or are rapidly receding, bringing about rising sea levels and decreased river flow. With their homes at imminent risk of floods, tsunamis, and other natural disasters, many Tribes have begun plans to relocate their people. The Quileute Tribe has adopted a Move to Higher Ground initiative to raise funding to aid their residents and facilities with the aim of relocating to higher elevations. The Lummi Nation has a Climate Change Mitigation and Adaptation Plan to similarly relocate buildings out of flood zones. The Tribal Coastal Resiliency Act, a federal bill that passed the House of Representatives in December of 2019, would create grants to help Tribes implement their climate change plans. The bill did not reach a Senate vote and will need to be reintroduced. This funding is important to the success of these relocation efforts, as FEMA funding is usually tied to specific disasters, is less accessible for low-income families,²³⁵ and generally does not support large-scale relocation efforts such as those being undertaken by coastal Tribes.

Point-in-Time Count of Homeless Persons

The Homelessness Housing and Assistance Act was passed in Washington in 2005. Under the requirements of the act, local governments developed ten-year homelessness plans with the goal to eliminate homelessness and to reduce existing homelessness by 50%. The Act also implements HUD-required annual county-level Point-in-Time (PIT) counts of sheltered and unsheltered persons experiencing homelessness. The 2020 PIT count was held in January 2020, with results expected to be published in July 2020. However, as of the

²³⁴ Associated Press, 2020

²³⁵ Rice University, 2020

publication of this report, the statewide PIT count has been released, but the final report has not been published on the [Department of Commerce website](#).²³⁶

King County and Seattle

Seattle/King County published its PIT count report in July, so numbers and analysis are available for the Seattle area. In 2020, 15% of the people experiencing homelessness in Seattle/King County identified as American Indian or Alaska Native. In 2017, the PIT count showed that AIAN persons only accounted for 6% of the homeless population of King County.²³⁷

However, Native-led groups, including Chief Seattle Club, Seattle Indian Health Board, and Urban Indian Health Institute, believe these numbers were a vast undercount of Native homelessness.²³⁸ The undercount was thought to be due to a lack of adequate outreach to Native service providers, sampling and sampling methodology errors, as well as the “multiple races” category on the survey, which could obfuscate the true numbers of Native people experiencing homelessness. The “multiple races” category on the survey did not allow respondents to identify which multiple races the participants were, but generations of colonization mean that most Native people are multiracial. While the multiple races option essentially erases Native people from counts via too much aggregation, there is also a risk of inaccuracies if data is too disaggregated, including over counts for white people when looking at individual races represented in the data for people who select multiple race categories due to many multi-race persons being part white. A 2007 HHS report highlighted the data issues that lead to inaccurate data on homelessness for American Indian/Alaska Native/Native American (AI/AN/NA) populations.²³⁹

The highlighted data availability and quality issues include, small population size, geographic dispersion and rural concentration of Native populations, misclassification of race, lack of consistency in race identifiers in many data sources, inadequate racial representation leading to limited response rates and issues with question interpretation, exclusion of Pacific Insular Areas in many surveys, and inadequate collection of data on AI/AN/NA subgroup. To correct the undercount in King County, a coalition of Native service providers worked with King County to better ensure more inclusive data collection and analysis for future PIT counts. Subsequent counts in King County, which show significantly higher proportions of Native people experiencing homelessness, are thought to be more accurate estimates. These efforts to correct undercounts and ensure more accurate data representation for Native populations are not statewide, so counts elsewhere in the state continue to suffer from these data inadequacies.

The fact that Native people make up 15% of the population experiencing homelessness in King County is particularly grave when compared to the 1% of the King County population who identify as AIAN. Native Hawaiian and Pacific Islander were combined into one category, so it is not possible to extrapolate exact homelessness numbers for the Native Hawaiian population from the PIT count. In 2020, Native Hawaiian or Other Pacific Islanders made up 4% of the population experiencing homelessness in King County, as compared to making up 1% of the overall population of King County. There is also a section for “Multiple Races,” which likely additionally obscures the number of Native people experiencing homelessness in King County. One primary source of information for the PIT count of sheltered people comes from the Homeless Management Information System (HMIS), a system used by homeless service agencies to report data on their services. A new data initiative put forth by Chief Seattle Club and the National Coalition to End Urban Indigenous

²³⁶ Washington State Department of Commerce, 2020

²³⁷ All Home King County, 2020

²³⁸ Chief Seattle Club, 2019

²³⁹ HHS Office of the Assistant Secretary for Planning and Evaluation, 2007

Homelessness will vastly improve the granularity of this HMIS data. As of October 2020, Tribal designations will be a part of the HMIS data collected by providers, including federally and state-recognized Tribes in the U.S., First Nations in Canada, Latin American Tribes, and currently unrecognized Tribes.²⁴⁰ However, because each county has its own HMIS system, this data initiative will only increase granularity in King County.

Whatcom County and Bellingham

Whatcom County, where Bellingham is located, also published its 2020 PIT count report. American Indian and Alaska Natives comprise 2.7% of the population of Whatcom County but make up 8% of the population of people experiencing homelessness. Native Hawaiians and Other Pacific Islanders make up 0.1% of the population of the county but 1% of the PIT count. However, 22% of those counted in the PIT count did not divulge their race, which could substantially impact these numbers. Many Native people experience or re-experience trauma at the hands of institutions or institutional processes, so many may choose not to divulge their backgrounds due to past experiences when using culturally insensitive services or in dealings with law enforcement or other authorities.²⁴¹

Spokane County

Spokane County also released its PIT numbers for 2020. Those who identify as American Indian or Alaska Native make up less than 2% of the population of Spokane County but account for 12% of the population of people experiencing homelessness, according to the PIT count. Native Hawaiians and other Pacific Islanders make up 0.5% of the population of Spokane County, but 2% of the population experiencing homelessness.²⁴²

According to the most recently available HUD PIT count data from 2020, AIANs made up **11.1%** of the overall homeless population, and Native Hawaiians or Other Pacific Islanders made up about 2.9% of the **homeless** population.²⁴³ Native Hawaiians or Other Pacific Islanders make up 2.6% of unsheltered homeless, while AIANs make up 18.1% of unsheltered homeless in Washington (see Table 19).

²⁴⁰ Brownstone, "After push from Native organizations, King County will add tribal affiliations to its homelessness database," 2020

²⁴¹ Whatcom County Coalition to End Homelessness, 2020

²⁴² Spokane City/County Continuum of Care Board, 2020

²⁴³ Washington State Department of Commerce, 2020

Table 19: Washington PIT counts, 2020

Race	Emergency shelter	Transitional housing	Safe haven	Unsheltered	Total
American Indian or Alaska Native	454 (5.3%)	133 (3.8%)	0	1,957 (18.1%)	2,544 (11.1%)
Native Hawaiian or Other Pacific Islander	254 (3%)	116 (3.3%)	<10	282 (2.6%)	~657 (2.9%)*
White	5,134 (60.2%)	1,823 (52.2%)	50	6,897 (63.8%)	13,904 (60.6%)
Black or African-American	1,836 (21.5%)	1,031 (29.5%)	24	1,062 (9.8%)	3,953 (17.2%)
Asian	152 (1.8%)	42 (1.2%)	<10	135 (1.2%)	~334 (1.5%)*
Multiple races	703 (8.2%)	350 (10%)	<10	481 (4.4%)	~1,539 (6.7%)*
Total	8,533	3,495	*	10,814	~22,931

Source: Washington State Department of Commerce Annual Point in Time Count, 2020

*Note: Data were not made available for many races for which there was one or more, but less than ten, individual(s) staying in a Safe Haven. Therefore, to get an approximate total for these groups, we used "5" to represent "<10"--so the true totals could be four more or for fewer individuals for each approximated racial group.

Impacts of COVID-19 on the 2020 PIT count

As illustrative as the 2020 PIT count may be for identifying the acuteness of urban housing need for Native people in Washington, the count occurred just prior to the onset of the COVID-19 pandemic, which had devastating economic and housing impacts generally, but especially for marginalized communities such as Native people. It is likely that the number of Native people experiencing homelessness in Seattle and King County has grown since the PIT count. Even without accounting for pandemic-related increases, it is difficult to infer information about the Native population as it relates to homelessness. Many reservations and Tribes do not participate in the PIT count, and in aggregate, most categories of homelessness broken out by race contain asterisks for the "American Indian or Alaska Native" and "Native Hawaiian or Other Pacific Islander" categories, indicating insufficient or missing data. When looking at the numbers of sheltered and unsheltered people by county—which does not contain demographic information—many counties that contain reservations have zeros or asterisks for their homeless counts. It is unlikely that these countries have zero people experiencing homelessness, and more likely, this reflects a lack of participation in the counts, which are difficult to conduct in more rural or sparsely populated areas. The sovereignty of Tribes, as well as a lack of federal funding going towards completing the counts, present difficult barriers for organizing the counts in Tribal areas. Of the 39 counties in Washington, 19 counties contain reservations. Seven of the 19 counties containing reservations have zeros or asterisks for their homelessness count: Ferry County, Jefferson County, Klickitat County, Lincoln County, Okanogan County, Pacific County, and Pend Oreille County.

Compensation for the dam-related displacement of Tribal communities: Columbia River Tribes and Army Corps of Engineers

Through the treaties of 1854 and 1855, the Tribes who lived along the Columbia River Basin gave up wide swathes of their land but reserved the right to fish at their customary fishing areas. There were attempts to overturn these fishing rights in 1905 and 1919, but the United States Supreme Court upheld them. These fishing rights were ultimately disrupted in the 1930s, with the construction of four dams on the Columbia River. The dams flooded out the sites of ancient Native villages along the river shore. Congress directed the U.S. Army Corps of Engineers (USACE), who constructed the dams, to acquire private lands to restore Native access to their fishing grounds and to provide infrastructure for the construction of new fishing facilities and living areas. While funding was provided to relocate white residents in the areas affected by the dams, Tribal families did not get the same relocation assistance and were displaced. A 2013 “fact-finding review” report attempted to identify the extent of the destruction caused by two of the four dams and estimated that between 44 and 85 Native families never received any relocation assistance (U.S. Army Corps of Engineers, Portland District, 2013). Alternate treaty fishing access sites were finally completed in 2011, 80 years after the dams were built, but funding for building housing for displaced Tribes was not granted.

The report describes generally how the Tribes had, and continue to have, multiple residencies, depending on the season or availability of traditional foods and other resources, and how these were disrupted by modern transportation, navigation, and hydroelectric dam projects. Figures in the report show villages and housing areas before the reservoirs covered them. The report is based on historical information gathered from documents and interviews. The report finds a considerable gap between the number of displaced families given by Census counts, on the low end, and accounts given by interviewees on the high end.

Treaties with the U.S. government made by Columbia River Tribes in the 1850s established reservations for exclusive Tribal use and the right to access certain larger areas that they had long been accustomed to using. Starting with construction and operation on the Bonneville Dam in 1937, the report describes how Tribes, who negotiated treaties with the U.S. in the 1850s to retain access rights to the Columbia River and other areas, were dislocated when the reservoir behind the dam permanently covered their villages and dwellings. In 1939 U.S. Army Corp of Engineers came to an agreement with the Tribes to build five new fishing sites in lieu of what was lost in the Bonneville flood. Relocation of village residents was not addressed in the agreement. By 1957 The Dalles dam was constructed and operating about 45 miles upriver from Bonneville. About 25 miles upriver from The Dalles Dam, the John Day Dam was constructed and operational by 1971. In 1972 four Treaty Tribes--Yakama, Warm Springs, Umatilla, and Nez Perce settled with the U.S. Government to add more fishing sites in lieu of those lost to the construction of dams. Relocation housing assistance was not addressed. Documentary evidence in the report showed that 41 families from three villages lost dwellings to the Bonneville pool, and The Dalles pool covered two villages of about 35 families. The impact of the John Day dam pool on Tribal dwellings is not addressed in the report but is identified as a future study need. Seasonal and permanent residences along the dam pools are in use today.

The report found that there were Native American families dislocated by the dam reservoirs but received little or no relocation assistance. In 1988, Public Law 100-581 authorized the development of Columbia River Treaty Access Sites and resulted in 31 new fishing sites and replaced 15 houses.

The report describes how the number of village residents would fluctuate depending on the season. Villages practiced seasonal migrations with variations depending on individual roles within the social structure. Temporary buildings were assembled during peak fishing, hunting and gathering times and then disassembled and stored after the harvest. There were also storage areas for personal items not needed for seasonal

migrations. Trade specializations sometimes required a broader seasonal migration area, for example, to the coast or other mountainous regions that were the usual and accustomed residence of other Tribes. In the winter, villages would move to the hillsides for protection from cold winds. In the summer, villages would move back toward the river and use the winds to help dry fish. In early fall, camps were made in the hills and mountains for easy access to other primary foods and hunting. Land that was not in seasonal use might appear abandoned to someone unaccustomed to the life pattern of the area. Residency and land stewardship rights were passed down by families and distributed depending on family size and available resources.

After the construction of the dams, many Tribes and families relocated to reservations for various reasons, including declining fish runs, lack of shelter, no employment, and racial hostilities. Reservations further enticed relocation by providing health care, jobs, modern housing and educational opportunities.

Appendix C: Methodology

Identification and invitation of project stakeholders

In order to provide structure for the data collection effort and acknowledge their primary role in defining Native housing needs and barriers, project coordinators determined that Native housing providers would serve as the primary stakeholders for this effort and that individuals, organizations and agencies providing support or guidance to Native housing providers would be invited to serve as members of an Advisory Group that would complement and add technical context for the information provided by the stakeholder group. An initial message describing the project and containing an attached project fact sheet was sent to stakeholders on March 5, 2020. Additionally, project coordinators attended the Affiliated Tribes of Northwest Indians winter meeting in Portland, Oregon and the Northwest Indian Housing Association meeting at the Skagit Casino in Bow, Washington, during the final week of January. Advisory Group members were initially selected by stakeholders during subsequent monthly calls and via direct phone or email communications, and project coordinators supplemented this list via direct invitations to additional organizations to ensure that these knowledgeable sources and essential organizations could contribute to collaborative discussions, provide valuable information via the survey instrument, and enhance the comprehensiveness and technical sophistication of the resulting findings of this study. While several in-person meetings were scheduled throughout the year-long study, including at a national Tribal housing convention that was to have been hosted by the National American Indian Housing Council in Seattle, the convenings for this project were ultimately limited to a virtual environment as a result of the COVID-19 pandemic.

Monthly stakeholder calls

In order to keep the large group of stakeholders involved and informed, a monthly conference call was scheduled. Each monthly call focused on specific housing issues, starting with emergency shelter, transitional housing, and permanent supportive housing in June and low-income rental housing development in July. A survey Q&A call was held instead of the August meeting, and the NWIHA meeting presentation served as the September meeting. October's meeting focused on homeownership programs, while November's meeting looked at funding options. Relevant agency representatives were invited to meetings in order to participate in the conversation and to present any new progress or initiatives that may affect Tribes or Tribal funding.

A draft of the report was made available to stakeholders for feedback on Feb. 3, 2021.

Web-based project resources

Throughout the study process, all project resources were made available on the study's designated website, nativehousingwa.org. These resources included notes from monthly calls, study briefing sheets and next steps, pdfs from conference presentations, project timelines, stakeholder lists, contact information, and links to all of the surveys through which important housing data was collected. A submission and inquiry form was also included on the project webpage in order to allow for easy correspondence by anyone interested in joining the study efforts.

Literature review and analysis of existing data sources

To ensure that this study was both comprehensive and not duplicative of prior research or data collection efforts, project coordinators developed a universe of existing literature and data sources to be obtained, reviewed and incorporated into this study for purposes of narrowing new data collection efforts and adding critical context to the discussion of housing needs and barriers to the development of Native housing in

Washington. Prior research included a federal study evaluating the HUD-administered Tribal housing program, an assessment of housing need at the state level (which was subsequently updated), and a county-level assessment of American Indian and Alaska Native housing needs, and other studies and reports summarizing Native housing issues and the inclusion of Tribes and Native organizations in local and state-level planning processes.

While many data sources that are traditionally used to quantify and assess housing stock and housing markets at the city, county or state level do not properly target, distinguish or even include housing located on Indian reservations or that is available to members of urban Native communities, a number of existing data sources, including decennial Census and American Community Survey data, were compiled and analyzed to provide additional context and to enable project coordinators to compare this data with the data collected directly from the Tribal housing entities and Native organizations. Project coordinators obtained the most recent Indian Housing Plans and Annual Performance Reports submitted to HUD's Office of Native American Programs by the 29 Tribal housing entities via a Freedom of Information Act (FOIA) request in order to efficiently gather information about completed and planned program activities for all of these entities and to lower the survey response burden for these entities by excluding survey questions already answered by information contained in these documents.

Surveys: housing providers and advisory group members

Three online surveys were deployed for the project data collection. One survey was sent to housing providers in the state, which included both Tribally Designated Housing Entities (TDHEs) and urban Native housing providers. The Advisory Group survey was sent to stakeholders who provide services and other support to Native housing providers, such as consultants, lawyers, and lenders. There was also a survey for Native Hawaiian, Alaska Native, and non-federally recognized Tribes in order to capture more open-ended response information from those communities.

The surveys were created with input and direction from the stakeholder group of housing providers and advisory group members. Draft surveys were distributed digitally, and survey review sessions were conducted during the monthly call meetings. The finalized online survey links were distributed on June 29 with a targeted survey close date of August 7. A survey Q&A session was held after the release of the links in order to answer any questions that may have come up for survey participants. While the survey Q&A session had an engaged group in attendance, it did not result in survey completions. Due to the Covid-19 pandemic and associated office closures and stay-at-home orders, survey response in the allotted five weeks was not sufficient. The survey deadline was extended to the end of September to allow for additional time during an extremely busy and stressful time for housing entities. The extended deadline for the survey was set to be directly after the virtual Fall conference of the Northwest Indian Housing Association. At the fall conference, Big Water Consulting presented an update of the project with initial findings and announced that it would host a virtual survey workshop the following week in order for housing providers to ask questions and work through the survey with the help of the project leaders. Despite the open forum of the survey workshop, attendance was limited and generated few survey completions. The survey team emailed and called housing providers with frequent reminders and requests to fill out the survey, offering one-on-one sessions to walk survey respondents through the questions. Multiple separate reminders and requests for participation were sent out to NWIHA members by NWIHA leadership through their listserv. Despite the many points of contact and offers of guidance and support, only 12 of 29 Tribal housing entities completed their surveys, with another six entities who began but did not complete their surveys. 11 TDHEs did not participate in the survey at all. Five out of six participating urban providers completed their surveys, with one incomplete survey (Chief Seattle Club). Of the

eleven non-Washington members of NWIHA, two completed their surveys, two started but did not complete, and seven did not start.

Certain data points were deemed as essential to the project, specifically for data that could not be accessed anywhere else. An abbreviated six question survey was compiled and sent to non-responding TDHEs via email in-text and as a pdf in an effort to collect complete information on these vital data. This vital data includes waiting list numbers, the total number of rental and homeownership units managed by the Tribe, average rent charged by the housing entity, approximate number of people experiencing homelessness and in shelters, number of units planned for development in the next five years, and non-IHBG sources of funding for the housing entity. Many of these pieces of data are incompletely available through sources such as a Tribe's APR, which only accounts for HUD-funded projects and housing units. Because HUD funding is typically insufficient to meet Tribes' housing needs, Tribal housing entities have had to get creative in terms of procuring additional funding, and only capturing data on HUD-funded units would not present a complete picture of either housing need nor the innovative ways that Tribes have found to provide their members with safe and sanitary housing outside of the traditional funding mechanisms available to them. This data is not available from any other source, as illustrated by the fact that APR HUD-funded unit totals did not match unit totals collected by the survey in almost every instance. And, because many Tribes do not participate in PIT Counts for homelessness, collecting homelessness data from Tribes directly is important to understanding housing needs. Waiting list numbers are similarly informative, and there is no other data source for waiting list data outside of the Tribes themselves. The abbreviated survey generated six additional responses for a total of 22 participating Tribes.

Focus groups

Meetings with Tribal housing authority staff were intended to coincide with larger in-person meetings and conferences that were planned throughout the study timeline, such as Northwest Indian Housing's quarterly meetings. Also planned were in-person focus groups consisting of various community members. However, these plans had to be restructured in light of the cancellation of in-person meetings due to COVID-19. In response to the pandemic, focus groups of stakeholders and advisory group members were held virtually.

Due to the large body of stakeholders and the wide array of participants, the stakeholder group was divided into subgroups. Tribes were divided into regional subgroups, with subgroups for Puget Sound/I-5 Corridor, Coastal/Peninsula, and Eastern Washington/Columbia River. There were additional subgroups for urban housing providers, Native Hawaiians, Alaska Natives, and the advisory group. An attempt was made to contact non-federally recognized Tribes and create a subgroup of Tribal leaders from that community, but only the Duwamish Tribe responded to contact attempts. The focus groups were each two hours in length and were conducted via Zoom online conferencing to accommodate CDC Covid-19 social distancing guidelines, as well as the remote location of many of the focus group participants. While in-person gatherings have many advantages, members of more remote Tribal areas expressed that the rise of virtual meetings had increased their ability to participate in statewide efforts.

Interviews with knowledgeable sources

Interviews were conducted in order to fill in specific gaps in data collected through the surveys and focus groups. Many of these gaps in knowledge were about specific programs or resources, so experts in these specific areas were contacted for further discussion.

Project coordinators interviewed:

- Darkfeather Ancheta, a staff member of 1st Tribal Lending

- Lorna Fogg and Robin Thorne, consultants with RTHawk Housing Alliance LLC, a Native-led housing consultancy
- Ed Goodman, a lawyer from Hobbs Strauss Dean & Walker who works with many Washington Tribes
- Diana Phair, Executive Director of the Lummi Housing Authority
- Tom Carney, Iris Friday, and Kirsten Franklin-Temple, staff of HUD's Northwest Office of Native American Programs
- Colleen Echohawk, Executive Director of Chief Seattle Club
- Andrei Jacobs and Amanda Paschall from Tacoma Rescue Mission
- Emily Burgess, the Homeless Housing Performance Manager for the Washington State Department of Commerce
- Bob Peterson, Manager of Multifamily Housing & Community Facilities at Washington State Housing Finance Commission
- Tedd Buelow, National Native American Coordinator at USDA Rural Development
- Jennifer Ramirez Robson, Director of Resident Services at King County Housing Authority
- Paul Lumley, Executive Director of the Native American Youth and Family Center (NAYA)
- Dave Castillo, CEO of Native Community Capital
- Susan Anderson, Senior Director at Enterprise Community Partners
- Brian Lloyd and Beth Boram, planners with Beacon Development, an affordable housing project consulting firm that works with nonprofits and housing authorities

Expansion of survey to include all NWIHA members

In working with NWIHA, it became clear that a Washington TDHE data set would be insufficient for the needs and interests of NWIHA, which serves the entire Northwest. The study organizers agreed to expand the scope of the housing provider survey to all Northwest Tribes, including those located in the states of Idaho, Oregon, and Alaska. The resulting dataset would represent all NWIHA members and the entire Northwest.

Unfortunately, due to very limited response from TDHEs overall, a comprehensive data set was not possible. Of the 11 members of NWIHA that are located outside of Washington, two completed surveys, two provided incomplete surveys, and the remaining seven did not participate at all.

Initial data compilation, cleaning, coding and analysis

Data collection was delayed due to limited survey response, but survey responses were compiled, analyzed, and coded. Pertinent information was included within this report, but due to a low response rate, not all the information collected could be included in this report.

Review of initial findings with stakeholders and advisory group members and solicitation of feedback

Initial findings were presented to stakeholders, and advisory group members at the Northwest Indian Housing Association's (NWIHA) fall meeting on September 23, 2020. A draft of the report was provided to stakeholders and advisory group members in January 2021 to allow them to provide feedback to project coordinators.

Drafting of the final written report

The final written report was written by project coordinators, with a draft provided to stakeholders and advisory group members for review and comment.

Presentation of findings, visualization and report to stakeholders, advisory group members, client, and public

A presentation of findings, data visualizations, and tables was provided virtually to stakeholders, advisory group members, and the Washington State Department of Commerce in February 2021.

Lessons learned during the study

The survey was created and reviewed by the very same group that was tasked with filling it out. However, this did not seem to significantly increase the survey response rate. If a statewide Native housing needs assessment is to be done again, a few changes may make the survey more effective. Though survey length was a consideration throughout the survey design process, its length and organization may have led to fewer responses. The survey had 10 sections, which were organized by category: background (contact info and services provided), local economic conditions, housing availability and unmet need, housing management and development, homeownership programs, types of housing provided/needed, external partners, housing challenges and successes, program experience, and leveraging funding sources. Over the course of the project, it became clear that housing directors may not have all of the information asked by the survey at their disposal. In hindsight, it may have been advantageous to make the survey shorter and to section it by department rather than overall topic, for example, occupancy, grants and funding, maintenance, etc. However, the size of the survey does not entirely account for the lack of response, as even the abbreviated six question version of the survey went unanswered by numerous TDHEs.

One potential fix for the lack of buy-in for completing the survey would be to bring in stakeholders and the advisory group earlier in the process. Developing the project itself in coordinator with stakeholders and advisory group members would create and establish the value of the project, as well as provide opportunities for feedback on the project goals and methods. It became clear during attempts to engage certain stakeholders that some communities, most notably the Native Hawaiian communities, did not see the utility of their participation. Clarifying the potential for systemic change for communities in which services and funding are not currently available could help with engagement for those stakeholders who may not be in paid positions and engage in general advocacy work on a volunteer basis.

One method to shorten the survey would be to assess the limitations of various existing data sources and to develop a strategy upfront for creating a comprehensive data set that would avoid duplication or reliance on irrelevant data. The most useful qualitative data came from focus groups and interviews, which were able to create a more conversational atmosphere based on information sharing and problem solving rather than tasking a staff member with summarizing frustrating barriers on paper.

A positive lesson learned was the utility and importance of bringing the regional subgroups together in conversation, such as during focus groups or through specific topic-oriented monthly calls. These virtual gatherings allowed participants to share common experiences, valuable information and resources, and even to strategize about future collaborations. Stakeholders frequently spoke of the importance of these meetings to their own work, especially for housing directors new to their positions. The focus groups and monthly calls served as networking opportunities as well as opportunities to discuss shared burdens and difficulties faced only by other Tribal housing directors or regionally specific issues faced by numerous Tribes in a particular area. Consultants, lenders, and agency representatives were able to share news and information about funds and programs available to TDHEs, as well as to learn from housing directors what barriers prevent their programs from being fully utilized or accessed.

Appendix D: Data sources

List of data sources used

Census data

The U.S. Census Bureau collects data beyond the decennial census—it collects additional needs-based information (including income and housing conditions) in the American Community Survey as well as housing structure-specific data in the American Housing Survey. As noted in the limitations section of this survey, ACS and other data may not fully describe the level of need among AIAN and Native Hawaiian populations.

American Community Survey and Census Data describing populations:

<https://data.census.gov/cedsci/>

American Community Survey Public Use Microdata Sample Files (individual response and weight-related data that is anonymized):

PUMS - <https://www.census.gov/programs-surveys/acs/microdata/access.html>

American Housing Survey:

<https://www.census.gov/programs-surveys/ahs.html>

Historical Census Data:

National Historical Geographic Information System - <https://www.nhgis.org/>

Available Census APIs (allowing for programmatic pulling and analysis of Census data):

<https://www.census.gov/data/developers/data-sets.html>

My Tribal Area (selected American Community Survey data in Tribal areas):

<https://www.census.gov/Tribal/>

HUD data

Data collected and reported by HUD include program-specific data, including the number of people served by particular programs as well as their race(s), as well as information regarding Fair Market Rents (FMRs) and Median rent. See the below links to HUD datasets.

Point-in-Time Counts of Homeless Reports:

<https://www.hudexchange.info/programs/coc/coc-homeless-populations-and-subpopulations-reports/>

Housing Inventory Count Reports:

<https://www.hudexchange.info/programs/coc/coc-housing-inventory-count-reports/>

HUD Picture of Subsidized Housing (by state):

<https://www.huduser.gov/portal/datasets/assthsg.html>

HUD Fair Market Rent:

<https://www.huduser.gov/portal/datasets/fmr.html>

HUD 50th percentile rent:

<https://www.huduser.gov/portal/datasets/50per.html>

HUD Low-Income Housing Tax Credits:

<https://www.huduser.gov/portal/datasets/lihtc.html>

IHBG Formula Funding Data:

https://www.hud.gov/program_offices/public_indian_housing/ih/codetalk/onap/ihbgformula

IHP and APR Data for Washington Tribes were obtained through FOIA requests submitted to HUD:

https://www.hud.gov/program_offices/administration/foia/requests

USDA data

USDA Data, including 502 Guaranteed Loans, 502 Direct Loans, Section 515 and 514 multi-family loans, and Section 504 Home Repair loans, are available from USDA's open data catalog at the link below. More recent and up-to-date information was also collected from agency staff.

<https://www.usda.gov/content/usda-open-data-catalog>

National Center for Homeless Education

This site includes links to extensive data regarding homelessness, beyond HUD's Point-in-Time (PIT) data, including data on homelessness among students and in schools. PIT counts may be unreliable and, as noted in this report, may not fully capture the number of people experiencing homelessness.

<https://nche.ed.gov/data-and-stats/>

Home Mortgage Disclosure Act (HMDA)

This loan dataset shows the location and race-related data for loans that were collected and applicable. Unfortunately, because smaller and more rural institutions are not required to report, some home loans to AIANs living in rural areas may go unreported in this data set (as noted in the report).

<https://ffiec.cfpb.gov/data-browser/data/2019?category=states&items=WA>

Washington-specific data

Washington Center for Real Estate Research

WCRER has very quarterly reports, including median real estate prices by county, as well as prices and vacancies for rentals by county, for available counties in Washington.

<https://wcrer.be.uw.edu/archived-reports/>

Washington State Housing Finance Commission

This site has information about multi-family housing funding, including recent winners of Low-Income Housing Tax Credits. <https://www.wshfc.org/mhcf/index.htm>

Washington Office of Financial Management

The Office of Financial Management maintains data and estimates, including Washington population-related data.

<https://ofm.wa.gov/washington-data-research/population-demographics>

Washington State Department of Commerce

The Washington Department of Commerce has historic programmatic data, including awards, Annual PIT counts, and other housing-related data. In addition to the Housing Trust Fund and Low-Income Housing Tax Credits, the Washington State Department of Commerce has dozens of additional programs that help fund the development and preservation of safe and energy efficient housing as well as provide for essential community

needs such as victim services, community buildings, rural broadband, and more. A full list of Commerce's programs, and related public data, across its five divisions (Community Services and Housing, Energy, Local Government, Office of Economic Development and Competitiveness, and the Director's Office) is available on its website below.

<https://www.commerce.wa.gov/building-infrastructure/housing/>

Planning documents

Akana helped source numerous city, county and regional planning documents used to help inform this study. Those are listed on the following pages, along with key findings and the scope of each reviewed document and links to each document. Some documents include information from local surveys, interviews, focus groups, and meetings.

Appendix E: Funding programs summary table

As an additional resource for Tribes, TDHEs, and other Native organizations, study coordinators have created a dynamic summary table of housing-related funding programs that are available to Tribes and Native nonprofits.

The funding program summary table can be found on the study website: NativeHousingWA.org