


MEMORANDUM

April 8, 2022

TO: TRIBAL HOUSING CLIENTS

FROM:  Ed Clay Goodman and Cari L. Baermann
HOBBS, STRAUS, DEAN & WALKER, LLP

RE: **HUD-ONAP Virtual Housing Summit**

On April 6 - 7, 2022, the National American Indian Housing Council (NAIHC) in partnership with the U.S. Department of Housing and Urban Development's (HUD) Office of Native American Programs (ONAP) hosted a Virtual Housing Summit to provide housing program and funding updates and share best practices in tribal housing. This memo provides a summary of the information shared during the Summit.

I. ONAP Updates (Day 1)

Bill Picotte, NAIHC Deputy Director, provided an invocation and *Tony Walters, NAIHC Executive Director*, gave brief opening remarks.

The first speaker was *HUD ONAP Deputy Assistant Secretary Heidi Frechette*. DAS Frechette began by noting that COVID-19 has pushed HUD into a number of innovations, particularly in the use of Information Technology and remote meetings/trainings. They have been developing both hybrid and remote working options for HUD staff, with the full support of leadership. She also noted, however, that she has heard loud and clear from Indian Country of the need to return to in-person training and technical assistance. As a result, DAS Frechette announced that HUD ONAP is now moving back to in-person training and technical assistance, while still providing options for remote contact. One of the areas that they want to focus on in the immediate-term is to assist tribes and tribally designated housing entities (TDHEs) in maximizing the use of funds appropriated under the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) and American Rescue Plan Act (ARPA) legislation.

DAS Frechette wanted to emphasize a message going forward of "hope and determination." She pointed to the substantial gains that tribes made in housing appropriations in the Fiscal Year (FY) 2022 appropriations, which secured over \$1 billion in funding for tribal housing programs. She also noted that President Biden has just released his proposed budget for FY 2023, which contains additional increases in funding for tribal programs.

DAS Frechette remarked that HUD has taken a number of steps to increase meaningful consultation with tribes. This includes creating a Tribal Intergovernmental Advisory Committee (TIAC) by publishing a Federal Register Notice (FR-6289-N-02) that formally establishes the TIAC. The Notice invites Tribes to nominate Tribal representatives to serve on the TIAC. Nominees must meet the criteria described in the Notice and nominations must be submitted by May 31, 2022. To submit a nomination, tribes may go to [Regulations.gov](https://www.regulations.gov), press the blue Comments button, and then either upload a document or type a comment in the box that appears. Decisions on nominations to the TIAC will be made by October, 2022.

Associate Deputy Assistant Secretary Gary Cooper, ONAP, gave brief remarks about HUD's efforts over the past year to do outreach to and consultation with tribes and TDHEs.

Jad Atallah, ONAP Director of Performance and Planning, provided an overview of the annual appropriations for FY 2022 that was recently passed. As we have reported in previous memoranda, on March 15, 2022, President Joe Biden signed the Consolidated Appropriations Act of 2022, a \$1.5 trillion omnibus spending package. The bill provides \$1,002,806,000 for Native American programs, to remain available until September 30, 2026. The bill also includes a 21% increase in funding for Native American Housing Assistance and Self-Determination Act (NAHASDA) programs.

Mr. Atallah remarked that HUD will be requesting additional expenditures and program changes for the President's 2023 Budget to further improve tribal housing. One of the changes HUD is seeking is to expand tribal access to mortgage programs across the entire United States. HUD is also seeking to increase the loan terms to up to 40 years for the Section 184 and 184A loan programs. A third change that HUD is requesting is the elimination of the requirement that organizations be a Community-Based Development Organization (CBDO) to be eligible to receive loans.

Hilary Atkin, ONAP Director of Grants Management noted that ONAP Grants Management has hired a number of new people to work on tribal grants. ONAP is focusing on the following priorities:

- Sending the funding out;
- Grants Evaluation and Management System (GEMS); and
- Training staff and building and aligning processes to better serve tribes.

Ms. Atkin provided an update on various HUD grants. For the IHBG Formula grants, the IHBG FY 2022 final formula allocations will be posted online by May 13, 2022. The IHBG FY 2023 estimate formula allocations will be posted online by June 1, 2022. ONAP anticipates announcing additional ICDBG-ARP awards this coming summer. HUD will be announcing the FY21 IHBG Competitive awards soon and will likely publish the FY22 Notice of Funding Opportunities (NOFO) this summer.

For the Tribal HUD-VASH, HUD has published the Renewal Notice published and will

be announcing awards this summer. Additionally, HUD will be issuing expansion NOFO awards early this summer. For ICDBG grants, the FY21 awards will soon be announced and the FY22 NOFO will be published this summer. The Indian Community Development Block Grant Imminent Threat Funding (ICDBG-IT) applications are being considered on a first-come, first-serve basis.

The ONAP staff provided the following contact information for the various grant programs:

- IHBG Formula: IHBGformula@firstpic.org;
- Pandemic relief: ICDBGARP@hud.gov; icdbgcars@hud.gov;
- IHBG competitive: IHBGCompetitiveprogram@hud.gov;
- Tribal HUD-VASH: TribalHUDVASH@hud.gov;
- ICDBG: ONAP-ICDBG@hud.gov.

Gary Nemeec, ONAP Director of Grants Evaluation, remarked that the onsite grant monitoring that was paused during the COVID-19 pandemic will soon resume. HUD will continue remote monitoring along with conducting onsite monitoring. HUD is also preparing for site visits to address COVID-19 concerns and will follow tribal COVID-19 health and safety protocols.

HUD is also involved in the Tribal Housing and Related Infrastructure Interagency Task Force (THRIITF). In 2019, Congress directed HUD to establish the THRIITF to:

- renew environmental laws and authorities;
- explore whether environmental reviews could be expedited if agencies funding similar types of projects in Indian country developed alighted categorical exclusions; and
- identify specific regulatory and policy improvements.

HUD has participated in consultation seminars and is finalizing plans for the THRIITF in the coming weeks. As the THRIITF is implemented, HUD will be providing tribe-specific training.

For CARES Act quarterly reporting requirements, Section 15011 of the CARES Act requires quarterly reports of activity-level information. Due to troubles with the reporting portal, ONAP has decided that it will not be collecting quarterly reports for CARES Act grants. However, tribes should still maintain records on expenditures and tribal CARES Act-funded programs in case ONAP needs this information in the future.

Brian W.W. Cook, ONAP Director of Headquarter Operations, remarked that ONAP continues to offer training and technical assistance (TTA) to tribes. ONAP has five providers: Association of Alaska Housing Authorities, FirstPic, Local Initiatives Support Corporation, NAIHC, and Technical Assistance Collaborative. ONAP has provided 53 trainings during 2020; 70 trainings in 2021; and HUD has schedule 181 trainings in 2022. ONAP does plan to offer both in persona and virtual for TTAs for 2022. Additionally, HUD is planning to hold an in-person summit in March 2023.

Krisa Johnson, ONAP Director of the Loan Guarantee Program, noted that HUD is

continuing to improve and develop its Loan Guarantee program to better serve tribes. This includes rolling out HUD's loan program Native Advantage in January, 2022 and serving hundreds of families through the Section 184 Loan Program. HUD plans to increase the ability of homeowners to defer the amount of their forbearance of 184 loan terms and provide numerous tools to help families modify their loans. In 2022, HUD added ten new lenders to the Section 184 Program. Other changes include also proposing changes to HUD's loan limits and updating HUD's Section 184 regulations. HUD expects to publish a proposed rule by end of FY22.

II. Panel Discussions (Day 1)

A. Utilizing CARES Act and ARPA Funding for Housing.

The panelists were *Jacqueline Pata, President/CEO, Tlingit-Haida Regional Housing Authority; Floyd Tortalita, Executive Director, Pueblo of Acoma Housing Authority; Neil Whitegull, Executive Director, Ho-Chunk Housing and Community Development Agency.* They first commented on how their housing programs implemented their CARES Act and ARPA funding. Some of the programs focused on helping homeless youth, while others constructed new homes for tribal members, coupled with providing training on housing financing. They also reduced overcrowding, improved ventilation systems, and provided numerous cleaning, sanitation, and health resources to tribal members and youth to maintain safety during the pandemic. The panelists further noted that their programs focused on helping tribal members outside of their service area across the country during the pandemic. They also coordinated with their health department to create a food distribution program for the community to allow tribal members to isolate during the pandemic.

The panelists also remarked on some of the challenges they faced in implementing housing programs during the pandemic. Some tribes faced the hindrances of limited access to outside entities because of quarantines. Other tribal housing programs faced challenges in implementing programs, such as reduced options for transporting housing materials. The panelists noted the increased workload that housing staff faced in implementing CARES Act and ARPA funding, in addition to implementing the normal tribal housing programs.

Finally, the panelists talked about the next steps their tribal housing programs will be taking to transition out of the pandemic. Efforts include encouraging tribal members to receive booster shots and ensuring their internet is working so that tribal members still had access to the housing program resources. The panelists also noted their efforts to help with economic recovery to help both the tribal community and the tribal members individually get back on their feet after the pandemic.

B. Stepping Up: Best Practices from Tribal Housing Programs

The panelists, *Susan Schrader, Emergency Rental Assistance Program Director, Oglala Lakota Housing Authority; Ama Tuato'o, Executive Director, Muckleshoot Housing Authority; and Bobby Yandell, Executive Director, Choctaw Nation Housing Authority*

remarked on strategies their tribes and tribal housing programs implemented to respond to the pandemic and lessons learned. The panelists commented that they partnered with the state housing programs to allow tribal members to obtain state funding through the U.S. Treasury's Emergency Rental Assistance program (ERAP) funding. They also provided assistance to non-tribal Native Americans outside of the tribe's service area.

Ms. Tuato'o commented that the Muckleshoot Housing Authority focused on assisting tribal members by providing funds to bridge the difference between their income and the rent due for their homes. She commented that the Housing Authority used housing templates created by Hobbs, Straus to quickly implement ERAP funds. They have also focused on rapidly building new homes, such as for elders and veterans, and using the Tribe's loan program (through which they process loans in-house) to provide loans to tribal members. The Tribe also helps tribal members by matching the amounts tribal members are able to spend to allow them to purchase cars, repair credit, or assist with rent. She also remarked on her Tribe's increased focus on assisting the unsheltered individuals by providing mental health support. She noted that supportive housing and case management are key to helping unsheltered individuals become self-sufficient and ready to live in homes and pay rent. Finally, she remarked that the Muckleshoot Housing Authority intends to continue efforts to provide mortgages to individuals on both tribal and fee land and continue their bridge program and supportive assistance program for unsheltered individuals in the future.

One of the panelists noted that their Tribe focused on providing funding to tribal members both on the reservation and who live across the United States. The Tribe used a third-party vendor to process and streamline the payments for rent and utilities. They also changed their application process to be completely online and paperless. Other panelists commented on the critical step they took of learning how to work remotely and still implement their housing programs successfully during the pandemic. This included using CARES Act funding to purchase new computers to allow staff to work from home.

C. Honoring all Relatives: Addressing Gender-based Violence during the Pandemic

This panel was moderated by *Michelle Sauve, Executive Director of the U.S. Department of Health and Human Services (HHS) Secretary's Intradepartmental Council for Native American Affairs*. Ms. Sauve commented that the Biden Administration is focused on addressing gender-based violence (GBV). The panelists, *Caroline LaPorte, Director of the Tribal Safe Housing Center, National Indigenous Women's Resource Center; Jolene Holgate, Training and Education Director, Coalition to Stop Violence Against Native Women; and Elizabeth Fisherman, Housing Director, Flandreau Santee Sioux Housing Authority* discussed programs and tools they have developed to address gender-based violence and domestic violence (DV). One of the panelists commented that their program provides training and technical assistance to GBV and DV programs to enable them to better provide direct service

to those in need. They noted the importance of ensuring that victims of GBV and DV have access to safe housing and shelters and health and sanitation resources.

The panelists commented on how tribal housing programs can step in when there is GBV or DV in the home. They noted the importance of tribal housing programs structuring their policies so that the victims are not punished or evicted because of the violence of another person. One panelist remarked that including tribal leaders in the efforts to address GBV and DV can also make a difference.

III. Treasury and ONAP Updates (Day 2)

The meeting began with greetings from NAIHC Deputy Director Bill Picotte and NAIHC Board member Adrian Stevens.

The first speaker was *Josh Jackson, Policy Advisor in the Office of Recovery Programs at the Department of Treasury*. He gave an update on Tribal Housing Recovery Funds. Mr. Jackson began by summarizing the various funds that were provided to tribes through various programs aimed at recovery from the COVID-19 pandemic. He then turned to the Emergency Rental Assistance (ERA) Program. He summarized the funding amounts and ERA Program general requirements, including the recapture and reallocation procedures released last week (see our memo dated April 6, 2022 for details). He noted that based on government-to-government consultation, there were certain tribal-specific accommodations made to provide additional flexibility to tribes throughout the ERA Program process, including modified reporting requirements specific to tribes. After briefly highlighting the successes of several tribal ERA Programs, he outlined the various resources that Treasury has made available to tribes. There is a Treasury website with tips and applications. <https://home.treasury.gov/coronavirus/assistance-for-state-local-and-tribal-governments/emergency-rental-assistance-program/service-design>.

Following that discussion, Mr. Jackson moved briefly to the Homeowner Assistance Fund (HAF) Program. He noted that Treasury engaged in consultation with tribes on the development of the tribal-specific components of the HAF Program. Treasury is “working quickly” to approve those HAF Plans that have been submitted, which will allow applicants to receive the second payment of 90% of the HAF Program funds. The next step is to issue HAF reporting guidance and tribal compliance training.

Next up were presentations by the Regional Administrators from Office of Native American Program (ONAP) offices around the United States.

Greg Stuckey, Alaska ONAP Regional Administrator, gave a short presentation on the use of Indian Community Development Block Grant (ICDBG) funding in Alaska. There were a number of ICDBG-CARES and ICDBG-ARPA projects funded in Alaska. 60% of the ICDBG-

CARES awards involved new construction, including “tiny homes” construction. Projects also involved pantries, infrastructure, and temporary shelters (homeless, domestic violence, juveniles). Almost 60% of the ICDBG-ARPA projects also involved new construction, again with an emphasis on tiny homes. The infrastructure projects involved mostly sewer and water. A number of the projects involved communities threatened by climate change, utilizing the funds to address those impacts.

Tom Carney, Northwest ONAP Regional Administrator, first noted that the Northwest ONAP Grants Evaluation Director, Julie Kander, passed away earlier this week, and he thanked everyone for the kind words and condolences. He also focused on ICDBG-CARES and ICDBG-ARPA in the Pacific Northwest. A little over a third of the Pacific Northwest tribes received awards under ICDBG-CARES, and nearly one-half received awards under ICDBG-ARPA. He gave examples of just a couple of projects. The Muckleshoot Housing Authority received funds to develop and rehabilitate housing. The Coquille Indian Tribe purchased and remodeled a medical clinic in the Eugene, Oregon area, to serve its Tribal members in that area. Mr. Carney also briefly touched on IHBG-Competitive grants awarded in the Pacific NW. The Swinomish Tribe was the first completed IHBG-Competitive grant projects in the United States, a newly-constructed housing development.

Jody Moses, Southwest ONAP Regional Administrator, focused first on the IHBG-CARES and IHBG-ARPA funding and projects developed with those funds. Tribes were able to utilize these funds in creative and impactful ways. These funds involved significant administrative requirements, and tribes/TDHEs were able to meet these burdens and meet the needs of their members. She gave a couple of examples of successful projects in her region.

Randy Akers, Northern Plains ONAP Regional Administrator, also focused on success stories in the Northern Plains, specifically a project by the Turtle Mountain Chippewa Tribe in North Dakota. Like many tribes, Turtle Mountain is seeing a substantial increase in homelessness. The Tribe applied for and received an ICDBG-ARPA grant to protect homeless children in need of foster care and support. They will develop and construct a foster care facility for these children.

David Southerland, Southern Plains ONAP Regional Administrator, noted that they are currently hiring for a staff position. He noted the burdens that many tribes and HUD had to deal with as a result of COVID-19. It has been a really tough two years. There have been significant losses in tribal housing programs from COVID-19. He also gave brief summaries on the amounts received by tribes in his region under IHBG-CARES, ICDBG-CARES, IHBG-ARPA, and ICDBG-ARPA. There are dozens of examples of great projects, and he mentioned just a few: Cherokee Nation is developing housing for Cherokee elders and Cherokee speakers; Choctaw Nation of Oklahoma used funds to purchase three ambulances; Peoria Tribe constructed a food

pantry and distribution center; Citizen Band Potawatomi Nation is developing a treatment facility.

Mark Butterfield, Eastern Woodlands ONAP Regional Administrator, highlighted one ARPA project in his region: the Mississippi Band of Choctaw Indians. The Mississippi Band suffered a higher number of deaths per capita from COVID-19 than any other tribe in the Eastern Woodlands region, causing a severe impact on the Tribal community. As a result, they used IHBG-ARPA funds to plan for and construct new homes in eight Tribal communities to alleviate overcrowding. They are also planning on building tiny homes to allow for Tribal members to quarantine when infected by or exposed to COVID-19.

Claudine Allen, Lead Native Hawaiian Program Specialist, HUD ONAP, began with a “shout out” to the Department of Hawaiian Homelands (DHHL). DHHL was the first government agency to launch an emergency rental assistance program in Hawaii. DHHL also worked to assist homeowners to make mortgage payments. These two programs were put into place prior to the specific funds appropriated for this purpose by Congress under the ERA and HAF programs. DHHL also stood up an ERA Program once those funds were appropriated and made available.

IV. Panel Discussions (Day 2)

A. Sheltering the Unsheltered: Homeless Shelters and Housing in Tribal Communities.

The moderator was *Erla Sagg, Training and Technical Assistance Director at NAIHC*. The panelists were *Elizabeth Elliott, Executive Director of the Northern Circle Indian Housing Authority, Mike Goze, CEO, American Indian Community Development Corporation, and Jerri Killer, Executive Director, Cherokee Nation Housing Authority*. The panelists first talked about the importance of partnering with federal and state agencies, other tribal agencies, local non-profits and other local organizations to address the homelessness crisis. One agency or entity cannot tackle this problem on its own. It is too complicated and too far reaching. They also noted that providing housing is only part of addressing the need, there are trauma issues that require support and counseling. The programs that these entities run provide not just standard homeless support (temporary housing, rental assistance, etc.), but a broader array of services, including mental health counseling. The panelists also noted that in Indian Country, homelessness is often expressed in overcrowding. Thus there needs to be a focus on construction of new housing for homeownership as well as rentals.

The panel also addressed Native Veteran homelessness programs, because there is a specific and pressing need in this area. The programs are trying to figure out ways to serve veterans in a way that is appropriate and specific to this population. They have specific needs and modes of communicating and interacting with governmental agencies. Many Native Veterans identify more strongly with their Native community rather than as veterans, and thus referrals and services need to take this into account. It is important to bring in Native Veterans to

work with this community, so that they can be served more effectively.

To develop housing quickly to address the need, it is worth looking at acquiring and remodeling existing housing rather than new construction. Acquisition and remodel will often take less time.

B. Keeping Communities Safe: Examining Housing Policies on Substance Abuse

This panel was moderated by *Sylvia Wirba, an attorney with Wagenlander & Heisterkamp, LLC*. The panelists were *Colleen Tenas, Housing Resources Manager, Salish & Kootenai Housing Authority, and Ryan Simafranca, Deputy Solicitor General of Housing, Office of Solicitor General, Milles Lacs Band of Ojibwe*. The panelists were invited to share how their programs are combatting methamphetamines and other drugs in their communities. The panelists first discussed the policies their programs use for drug use in their housing units. The panelists shared that some tribes structure their policies to require that anyone who has been convicted of drug-related criminal activity in last five years must show that they completed a rehabilitation program or that rehabilitation was not required. The applicants must further submit a report by their probation officer showing that they are complying with their parole terms. If a tenant has been convicted in the last year, they are automatically not eligible to apply. The panelists commented that if there are any drug violations by current tenants, they are immediately issued an eviction notice. The panelists commented that some of their housing programs that specifically help those struggling with substance abuse require tenant drug testing. Another panelist commented that while they do not require drug testing, they do conduct a criminal background report. Further, they do require testing for their homeless shelter and they conduct room to room drug inspections, which has significantly helped reduce drug use.

One panelist remarked that their Tribe has adopted a policy of zero-tolerance for drug use that applies to all housing units. The tribe sometimes grants a one-time exception for drug possession, use, or distribution if the tenant meets with a drug treatment counselor and complies with the recommendations for drug treatment. Once the tenant has used up the one-time exception, the Tribe enforces the zero-tolerance stance and moves to evict the tenant for any drug-related activity. However, the program does work with the tenants by allowing them to be added back to the housing waiting list if the tenant immediately turns the unit back to the housing department after being evicted. If the tenant does not immediately turn possession of the unit to the housing department, then the tenant must wait two years to be placed back on the waitlist. However, the panelist remarked that in most of the cases in which the program grants an exception to their zero tolerance, the tenants reverts back to drug use within six months or less. The panelists noted that a halfway house in the community helps support those who have been evicted from drug use.

The panelists moved on to discuss how their programs have addressed the increase of synthetic drugs in tribal communities. One panelist remarked that his Tribe adopted the federal definition of drugs in the Controlled Substance Act, which means that the Tribe treats synthetic drugs with the same zero-tolerance policy as non-synthetic drugs. However, they are stricter

with drug manufacturing because drug manufacturing in a home causes the housing program to need to rehabilitate the home. For this reason, if a tenant manufactures drugs, they are banned from the housing program for life. Another panelist commented that because of the high costs and efforts of rehabilitating drug-contaminated homes, the housing program only completes rehabilitation on units if the drug contamination is identified by police. Marijuana in that community is treated the same as all other substances, as it is still illegal under tribal law. Another panelist commented that the state medical marijuana program is very strict and does not allow for any recreational marijuana use. For housing units funded through NAHASDA, the housing program enforces a zero-tolerance policy, with no exception for marijuana. For housing units not funded through NAHASDA, the Tribe adopted the state's drug law, which allows for marijuana in certain circumstances. As a result, the housing program will need to reexamine and potentially revise its housing policy to align the zero-tolerance stance with the state's marijuana laws.

The panelists remarked that the housing authority partnered with the state drug court, will be creating a tribal drug court, and has partnered tribal entities that provide sobriety services. If tenants are working with the sobriety program and meeting the program's goals, then they can transition back into tribal housing. One of the panelists commented that his Tribe is developing a wellness court and passing a health and wellness statute to help individuals with substance abuse. The Tribe further utilizes the tribal police in dealing with substance abuse and often becomes aware of drug use because of tribal police reports.

Finally, the panelists discussed future efforts that could help address substance abuse in tribal communities. One panelist commented that a possible option is to connect substance abuse or lack thereof with tribal per capita payments, noting that when financially incentivizing people to not participate in drug use may make a difference. The panelists noted that drug use is not a problem that housing can solve on its own. Homeless shelters and other supportive programs are needed to work in tandem with the Housing program.

C. The Future of Tribal Housing: Looking at the Next 25 Years of NAHASDA

This panel was moderated by **Brian Mann, NAIHC Training and Technical Assistance Coordinator**. The panelists were **Gabe Layman, Executive Vice President/Chief Operating Office, Cook Inlet Housing Authority**, **Niniau Kawaihae, Special Assistant, Department of Hawaiian Homelands**, and **Joseph Kunkel, Director, MASS Design Groups' Sustainable Native Communities Design Lab**. The NAHASDA statute was enacted 25 years ago. The panelists gave their thoughts on what they see as the next 25 years of Tribal housing. The panelists first discussed how their programs have benefited from NAHASDA, noting the flexibility and innovation that NAHASDA is vital and allows tribes to prioritize strategies and programs that best serve their people. The NAHASDA resources allowed the tribe to create permanent supportive housing programs through partnerships that the tribes decided best fit their communities. The NAHASDA formula also provides stability by allowing tribes to know how much funding they will receive each year.

The panelists commented that HUD's focus on low income (80 percent area median income) has particularly helped those individuals and families find housing. The tribe's ability to provide culturally relevant housing and financing has been very successful in persuading tribal members to adapt to western financing structures and empowering tribal members to participate in both the tribal world and western world. The panelists remarked that giving tribes the ability to decide on the planning, designing, and building of housing has allowed tribes to create culturally appropriate housing.

The panelists then commented on the strategies necessary to sustain NAHASDA for the next 25 years, noting that NAHASDA is a useful tool but that tribes must also utilize other housing programs, such as the low-income housing tax credit program. The panelist noted that leveraging other funding sources is critical to improving tribal housing. Tribes must also continue to defend self-determination, specifically in the Indian housing world. Tribes must also advocate for reducing costs and administrative burdens, including advocating for more staffing resources for HUD in its partnership with tribes, and advocating that NAHASDA funding increase to keep pace with inflation.

The panelists finished by discussing the importance of increasing access to broadband and integrating that into housing. The panelists commented on the difficulties that the lack of broadband access has on tribal communities, particularly regarding access to online education and work. They noted that the pandemic showed communities how critical broadband is to education, business, and keeping families connected and that access to broadband is now a matter of equity and tribal self-sufficiency. Broadband infrastructure must also be adapted to fit each community, which means that tribes should not all be held to the same standards.

Conclusion

If you have any questions regarding this memorandum, please contact Ed Clay Goodman at egoodman@hobbsstrauss.com or by phone at (503) 242-1745.