



Housing Counseling Tribal Consultation Written Feedback

Comments Received January 26 - February 19, 2021

Tribal Entity and/or Organization	Feedback Submitted
<p>Ho-Chunk Nation (TDHE: Ho-Chunk Housing and Community Development Agency)</p> <p><i>Date received: January 26, 2021</i></p>	<p>Historically, funds allocated towards Indian Housing programs has not risen in many, many, many years to meet our needs.</p> <p>I agree that this housing counseling is needed in Indian Country.</p> <p>Are you going to seek or advocate, better yet obtain additional funding to create and establish capacity so that this requirement can be successful?</p> <p>Issues: geographically our villages are spread out through 7 counties in Wisconsin; this takes away from regular work load, purchase of materials, broadband costs to conduct to remote locations costs, additional staff, transportation, mileage costs.</p> <p>In the Coronavirus Relief Fund (CRF) \$150 billion, I was looking at the “View CRF allocations” (search by state, county, and/or city/metro) and for Wisconsin state that our TDHE non-profit resides in are: Dane County, Milwaukee county, Milwaukee city, for a total allocation payment \$1,997,294,785.80.</p> <p>The Federal Register tribal governments as an eligible recipient, can you share more information on where and when was notification given to tribes to apply for this funding?</p> <p>Can you please explain more on how our TDHE non-profit can apply for CRF funding to assist with the required housing counseling certification?</p> <p>I am trying to understand all the funding sources and how we can access them.</p>
<p>Citizen Potawatomi Nation (CPN)</p> <p><i>Date received: February 2, 2021</i></p>	<p>To Whom It Concerns:</p> <p>The Citizen Potawatomi Nation’s (CPN) response to your tribal consultation seeking input for the HUD’s Housing Counseling Certification Requirement is attached for your consideration.</p> <p>If you have any questions about the Nation’s position, please don’t hesitate to contact Mr. M. Scott George, CPN’s Housing Director, by email (copied) or by phone at 405-273-2833.</p> <p>Sincerely, Kasie [See 3 page letter from CPN for reference]</p>
<p>Consultant to NAIHC</p> <p><i>Date received: February 2, 2021</i></p>	<p>Can you please send me the names and emails of those on the panel (it would be nice to have the participants so we can reach out to each other) Include name and Tribal affiliation. Thank you, Cielo Gibson, NAIHC Consultant.</p> <p>By the way, the session was excellent, but I do think you should have several listening sessions where tribes/TDHEs can make 10 minute presentations about their housing counseling efforts, obstacles, proposed, solutions, success stories, etc. I also think you</p>

	should review the Pathways Participant and Instructors' Workbooks and Building Native Communities to see what we teach.
Ho-Chunk Nation (TDHE: Ho-Chunk Housing and Community Development Agency) <i>Date received: February 4, 2021</i>	We are a TDHE and a nonprofit. Once we become a housing counseling certification agency, we have the right to find "Pathways" as a housing counseling certification program correct? Pathways, the Native homeownership training. If we put this in our work plan that we are utilizing a housing counseling certification training that is culturally significant. Is this acceptable?
Native Community Capital <i>Date received: February 4, 2021</i>	See attached letter. Thanks, dc [See 3 page letter from Native Community Capital for reference]
Native Community Capital <i>Date received: February 4, 2021</i>	Once the new rule is implemented and if an IHBG or ICDBG funded tribal homeownership housing is put in operation and the tribe / TDHE is not compliant with this rule, what is the effect on that TDHE?
Choctaw Nation of Oklahoma <i>Date received: February 4, 2021</i>	Please let me know if you have any questions. Yakoke (Thank You), [See 2 page letter from Choctaw Nation of Oklahoma for reference]
Choctaw Nation of Oklahoma <i>Date received: February 4, 2021</i>	I have attached my prepared statement concerning the Tribal Consultation. Please let me know if you have any questions. Yakoke (Thank You), [See 4 page letter from Choctaw Nation of Oklahoma for reference]



Choctaw Nation of Oklahoma

Housing Authority

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Gary Batton
Chief

Jack Austin, Jr.
Assistant Chief

February 4, 2021
Office of Housing Counseling
Tribal Consultation

I am writing you concerning the HUD's Final rule for Housing Counseling Certification. I have added statements from HUD and added my questions in bold lettering.

NAHASDA: This act was designed specifically to assist in the development of housing, housing services, housing management services, and crime prevention and safety activities in Indian communities. These actions are meant to align with the objectives of assisting and promoting affordable housing on tribal land, offering tribal members better access to private mortgage markets, matching development to surrounding areas, and promoting private capital markets Indian Country.

The act recognized that the policies HUD applied to providing public housing in poor urban neighborhoods might not be effective on rural Native American reservations

Shouldn't tribal specific program counseling align with this statement and provide our Tribal Members with the resources, tools and program requirements that our Tribe has to offer? I feel that the certification could be more tailored for tribal programs.

HUD'S FINAL RULE FOR HOUSING COUNSELING CERTIFICATION

Updated as of August 12, 2020 Key Definitions:

Housing Counseling is independent, expert advice customized to the need of the consumer to address the consumer's housing barriers and to help achieve their housing goals and must include the following processes: intake; financial and housing affordability analysis; an action plan, except for reverse mortgage counseling; and a reasonable effort to have follow-up communication with the client when possible.

*Services that provide housing information, or placement or referral services, (for example, mobility-related services for the Housing Choice Voucher (HCV) program), **do not constitute housing counseling** and would not necessitate an individual providing these services to become a HUD-certified housing counselor working for an agency approved to participate in HUD's Housing Counseling program under this rule. Routine administrative activities (e.g., program eligibility determinations, intake, case management, property management, and the collection of rent or loans) are also **not housing counseling**. Holistic case management for persons with special needs, for persons undergoing relocation in the course of a HUD program (including relocation and other advisory services provided pursuant to the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and other Federal laws), or for social services programs that also provide housing services as incidental to a larger case management program are **not housing counseling**. Additionally, fair housing advice and advocacy offered in isolation from housing counseling (i.e. without providing for an intake; financial and housing affordability analysis; an action plan to address other housing needs or goals; and follow up) **does not constitute housing counseling**.*

Choctaw Nation Housing Authority has several departments working under one umbrella, we have a Rental/Lease Property manager that has a Choctaw Elder, who may be paying late payments for several months and now behind. Because they receive their SSI payment once a month and has never been able to get caught up due to a one-time emergency that they had not planned on. The Property manager reaches out to the counselors that are located in that rural community requesting that a counselor to help with budgeting along with referring other tribal programs to assist with their hardship to allow them to become current and pay their rent on time. Is this considered counseling? If we do not become certified, would a local certified counselor in rural Oklahoma be equipped or knowledgeable to counsel on the 520 lease participants and the requirements that this program requires for each tribal household?

Updated as of August 12, 2020

Applicable Programs:

The following list of programs provide housing counseling as described in the four categories in § 5.111. Therefore, after August 1, 2021, housing counseling provided in connection with any program identified below must be provided by HUD-certified housing counselors that work for an agency approved to participate in HUD's Housing Counseling program: This list includes the ICDBG.

Please note that application of the Housing Counseling Certification Rule requirements to the Native American housing programs will undergo tribal consultation before applying.

The Federal Register dated May 31, 2017 Section II. Tribes as HUD noted in the final rule, application of the Section 106 certification examination requirements will only apply to Indian tribes and tribal entities after HUD undergoes tribal consultation and addresses the participation of tribes in HUD's Housing Counseling Program in future rulemaking or guidance, as appropriate. ***Does this mean, Tribes are going to be allowed an additional 4 years to be compliant due to the consultation just taking place on February 4, 2021?***

Yakoke (Thank You),

Carrie Blackmon

Director/Service Coordination

Choctaw Nation Housing Authority

cblackmon@choctawhousing.com

580-317-7303





February 4, 2021

David L. Berenbaum
Deputy Assistant Secretary
Office of Housing Counseling

Delivered via Email to: tribalconsult@hudexchange.info

RE: Tribal Consultation for Housing Counselor Certification Requirements

Dear Mr. Berenbaum,

Native Community Capital is a Native CDFI located on and serving the Pueblo of Laguna (POL). Our work is to make home loans to enrolled members of the Pueblo of Laguna and other tribal communities across the Southwest. Since 2015, NCC has managed the POL Home Loan Program (POLHLP).

We have funded construction of 19 new homes in 5 villages and manage a portfolio of over \$2.5MM and in our history as a CDFI we have deployed over \$18MM total for tribal housing, community facilities as well as for small business and debt consolidation loans.

NCC has been providing financial literacy and homebuyer education as have the tribes who we partner with on housing development and financing initiatives. The services provided are culturally relevant and typically specific to the local tribal government and traditional practices of a specific Pueblo community – not all tribes are the same and they must not be treated as such this the Biden-Harris administration’s emphasis on recognizing the requirements of the RESPECT Act including requiring substantive engagement with tribes. To that point, I urge your consideration of the following responses to questions posed relative to the Housing Counselor Certification Requirements:

1. Whether the housing counseling certification requirements included in the final rule would be practical and effective in your community;

Like so much public policy that affects tribes, this policy and the requirements were developed with non-Indian populations in mind. Therefore, I do not believe the requirements would be practical or effective in our local community or the other tribal communities we serve. Each of the following issues would make achieving certification extremely difficult and/or put existing certification at risk – and as such a major disincentive for tribes even to attempt certification:

- a) Turnover: Homeownership as an option for most tribal members residing on tribal lands is still extremely limited. As a result, a certified counselor or agency may only use their designation rarely if at all before certified staff leave or the agency loses its certification.

- b) Limited Dealflow: Serving 30 clients in a 12-month period may only be achievable for 10 of 573 tribes. Even the ten largest tribes may find difficulty depending on access to land, limited or untested local ordinances, as well as distressed credit / income profiles of the population served.
- c) Limited Infrastructure: Housing counseling facilities would need to be purpose built More than likely, given the limited client base, existing facilities would need to be re-purposed in violation of the requirements and as such this is impractical.

2. What impact the housing counseling certification requirements would have on providing culturally relevant housing counseling and other programming in Indian Country and your community;

The requirements could result in a demand for more information that is important but may be irrelevant such as the requirement to disclose fair housing laws which are unenforceable on tribal land. Also, it may likely undermine or undervalue the issues relevant in tribal communities such as Good Standing requirements imposed by local village officials relative to securing a land assignment. Similarly, the process, often untested, of having a tribe exercise its right of first refusal begs questions that may not have a convenient answer. For these reasons, ONAP, as the HUD in-house subject matter expert, should oversee certification approval to advance and protect culturally relevant housing counseling programming. Moreover, housing counseling standards already approved and in use by NAIHC should be allowable for meeting the requirement.

3. What changes to the housing counseling certification requirements included in 24 C.F.R. part 214 would you recommend to ensure that these certification requirements (a) are not administratively burdensome, (b) enable appropriate access to housing counseling services in your community – particularly in very remote areas – and (c) help tribal members address their housing issues;

Allow for an intermediary agency to contract with and utilize tribal para-professional (uncertified) counselors. Much like rural tribal dental clinics or rural wastewater plant operators – the doctor or licensed water operator provide services on a “circuit-rider” basis. This does not mean that all services stop when they are not available. It simply means that a licensed individual provides consultation, quality control, and in-person oversight on a limited but practical basis to ensure the safety and soundness of operations.



4. Any other ideas on how HUD can ensure that the counselor certification requirements applicable to HUD's Native American programs are effective in Indian Country;

Just as the new Indian Country Economic Enhancement Act of 2020 provides funding for the establishment of Native American Small Business Incubators, so too should new funding be made available to establish regional intermediary organizations to provide housing counseling services to tribes across a certain region to establish and improve the regular and consistent availability of financial literacy and homebuyer education and counseling services via a "circuit-rider" type approach.

5. Do you anticipate challenges if the qualification process that HUD currently uses for approving units of State or local government included in 24 C.F.R. part 214 were applied to tribes or Tribally Designated Housing Entities (TDHEs)?

Yes, challenges will likely be made particularly if and when IHBG or ICDBG program requiring homebuyer counseling under the new requirements are found deficient and create a grants management or grants evaluation finding for the TDHE. Ultimately, HUD should view working with tribes or TDHEs as working directly with state governments – not working with units of state governments.

Thank you for the opportunity to comment and if I can be of any further assistance please feel free to call on me at any time at 855.628.2272.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Castillo". The signature is stylized and cursive.

Dave Castillo , CEO



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CITIZEN POTAWATOMI NATION

02/01/2021

David L. Berenbaum
Deputy Assistant Secretary
Office of Housing Counseling

RE: Tribal Consultation for Housing Counselor Certification Requirements

Dear Sir,

This letter is in response to the December 18, 2020 Dear Tribal Leader Letter regarding Section 106 of the Housing and Urban Development Act of 1968 as amended by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The Citizen Potawatomi Nation (CPN, Tribe or Nation) offers the following information and input for consideration.

Background

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 required that any homeownership counseling or rental housing counseling required under, or provided in connection with, any HUD program must be provided only by organizations or counselors certified by the U.S. Department of Housing and Urban Development (HUD) as competent to provide such counseling. On December 14, 2016, HUD published a final rule in the Federal Register entitled "Housing Counseling: New Certification Requirements". The original compliance date for counselor certification was August 1, 2020. However, last July HUD published an interim final rule on its website to announce a new compliance date of August 1, 2021. It is troubling to the CPN that while the final rule for the housing counseling certification requirements was published over four years ago, HUD is just now undergoing tribal consultation. CPN asks that in the future, HUD provides robust tribal outreach so that tribal-specific consultation take place as the negotiated rule making process occurs and well before a final rule is published.

Consultation Recommendations

First, during the webinar on January 26th, it was mentioned that the majority of Native American Housing Programs have trained staff to address Homeownership and Rental Counseling, many having attended Native American Indian Housing Council's (NAIHC) Pathways Home Training. Receiving quarterly reports from HUD's Office of Native American Programs Native American during the foreclosure crisis, homeowners using the Section 184 Home Loan

Guarantee were not significant contributors to the foreclosure crisis that partially led to this reform. CPN believes this is largely in part to the Pathways Home training. This signifies that we, the 574 Native American tribe's housing efforts and counselling capabilities were not recognized or considered. Having reviewed portions the Dodd Frank Act, it's not hard to miss the numerous reforms and attempts to abolish the Act altogether. It is obvious that tribes need to insist on congressional reform or exemption from this counseling requirement. Until that can be accomplished, we have attempted to address the five points of consultation in the following way.

1. Are the housing counseling certification requirements included in the final rule would be practical and effective in your community?

The CPN is a large tribe serving Native Americans in central Oklahoma. The certification requirements are impractical based on the feedback we have received due to the limited number of HUD certified counseling agencies in the state of Oklahoma and the distance required for attendance by the Homebuyer/Renter. With respect to rental counseling, CPN has initiated numerous payback agreements inhouse and after hours. This certification requirement would exacerbate the hardship on the rental tenant if they had to take off work and travel to one of these agencies. Tribes should be recognized for counseling efforts and training and should be grandfathered in as "certified".

2. What impact the housing counseling certification requirements would have on providing culturally relevant housing counseling and other programming in Indian Country and your community?

The impact is an erosion of our tribal sovereignty. The Native American Housing and Self-Determination Act of 1996 (NAHASDA) allows us to create housing programs specific to our tribal needs and a report or interaction with yet another government agency to accomplish what is already performed on a daily basis would impact daily efforts to provide housing services. If this is a reporting requirement for a service already provided, the number of counseling sessions performed on the Annual Performance Report and in turn, the ONAP can provide your agency the information. The potential homebuyer would also be impacted by seeking counseling from an agency who may not be aware of the cultural differences and tribally individualized homeownership programs. The Tribe serves 50 to 100 potential homebuyers annually with its down payment and closing cost program to tribal members across the United States. This requirement would severely impact this achievement.

3. What changes to the housing counseling certification requirements included in 24 C.F.R. part 214 would you recommend to ensure that these certification requirements (a) are not administratively burdensome, (b) enable appropriate access to housing counseling services in your community – particularly in very remote areas – and (c) help tribal members address their housing issues?

(a) The Nation suggests removing the 501 (c) 3 requirement and/or grandfather the tribal programs into your counseling agency, accepting the criteria of the Pathways Home training and filling in any shortfalls with your certification training.

(b) Because CPN is centrally located and largely serves the tribal members within our designated jurisdiction, we already provide easy access to our tribal community.

(c) CPN's services are already known to the tribal members in our community and the Nation understands their housing and supporting needs. Having professional relationships with the tenants, the Nation is aware of their housing issues and assist them often with solving these issues. Requiring tenants to take off work, juggle or find transportation for a 72-mile roundtrip to the nearest counseling agency places an undue burden on our already low-income population. Finally, some tenants may have cellular plans but because their data usage is oftentimes very limited, tele-counseling sessions are not a reliable alternative.

4. Any other ideas on how HUD can ensure that the counselor certification requirements applicable to HUD's Native American programs are effective in Indian Country?

As mentioned previously, this requirement should grandfather existing tribal programs; otherwise, tribes should be exempt, since tribes already have their own counseling programs. If CPN is to comply tribes must also be exempt from the 501(c)3 requirement or close the tax loophole mentioned during the webinar. Finally, the counseling quota requirement should be changed to a percentage of tribal members served per year.

5. Do you anticipate challenges if the qualification process that HUD currently uses for approving units of State or local government included in 24 C.F.R. part 214 were applied to tribes or Tribally Designated Housing Entities (TDHEs)?

Challenges that 24CFR Part 214.103 presents are as follows:

- The non-profit status is the first challenge, as some tribes, such as CPN, operate their programs as housing department within the tribe; we are tax exempt as a federally recognized tribe but not a 501(c)3. This requirement would therefore need to be revised.
- Experience. Although tribes have trained counseling staff, they would not be recognized as an "intermediary"; therefore, tribes would not meet the second requirement.

Thank you for your consideration of our recommendations. However, it is unfortunate that time after time a law is enacted and tribal nations are an afterthought. It is common that our recommendations through tribal consultation are provided as a footnote and we are then compelled to comply with the law or regulation as written when it does not respect tribal sovereignty. CPN asks that you heavily weigh and reflect the comments of the Native American Nations from which you are seeking input. If you have any questions about our comments, please contact Mr. M. Scott George, CPN Housing Department Director, by email at sgeorge@potawatomi.org or my phone at 405-273-2833.

Sincerely,


Linda Capps
Vice Chairman



Choctaw Nation of Oklahoma

Housing Authority

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Gary Batton
Chief

Jack Austin, Jr.
Assistant Chief

Date: 2/4/2021

Halito, I am Tracy Toyebo with the Choctaw Nation Housing Authority of Oklahoma. Thank you for allowing me this time to express the concerns of the current requirements of passing the HUD exam and how this will affect our Tribal Members and Counseling agency.

Prior to enactment of the Native American Housing Assistance and Self-Determination Act of 1996, Tribal housing programs were administered by Indian housing authorities (IHA) under the 1937 Housing Act. While Tribal communities benefitted from the existing Federal and Tribal housing programs in existence at that time, there were many mandates and requirements that created barriers for IHAs who operated in a very different environment than the public housing. With the adoption of NAHASDA, Tribes and Tribally Designated Housing Entities (TDHEs) were finally able to exercise some form of self-determination with respect to their housing programs and utilized this to develop programs and services that were tailored directly to meet the needs of their respective communities. Through experience, Tribal housing professionals had learned that while they may be beneficial to mainstream America, many existing homeownership techniques did not work effectively in Indian Country. These techniques would include not only lending products or financial resources but also training and counseling curriculums. Achieving homeownership in Indian Country was not an easy task and the environment contained many barriers and obstacles along the way which caused many individual Tribal members to become discouraged and even discontinue their own pursuit of home ownership. The Tribes and TDHEs were able to lessen some of these issues and obstacles by developing a more customized approach to home ownership for Tribal members. Pathways Homes and the continuing development of the HUD Section 184 loan program are two prime examples of how Tribes and TDHEs have been able to assist their customers in navigating their way through the barriers that had made home ownership an impossible dream for many Native American families in the past. The mandate that HUD Counseling Certification requirements should become accepted to Tribes and TDHEs in carrying out their affordable housing activities under NAHASDA is simply a throwback to the days of the old 1937 Housing Act when IHAs were forced to operate a program that was designed for others and did not meet the unique needs of their specific communities.

We are currently a HUD approved counseling agency. We started providing counseling services in June of 1996 which is 24 years and 7 months ago. We joined HUD in April of 2004 which is 16 years and 10 months ago. Counseling has changed in many ways over the last 24 years within the Choctaw Nation. We have always taken it serious on tailoring our counseling to the needs of our Tribal members.

When we submitted our 9902 report to HUD for the Fiscal year 2020, we had served 612 Tribal Members through counseling. 95% of our counseling clients are Tribal Members that are currently living in one of our housing units. As an example, our LEAP Program is a new homeownership program opportunity for Choctaw Tribal members who meet the program income guidelines. The goal of this program is to assist families with credit issues to become mortgage ready and lender qualified over time with credit counseling services. The LEAP program has 520 LEAP homes and looking to build 420 more over the next three years on our reservation. The Tribal members will sign a 15-year lease with intent to obtain mortgage during the 16th year for the remaining balance of the home. During the 15 years the Tribal Member will meet with our counselors to obtain Education and homebuyer counseling services throughout the duration of the lease. If they are not meeting the counseling requirements the eviction process will begin with the Tribal Member.

We currently have six counselors that serve our Tribal Members on the Reservation area. The reservation area covers 10 ½ counties. Our reservation is located on almost 7 million acres. To travel from the North side of the reservation to the South side will take you around three to four hours one way.

Our Counselors receive a variety of referrals from the various departments in Housing and within the Tribe concerning budget and credit concerns. Back to our example with the LEAP : When our counselors meet with our Tribal Members they are completing a monthly budget looking at their current expenses and looking at options of where they can cut back on expenses and to put money aside for when that hot water tank goes out , creating a workplan with the client to set short term and long term attainable goals, going over the clients credit report teaching them what a credit report means and the importance. Our counselors are building relationships with the Tribal Member and preparing them to hopefully one day be a homeowner within the 15 years.

Our counselors are not only reviewing budgets and credit reports, but they are continually looking for resources that are available for our Tribal Members we offer a wraparound service. The Choctaw Nation offers over 150 services through the health care, education, housing, cultural services, and our member services. We feel like it's very important that our

counselors are knowledgeable and have a working relationship with all the other departments to connect them to other resources available.

I feel in order to be a good counselor it takes more than passing an exam. Not everyone can be a good test taker and pass the exam. In order to be a good counselor, you must also have attributes such as:

- Communication Skills-, Counselors need to have a natural ability to listen and be able to clearly explain their ideas and thoughts to others.
- Acceptance- Counselors need the ability to relate to clients with an open, nonjudgmental attitude – accepting the Tribal Member for who they are and where they are in the budgeting or homebuying process.
- Empathy and Compassion- Counselors help people through some of the most difficult and stressful times of their lives. Compassion and empathy help our Tribal Members feel understood and heard.
- Problem-Solving Skills- It's not up to our counselor to solve their problems. Counselors must have excellent problem-solving skills to be able to help their clients identify negative spending habits and help guide to making positive changes.
- Dedication-Counselor needs to be dedicated to the Tribal Member welfare and devoted to developing a meaningful relationship as their top priorities. We had a Tribal Member that it took us over two years to complete a budget sheet with our counselor. This took true dedication on the counselor part.
- The most important Building Relationships with our Tribal Members. We must build that trust. We are asking to see a lot of personal information pertaining to their spending habits. With our department being associated with the Choctaw Nation that gives a head start on building a relationship with our Tribal Members.

We currently have six counselors and we have utilized Pathways and Neighborworks for our training. Each of these training organizations offer the specific trainings that are tailored to the specific areas of our counseling. After each training the counselors are required to take an exam. I am concerned with the HUD exam if less than half of our staff can't pass the HUD exam what are we to do? At that point if we only have one that can pass it do, we just fire our current 5 counselors because maybe they don't understand reverse mortgages? This will cause our department to have a high turnover rate and who is to say that the new counselors that are hired can even pass the exam. Can we go back to the drawing board and let's look at tailoring the exam to the area we are counseling. It seems that we are taking steps backwards into the cookie cutter approach.

The current curriculum of the HUD certification contains much information that is not relevant to Tribal and TDHE staff in working with our Tribal Members. In addition, the proposed

changes would introduce an additional impediment and place more of a burden on the Native American families who are trying to pursue their dream of obtaining homeownership. One thing that Tribes and TDHEs have learned through the years is NAHASDA has greatly assisted them in overcoming the issue that one size does not fit all in Indian Country.

In closing I want to share the mission statement that our Tribe takes seriously: **Mission Statement:** To the Choctaw proud, ours is the sovereign Nation offering opportunities for growth and prosperity

Yakoke

(Thank You)

Tracy Toyebo

