



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

OFFICE OF PUBLIC AND INDIAN HOUSING

April 5, 2018

SUBJECT: SECTION 184 INDIAN HOUSING LOAN GUARANTEE PROGRAM

Dear Tribal Leader:

As you may know, the U.S. Department of Housing and Urban Development (HUD) is conducting Tribal Consultation on the development of new regulations for the Section 184 Indian Home Loan Guarantee (Section 184) program. In doing so, HUD is committed to providing continuous outreach and engagement throughout this Government-to-Government Consultation. This letter provides additional information on the process, and lists the remaining Consultation Sessions to be held throughout the country.

Background

HUD's Section 184 program has been active for more than 20 years. In that time, it has assisted more than 40,000 Native American families by guaranteeing over \$6.7 billion for home mortgages in Indian Country. The program grew quickly, and to modernize and accommodate its expansion, the Section 184 program now needs more structure and safeguards. Borrowers, lenders, HUD, and Tribal Leaders all need a clear and navigable process to use this important program and support increased homeownership for Native Americans.

HUD is analyzing the program's current regulations and processes, and will draft new regulations, a "proposed rule," later this year. Honoring HUD's Tribal Consultation process and Tribes' requests to be involved early in the regulatory process, HUD is now reaching out to Tribes, asking for comments and input in the initial drafting stage of the regulations. Specifically, HUD is asking to hear from Tribes about what the Section 184 program does well and what needs improvement.

A "read-ahead" document is enclosed, and is available at www.hud.gov/codetalk. This document highlights issues that HUD is considering addressing in the new regulations, and will guide discussions at future meetings. Tribal Leaders are urged to attend the upcoming Consultation Sessions prepared to address these issues, and any other issues a Tribe may have identified when working with the Section 184 program.

Process

HUD is engaging with Tribes at the early stages of drafting regulations and throughout the regulatory process. HUD began this series of Tribal Consultation Sessions at the National Congress of American Indians (NCAI) 2018 Executive Council Winter Session, held in February, and the National American Indian Housing Council (NAIHC) 2018 Legislative Conference, held in March. These meetings were widely attended by both Tribal Leaders and housing practitioners, who provided valuable insight and recommendations for changes to the Section 184 program. Throughout this month, HUD will hold Consultation Sessions in each ONAP region to provide Tribal Leaders and their designees the opportunity to comment on the program in person.

In June, HUD plans to produce an initial draft regulation based on HUD's research and Tribal comments collected during the initial comment period. HUD will send this draft to all Tribal Leaders and housing executives for a 60-day comment period. During this comment period, HUD plans to hold regional calls with Tribal Leaders and their designees. These calls will be an opportunity to ask questions about the

draft and verbally submit comments. ONAP will develop a revised draft based on comments received during this time period, which will be submitted for review by other HUD offices and the U.S. Office of Management and Budget (OMB). This 60-day period for Tribes to examine the draft rule and collaborate with HUD will be prior to, and in addition to, the standard public comment periods associated with publication in the *Federal Register*.

Throughout the initial comment period (February – August 2018), Tribal Leaders and their designees may submit written comments to HUD at 184consultation@hud.gov. HUD will post updates and comment summaries on its Codetalk webpage: www.hud.gov/codetalk.

Consultation Sessions

Upcoming Consultation Sessions are scheduled as follows:

- United Native American Housing Association (UNAHA) Annual Meeting at Holiday Inn Lakewood in Lakewood, CO, April 9, 2018
- Association of Alaska Housing Authorities (AAHA) meeting and webinar at AAHA offices in Anchorage, AK, April 9, 2018
- Northwest Indian Housing Association (NWIHA) Quarterly Meeting at Coeur d'Alene Resort Casino in Worley, ID, April 17, 2018
- Southern Plains Indian Housing Association (SPIHA) Spring Meeting at the Hard Rock Hotel in Catoosa, OK, April 19, 2018
- Tribal Self-Governance Annual Consultation Conference at the Albuquerque Convention Center in Albuquerque, NM, April 22-26, 2018
- HUD Eastern Woodlands ONAP Office, meeting and webinar, Chicago, IL, May 3, 2018.

For specific details and logistics for each session, please refer to the Codetalk website, www.hud.gov/codetalk. At each session, HUD officials will provide a brief overview of the Section 184 program, and then accept comments from Tribal Leaders or their designees, as well as other attendees.

If you cannot attend one of the upcoming sessions, you are encouraged to submit comments on developing Section 184 regulations to 184consultation@hud.gov.

Input from Tribal Leaders is essential to the development of HUD's programs. Thank you for your continued partnership and collaboration.

Sincerely,



Heidi J. Frechette
Deputy Assistant Secretary
for Native American Programs