FISCAL YEAR 2024

REPORT TO CONGRESS ON NATIVE AMERICAN HOUSING ASSISTANCE AND SELF-DETERMINATION ACT (NAHASDA)



April 2025

U.S. Department of Housing and Urban Development Office of Public and Indian Housing Office of Native American Programs



Native American Housing Assistance and Self-Determination Act Report to Congress FY 2024

Contents

Introduction	1
Message from the General Deputy Assistant Secretary	2
Background	3
Funding Summary	3
Analysis	4
Indian Housing Block Grant	5
Indian Housing Block Grant Competitive	.11
Title VI Loan Guarantee Program	.12
Training and Technical Assistance	.13
NAHASDA in Action	.15
Conclusion	.21

1

I. Introduction

The Native American Housing Assistance and Self-Determination Act of 1996¹ (NAHASDA) Annual Report for Fiscal Year (FY) 2024 provides an overview to Congress on the U.S. Department of Housing and Urban Development's (HUD's) Native American Housing programs authorized under NAHASDA. The information provided in this report fulfills the requirement in Section 407 of NAHASDA (25 U.S.C. 4167). Section 407 requires:

(a) In general

Not later than 90 days after the conclusion of each fiscal year in which assistance under this chapter is made available, the Secretary shall submit to the Congress a report that contains—

(1) a description of the progress made in accomplishing the objectives of this chapter;

(2) a summary of the use of funds available under this chapter during the preceding fiscal year; and

(3) a description of the aggregate outstanding loan guarantees under subchapter VI.

This report reflects HUD's continuing commitment to inform the American people, Tribes, its partners, and its employees about the mission, goals, and work it seeks to accomplish. HUD works every day to strengthen the housing market to bolster the economy and protect consumers; expand homeownership; meet the need for quality affordable rental homes; utilize housing as a platform for improving quality of life; promote self-sufficiency; serve as a responsible steward of taxpayer dollars; and uphold HUD's federal trust and treaty responsibilities.

¹ Pub. L. No. 104-330 (codified as amended at 25 U.S.C. 4101 et seq.)

Message from Heidi J. Frechette, General Deputy Assistant Secretary

I am pleased to issue the NAHASDA Annual Report to Congress for FY 2024. This report reflects our progress toward addressing housing issues through the programs authorized under NAHASDA, including the Indian Housing Block Grant (IHBG) program and the Title VI Loan Guarantee program.

This year, we worked to streamline our programs, strengthen communication, and ensure accountability.



HUD is committed to honoring our government-to-government

relationship with our Tribal partners and serving individuals and families in Indian Country. This dedication is evident through the work of our staff who firmly believe in HUD's mission to address housing needs in Tribal communities.

While challenges remain, I am inspired by the accomplishments Tribes and the Office of Native American Programs (ONAP) have achieved under NAHASDA's programs. Below are just a few of HUD's highlights from FY 2024:

- Timely awarded over \$1.1 billion in IHBG formula grants to provide affordable housing to low-income Native American families in Tribal communities;
- Expanded homeownership opportunities for Native American by guaranteeing over 1,182 loans through the Section 184 Indian Housing Loan Guarantee program; and
- Provided over 3,600 vital training and technical assistance sessions to help Tribes and Tribally Designated Housing Entities increase their capacity and technical expertise.

Finally, I would like to say waewaenen (thank you) to Tribal leaders, other community partners, and ONAP staff who continue to help make our work and this report possible.

Sincerely,

Heidi J. Frechette

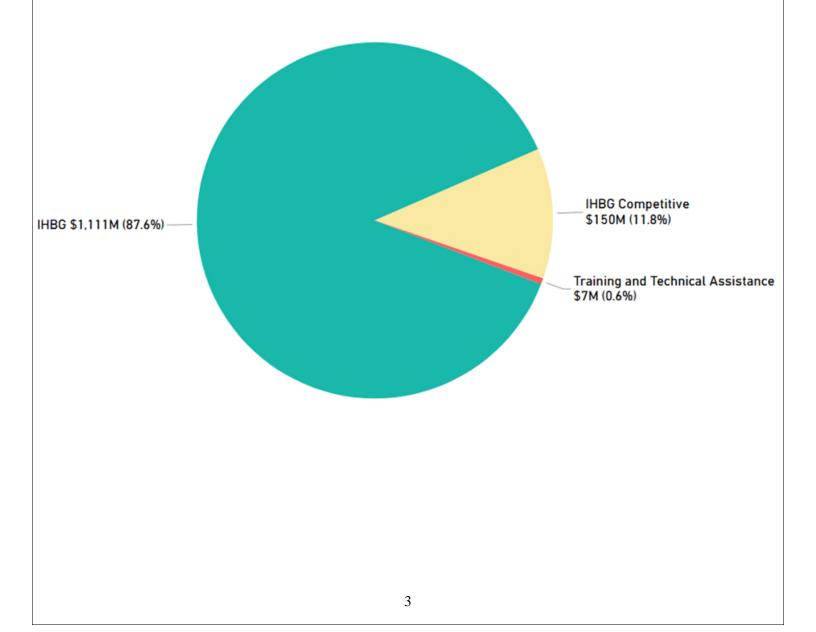
Heidi J. Frechette General Deputy Assistant Secretary Office of Public and Indian Housing

II. Background

A. Funding Summary

In FY 2024, Congress appropriated a total of \$1.3 billion for NAHASDA programs of which:

- \$1.1 billion was provided for IHBG formula grants;
- \$150 million was provided for IHBG competitive grants;
- \$1 million was provided to guarantee loans under the Title VI Loan Guarantee program; and
- \$7 million was provided to fund training and technical assistance for recipients of Native American programs.



III. Analysis

A. Indian Housing Block Grant Program

1. Program Overview

The IHBG program is authorized under Title I of NAHASDA. Under the program, HUD distributes block grants by formula annually to eligible Indian tribes or their Tribally Designated Housing Entity (TDHE). These recipients may use their IHBG funds to carry out a range of affordable housing activities that benefit low-income Native American families living on Indian reservations or in other Indian areas. In FY 2024, 595 Indian tribes were eligible to receive funding under the program. The minimum grant was \$110,039, the largest grant was \$132,961,091, and the median was \$488,142.

Regulations governing the IHBG program were initially developed with active Tribal participation through negotiated rulemaking. Program regulations were first issued in 1998 and are currently codified at 24 CFR part 1000. Since then, HUD and Indian tribes have conducted three additional negotiated rulemaking sessions, which resulted in regulatory changes that strengthened and improved the program. Over the years, this process has proven to be effective at furthering Tribal self-determination while also ensuring program accountability.

Today, the IHBG program is the single largest source of federal funding for housing in Indian Country, where safe, decent, affordable housing is desperately needed. Flexibility inherent in this self-determination program enables Indian tribes to design, develop, and operate their own affordable housing programs based on local needs and customs. IHBG funds can be leveraged and used as a catalyst for community and economic development. The program substantially contributes to stabilizing communities and building healthy economies within American Indian and Alaska Native communities, many of which are in rural areas. During the last decade, individual grants have ranged in size from about \$50,000 to about \$132 million, with a median grant of about \$305,450.

2. IHBG Formula and Grant Administration

The IHBG allocation formula, developed in consultation with Indian tribes under statutorily mandated negotiated rulemaking, is based on need and the number of existing housing units that were funded under the U.S. Housing Act of 1937 (before NAHASDA was enacted). Need is calculated using several weighted factors, such as the local population's income levels, condition of existing housing, and local housing costs. The formula data are drawn from the Decennial Census and the American Community Survey, with adjustments to spread the impact of data changes on individual grantees' yearly funding levels over several years.

To receive an IHBG grant, eligible Tribes are required to submit an Indian Housing Plan (IHP) annually to HUD. The IHP describes the grant recipient's planned affordable housing activities for its upcoming program year. The IHP is due at least 75 days before the grant recipient's program year begins. Grant recipients must also submit an Annual Performance Report (APR) to HUD within 90 days of the end of their program year. The APR details the actual activities and accomplishments of their IHBG-funded housing programs.

3. Grant Performance Tracking

As a part of HUD's ongoing information technology modernization efforts, ONAP is developing a cloud-based Grants Evaluation and Management System, referred to as GEMS. Last year, ONAP launched the IHBG program functionality and onboarded users in GEMS. Additionally, ONAP has developed performance indicators and tracks the progress made by IHBG recipients using a performance tracking database. ONAP updates this data weekly based on APRs and other information received from IHBG recipients. Most recently, ONAP has begun to expand functionality to include the Indian Community Development Block Grant (ICDBG) program. This work is essential in streamlining grant-related administrative functions and improving program efficiency.

B. IHBG Program Performance Cumulative Totals

Based on reported data, HUD estimates that between FY 1998 (the inception of the IHBG program) and the end of FY 2024:

- 43,711 affordable housing units have been built or acquired; and
- **117,432** affordable housing units have been rehabilitated.²

1. FY 2024 IHBG Formula Insights

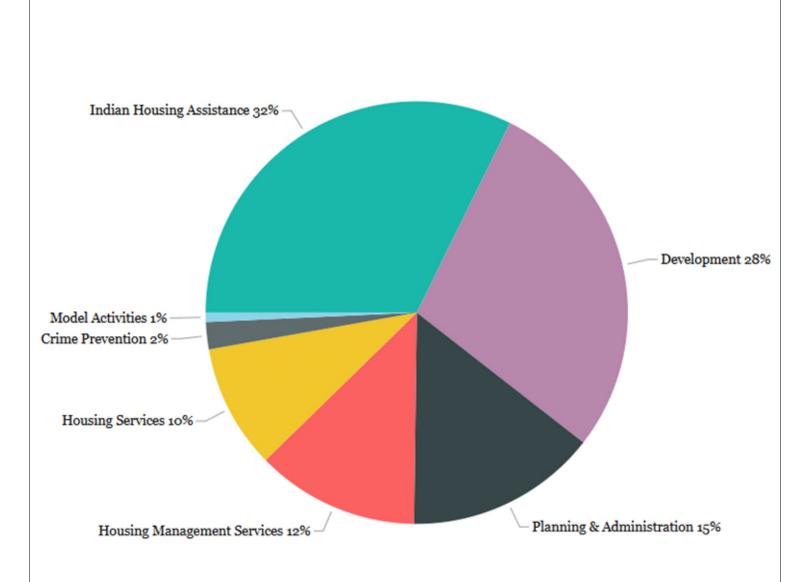
Based on reported data, HUD estimates that in FY 2024:

- **606** affordable housing units were built or acquired;
- **4,130** affordable housing units were rehabilitated;
- **35,573** affordable housing units, which were originally built or acquired with funding provided under the U.S. Housing Act of 1937, were maintained, and operated by IHBG recipients (29,996 Low Rent, 2,016 Mutual Help, 2 Turnkey, and 3,559 Section 8);
- 32 acres of land were purchased for the development of affordable housing; and
- Approximately 15 percent of total IHBG expenditures were for planning and administrative expenses.

2. FY 2024 IHBG Funding Breakdown

IHBG grantees have reported that a total of **\$628,390,184** in funding has been expended. In FY 2024, Tribes spent IHBG funds on the following eligible activities:

² Amount includes all types of unit rehabilitation as reported by the grantee. Grantees report on a rolling basis throughout a given fiscal year as APRs become due, and the total number of previously reported units rehabilitated in prior years are sometimes adjusted by grantees over time.



3. Indian Housing Assistance (\$203 million or 32% of the total)³

Indian Housing Assistance includes modernization and operating assistance for housing previously developed or operated under programs authorized under the U.S. Housing Act of 1937 (also known as Formula Current Assisted Stock (FCAS)) before enactment of NAHASDA. At the beginning of FY 2024, there were approximately **35,573** units in this inventory. Rent and utility subsidies for this housing stock are also included in this category.

4. Development (\$178 million or 28% of the total)

Development includes building, acquiring, and rehabilitating affordable housing units. Included in these eligible activities are real property acquisition, site improvement, development of utilities, utility services, conversion, demolition, financing, administration, planning, and other related activities.

5. Planning and Administrative Expenses (\$92 million or 15% of the total)

Administrative and planning expenses include the cost of administrative management, evaluation and monitoring, preparation of the IHP and the APR, staff and overhead costs directly related to carrying out affordable housing activities, and more.

6. Housing Management Services (\$79 million or 12% of the total)

Housing Management Services are management services for affordable housing, including preparation of work specifications, loan processing, inspections, tenant selection, management of tenant-based rental assistance, the costs of operation and maintenance of IHBG units, and management of affordable housing projects.

7. Housing Services (\$60 million or 10% of the total)

Housing Services are housing-related services for affordable housing, such as housing counseling for rental or homeownership assistance, establishment and support of resident organizations and resident management corporations, energy auditing, and activities related to self-sufficiency. This activity also includes other services related to assisting owners, tenants, contractors, and other entities participating in eligible housing activities, including rental and down payment assistance.

8. Other (Crime Prevention and Model Activities: \$18 million or 3% of the total)

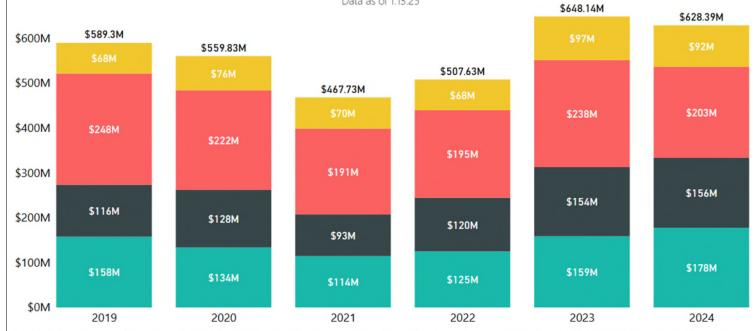
Crime Prevention and Safety includes safety, security, and law enforcement measures and activities appropriate to protect residents of affordable housing from crime. Model Activities are activities that are not included in the list of eligible activities under NAHASDA, but that HUD specifically approves under the IHBG program upon determining that the activities are designed to carry out the purposes of NAHASDA.

For further information about IHBG eligible activities, see Notice_PIH 2023-30.

C.IHBG Trends

Over the past few years, ONAP has identified a few trends related to how IHBG funds have been expended. These trends include:

- The modernization and operation of existing FCAS housing remains the single largest category of eligible activities carried out by IHBG recipients.
- The total amount of IHBG funds spent on eligible administrative costs has consistently remained at 12 to 15% for the previous five years. (See table below)
- IHBG recipients are continuing to dedicate more of their IHBG formula grant funds toward the rehabilitation of existing units.



IHBG Funds Expended by Eligible Activity (2019-2024) Data as of 1.13.25

Eligible Activity Category

Development

Housing Services, Housing Management Services, Crime Prevention

Model A...

Indian Housing Assistance

Planning and Admin

D. IHBG Competitive

1. Overview

In FY 2024, Congress appropriated \$150 million for competitive grants to eligible IHBG recipients authorized under NAHASDA in addition to formula-based funding. In awarding grants, Congress required HUD to consider funding based on need and administrative capacity, and to give priority to projects that would spur construction and rehabilitation.

Since its inception, the IHBG Competitive program has been very popular and is consistently oversubscribed given the level of funding available and the need for construction of new units. To date, Tribes have spent approximately \$303 million in IHBG Competitive resources. HUD projects that this program will continue to make a major positive impact as Tribes complete large construction projects made possible by the infusion of funding from the program.



Newly constructed affordable housing units in Chickasaw Nation Oklahoma. These units were funded by the IHBG Competitive program.

2. FY 2023 IHBG Competition

During FY 2024, HUD awarded \$150 million in competitive IHBG funds from FY 2023 appropriations to 41 Tribal communities (40 fully funded and one partially funded) for the development of 540 homeowner and rental units. 103 applications in total were received. 45 applications were deemed eligible but were not awarded a grant due to insufficient funding (an additional \$162 million would have been required).



Newly constructed affordable single-family home on the Fort Independence Indian Reservation in California. This unit was funded by the IHBG Competitive program.

E. Title VI

1. Overview

Under the Title VI Loan Guarantee Program, HUD guarantees 95 percent of outstanding principal and interest on a loan made by a private lender to an IHBG recipient to finance affordable housing activities and housing related community development activities, including construction, rehabilitation, infrastructure, constructing community facilities, acquiring land for housing, architectural/engineering plans, and to help fund financing costs. Borrowers pledge a portion of their current and future IHBG funds as security for the repayment of the federally guaranteed financial obligation. Historically, the primary use of Title VI loans has been the construction of housing units and related infrastructure.

2. Program Performance

Since the inception of the Title VI program in 1996, HUD has issued a total of 119 loan guarantees, totaling more than \$298 million. This has resulted in the development, rehabilitation, or installation of infrastructure for approximately 3,599 affordable housing units.

During FY 2024, three Title VI loan commitments were issued totaling \$10.2 million with loan guarantees to be issued in FY 2025:

- Thlopthlocco Tribal Town of Oklahoma will use the loan to build infrastructure for an 18-unit affordable elderly housing and tribal complex.
- Dry Creek Rancheria of the Pomo Indians of California will use the loan to finance offsite infrastructure improvements for a 25-unit affordable elderly housing project.
- The Keweenaw Bay Indian Community of Michigan will use the loan to construct a 25-unit supportive housing apartment complex.

While some lenders may have historically been hesitant to engage in lending on Tribal lands, the 95 percent guarantee has proven to be an effective incentive for lenders to finance the development of Tribal housing.



Construction of a new Dry Creek Rancheria community center development that will be supported through the Title VI program.

F. Training and Technical Assistance

1. FY 2024 Training Highlights

- 3,670 individuals received IHBG-focused training and technical assistance through ONAP-sponsored instructional resources.
- ONAP partnered with expert technical assistance providers to support 183 direct technical assistance training sessions.
- ONAP planned and facilitated issue-area focused training events focused on pressing needs in Indian Country.
- A total of 108 training sessions were held (either in-person or virtually). They covered such topics as Basic Financial Management, Developing and Financing Infrastructure, Program Income, Contract Administration and Procurement, Financial Management, Self-Monitoring, Admissions and Occupancy, and NAHASDA Essentials.
- ONAP hosted a national Tribal Housing Summit in St. Paul, Minnesota.

2. National Best Practice Webinars

ONAP offers a national best practice webinar series featuring innovative approaches to meeting housing needs in Tribal communities. Each webinar provides an in-depth overview of a housing project, planning, staffing, funding sources, construction methods, and lessons learned.

To date, ONAP has featured:

- Lummi Nation Housing Authority's <u>Sche'Lang'En</u> (Our Way of Life) Village, a 45-unit Transformational Housing project with supportive services located in Bellingham, Washington
- San Felipe Pueblo's <u>Black Mesa Subdivision</u>, a 150-unit subdivision
- Bering Strait's Regional Housing Authority's <u>Title VI project in Savoonga</u>, AK
- Housing Authority of the Choctaw Nation of Oklahoma's <u>Service</u> <u>Coordination Model</u>
- <u>Minnesota Tribal Collaborative</u> to Prevent and End Homelessness
- Muckleshoot and Salish and Kootenai Housing Authorities
- Partnerships Serving Homeless American Indian and Alaska Native Youth featuring Dena'Ina House (Anchorage, AK) and SHÉIYI XAAT HÍT (Juneau, AK)
- Chickasaw Nation Construction-Related Employment and Training Programs
- Swinomish Indian Tribal Community's <u>Tallawhalt II Section 184</u> Homeownership project
- Manufactured Housing and Tribal Communities
- <u>Highlights of Urban Indian Housing Projects</u>

The webinars are facilitated by ONAP's Deputy Assistant Secretary. Each webinar is recorded and posted on <u>www.hud.gov/codetalk</u>. In addition, ONAP partners with other federal agencies to host webinars on different topics, such as Federal Resources for Tribal Economic Development and the Department of Veterans Affairs' Native American Direct Loan program.



Muckleshoot Indian tribe affordable housing development featured in an ONAP training webinar.



Affordable housing unit funded by IHBG in Commanche Nation featured in an ONAP training webinar.

G.NAHASDA in Action

1. Northern Plains

Northern Ponca Tribe of Nebraska

The Northern Ponca Tribe of Nebraska used a variety of funding sources to construct the Ponca Heights development in Ralston, Nebraska. The project includes 20 homes for Elderly and disabled Tribal members, as well as a community center. The \$12 million project development includes \$5 million from IHBG competitive, \$900,000 from 2019/2020 ICDBG \$900,000, \$4 million in 2022 IHBG Competitive, and \$1.9 million from the Tribal Transportation Program. The ADA-accessible Community Center will provide Tribal Elders and Native Americans with disabilities living in the community a place for cultural practices and traditions.



Northern Ponca Tribe of Nebraska construction crew walking through the Ponca Height development worksite.

2. Northwest

Port Gamble S'Klallam Tribe



Port Gamble S'Klallam Tribe affordable Tribal elder housing development in Kingston, WA.

In July 2024, the Port Gamble S'Klallam Tribe held a grand opening for the Warrior Ridge I development in Kingston, Washington. The development includes 30 new housing units, which includes 15 one-bedroom apartments, 8 one-bedroom duplexes, and 7 single family homes. The development will allow Elders and low-income Tribal members – who had moved off the reservation due to the lack of housing – to return to their homelands. Funding for the development included \$385,000 in IHBG formula funds along with over \$11 million in non-Federal funding. The Tribe has already begun construction on Warrior Ridge Phase II, which will include an additional 30 housing units.

3. Southern Plains

Kickapoo Traditional Tribe of Texas



New affordable single-family housing in the Kickapoo Traditional Tribe of Texas community.

The Kickapoo Traditional Tribe of Texas receives approximately \$225,000 through the IHBG formula. Like other Tribes with limited formula funding, the Kickapoo Tribe saved their funding for several years to plan and construct new housing units. Their most recent project includes a 10-unit affordable housing expansion for eligible Native families in the Eagle Pass, Texas area. The total cost of this housing project was approximately \$2 million.

4. Southwest

Navajo Nation



New affordable single-family housing in the Navajo Nation.

The Navajo Housing Authority's (NHA's) Development and Construction Services Division (DCSD) completed predevelopment activities toward developing constructed units in Lukachukai, Arizona, in April 2024. The DCSD was successful in the solicitation services of a Design-Build Firm for the design and construction of 20 rental units in new development sites, which were based on feasibility and due diligence investigations conducted by the NHA and architectural and engineering consultants. The project was completed and resulted in the construction of 20 affordable housing units using IHBG funds. All units are currently occupied.

5. Eastern Woodlands

Sault Ste. Marie Tribe of Chippewa Indians



New affordable single-family housing developed by the Sault Tribe Housing Authority with IHBG funding.

The Sault Tribe Housing Authority (STHA) used \$400,000 of their IHBG formula towards the construction of 6 new housing units in the Odenaang housing development project. The Odenaang development consists of 40 affordable housing units located within Soo Township. These new housing units have decreased the Sault Ste. Marie's housing waiting list by 40 percent and increased STHA's current housing stock by 10 percent. The total development project took five years to complete and consists of a combination of stick built and modular two- and three-bedroom homes, including accessible units, for greater flexibility in serving Tribal families. This project was funded with various funding sources including \$2.9 million in IHBG formula funding, and \$5 million in IHBG Competitive funding.

6. Alaska

Cook Inlet Housing Authority

In July 2024, the Cook Inlet Housing Authority (CIHA) completed construction on the Providence Alaska House – Q'et'en Qenq'a permanent supportive housing project. The new development will provide much needed housing for Alaska Native Elders who are experiencing chronic homelessness and is located within the primary target area of the Municipality of Anchorage, centrally located in midtown. This project consists of a single four-story approximately 33,000 square foot building with 51 efficiency units, an entry lobby and mail station, resident management office, supportive service provider space, resident common areas programmed for computers, multipurpose use and kitchenette, common area laundry rooms, and secure resident storage. To finance this large building project, CIHA developed a capital stack from over a dozen sources including funding from the public and private sectors and from philanthropic groups.



Outside view of Cook Inlet Housing Authority's Providence Alaska House – Q'et'en Qenq'a permanent supportive housing project.

IV. Conclusion

This report describes the progress made in accomplishing the objectives of NAHASDA, summarizes the use of funds during the preceding fiscal year, and describes the aggregate outstanding loan guarantees under the Title VI Loan Guarantee program. Accordingly, HUD believes it has satisfied the requirement to submit an annual Report to Congress pursuant to Section 407 of NAHASDA.