

# Report on Alternative Data Sources

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

Contract #DU100C000021174, T001

Building Research Council  
University of Illinois at Urbana-Champaign

February 1, 2001

# Change the data

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1000.306 provides that

“The IHBG formula can be modified upon development of a set of measurable and verifiable data directly related to Indian and Alaska Native housing need.”

# Purpose

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- Assess the possibility of identifying new national data sources to replace the U.S. Census data
- Evaluate the potential of working with other viable alternative data sources to challenge U. S. Census data within the existing NAHASDA framework
- Provide suggestions on how to adjust and fine-tune key NAHASDA administrative practices that are based on Needs Data
- Present an assessment of the impact of special considerations on the implementation of NAHASDA
- Provide findings and offer recommendations on key NAHASDA administrative polices and practices.

# 6 Key Questions

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- Does the potential data source measure an **existing need variable**?
- Does any new data source have a **method** of data collection that is **consistent** across all states and tribal lands?
- Can the data source be **aggregated** to represent all counties and tribal lands?
- What evidence exists to support the **validity** of the collected data?
- Does the data source represent consistent units of **geography** that are not overlapping?
- Does the data source address **double counting**

# 6 More Key Questions

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- Are geographic units consistent with existing **Census geography**?
- Can the effects of **growth and mortality** be determined so that the current year can be represented?
- How often is the data collected and what is the period of **time** for collection?
- What was the original **purpose** for the data collection and ?
- What organization is **responsible** for collecting and maintaining the data?
- Is this data limited by requirements for **confidentiality**?

# Data Sources

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- BIA Indian Labor Force Report
- IHS Population User Data
- Head Start Early Childhood Education Program
- ICDBG Program
- Tribal Enrollment Records
- HA administrative records

# Potential Alternative Sources

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- Census 2000
- BIA
- IHS
- Head Start
- ICDBG
- Tribal Enrollment
- Administrative Records

# BIA

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## Strengths:

- One data collection form is used throughout the U. S.
- Aggregated on a national level and
- Published biennially in a standard report format.

## Weaknesses:

- Based on self-reporting
- No standard parameters on how to collect the data or how to geographically define total service areas.
- No consistent area definition
- No standard BIA review process
- Numbers are estimates and are not based on an actual household-to- household count.

# IHS

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## Strengths:

- The data is collected on a consistent, uniform, nationwide basis for AIAN persons utilizing health services

## Weaknesses:

- Information only on persons who use IHS
- No verification process to correlate information
- Not tied to service boundaries defined by geographical areas
- Records kept by zip codes not correlated with NAHASDA Formula Areas.
- Does not address housing characteristics specified in 24 CFR Part 1000.324
- Federal Privacy Act laws limit access to IHS data

# Head Start

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## Strengths:

- Data is collected on a consistent basis for all programs, across the nation
- Collected data can be is aggregated to local, regional, and national levels
- HHS has an Office of Central Data Collection that maintains the data and can aggregate data in various ways

## Weaknesses:

- Not all tribes offer Head Start programs
- Data collected may not match the requirements of NAHASDA.
- Each Head Start program has a defined service area that may or may not match Census geography used for Formula Areas
- Data is often gathered from multiple sources and there is a possibility of duplication
- Data does not address housing conditions

# ICDBG

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## Strengths:

- Data is requested on a consistent basis across the nation
- Data is timely
- Considerable overlap in the kinds of information generated by ICDBG and NAHASDA
- HUD is the parent agency to both programs and data may be shared among programs

## Weaknesses:

- Does not maintain a national or regional database
- Service area defined for the proposed project
- Income level is determined by median family income
- Verification of statistical methods not as stringent as NAHASDA

# Tribal Enrollment Data

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## Strengths:

- Records may be continually updated and thus more current than those in the decennial Census.
- There may be an incentive on the part of the members of the tribe to provide accurate and reliably updated information
- There may be an incentive for the tribe to maintain precise records

## Weaknesses:

- No guarantees that all tribes maintain thorough and accurate records.
- No existing central repository of records or data
- No existing mechanism to collect the data

# Administrative Records

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## Strengths:

- Administrative records provide a source of information on income, number of persons, and housing unit size
- Easily accessible for verification

## Weaknesses:

- Less than one half of the total tribes have access to records
- TDHEs no longer have to revise forms
- No mechanisms currently exist to tap into other agency sources for administrative records

# United States Privacy Act Of 1974

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- Applies to the collection and maintenance of all Federal government records
- Requires that each agency develop its own policies and practices regarding storage, retrievability, access control, retention, and disposal of records.

# Case Studies

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The case studies examine:

- Alternative approaches to overlapping geographic areas
- Urban area issues
- Use of lower level census tract data to urban and non-urban areas
- Use of BIA Tribal Enrollment data to split overlapping areas

# Findings & Recommendations

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## Census Data

- **Finding:**

The U.S. Census data is considered to be most comprehensive and reliable source of information collected nationwide on housing and population characteristics.

- **Recommendation:**

At this time, we recommend that HUD continue to use U.S. Census data in the program.

# Findings & Recommendations

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## Existing Data Sources

- **Finding:**

No single data source was found to be capable of providing information on all seven needs variables, but several may provide data for individual population and income variables.

- **Recommendation:**

Development of an administrative guideline for tribes, which outlines potential problems involved in using alternative data sources and provides suggestions on how to handle inconsistencies among matching data variables and service areas, and the inability of the data source to address all the seven needs variables.

# Findings & Recommendations

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## **Tribal Enrollment Data & TDHE Administrative Records**

- **Finding:**

Some tribes, particularly those with per capita payments, maintain thorough enrollment and administrative records.

- **Recommendation:**

We recommend that HUD continue to accept tribal enrollment records from tribes with per capita payments. Use of tribal enrollment data can be expanded by not being tied to site review, and that consistent criteria be developed to verify the data accuracy. A guidance piece addressing specific aspects of the data collection process should be developed.

# Findings & Recommendations

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## Splitting Overlapping Areas

- **Finding:**

Another method needs to be developed for proportionately dividing Need data in overlapping areas.

- **Recommendation:**

We recommend examining smaller geographic units to proportionately divide data in overlapping areas.

# Findings & Recommendations

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## Federal Privacy Act

- **Finding:**

Data available from the programs administered by the HHS, BIA, and HUD are subject to the Privacy Act of 1974. The result is that available existing data from these agencies can only be provided in an aggregated format, without any identifying individual characteristics.

- **Recommendation:**

HUD should explore the development of data sharing agreements with those other agencies.

# Conclusion

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- U.S. Census data is the most consistent data available that can be applied throughout the U.S.
- Improvement in the creation of equitable Formula Areas in urban areas would likely result from the use of census tract (CT) data. CT data might resolve overlapping Formula Area issues.
- It is believed that the positive benefit to the formula program would outweigh any additional burden in the collection process.
- While individual tribes may find collection of alternative to be useful, it is always done at a cost. Surveys can easily cost \$100 per completion.