



United Native American Housing Association

Jason Adams, Chairman

PO Box 38
Pablo, MT 59855

"Tribes Helping Tribes"

August 26, 2014

Julian Castro, Secretary
U.S. Department of Housing and Urban Development
451 7th Street S.W. 10th Floor
Washington, D.C. 20410

Dear Secretary Castro:

On August 12th of this year, the United Native American Housing Association (UNAHA) held their summer meeting in Cedar City Utah. The well attended meeting allowed Indian Housing professionals from seven states (Utah, Montana, South Dakota, North Dakota, Wyoming, Colorado and Nebraska) to discuss several recent changes proposed by your office to the HUD 184 Loan Guarantee Program. We are concerned about the direction and future of this vital program and the lack of HUD consultation and discussion with Indian Country prior to HUD's intended action to implement the apparently unilateral changes.

The HUD 184 Program as originally enacted was unique in the fact that it was specifically designed for the unmet mortgage needs of American Indians living on lands held in trust by the United States Government. It was imbedded within the Office of Native American Programs so that as the program grew, regulations and program management could adjust to imperfections in the lending market on trust lands. The program has been expanded unilaterally by HUD without consultation and negotiation to include eligible Native families living off federal trust lands or reservations. That expansion caused the program to grow substantially, but has also threatened the continued viability of the program to serve the target borrowers, namely Native families living on their trust land reservations. Three recent fee escalations have been proposed without discussion with tribes. We are very concerned about this direction and respectfully request that HUD sponsor a summit to discuss the program thoroughly. We would like to give direction and share the lessons we have learned in the 20 years since the program was created, to hear from HUD staff the justification for program changes and fee increases and to recommit to the lending partnership our Tribes enjoy with HUD. The opportunity to meet the future housing needs of Indian tribes around the program depends on the future of this program.

We have attached a resolution passed unanimously by our members in attendance. This position was formulated following lengthy discussion and debate. UHAHA intends to seek Tribal Council resolutions from our 34 members supporting our position on this critical Indian housing matter.

If I can answer any questions related to our position and concerns, please do not hesitate to call me at 406-675-4491.

Respectfully submitted,

signed

UNAHA Board Members

Sharon Vogel-Vice Chairman
Cheyenne River Housing Authority
PO 480
Eagle Butte, SD 57625

Iva Grainger - Secretary
Fort Peck Housing Authority
PO Box 667
Poplar, MT 59255

Doug Yankton Sr.-Treasurer
Spirit Lake Housing Authority
PO Box 203
Fort Totten, ND 58335

Gauthier Agency LLC
Administrator
63316 US HWY 93
Ronan, MT 59864

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