UNITED NATIVE AMERICAN HOUSING ASSOCIATION RESOLUTION #2023-04

A RESOLUTION REQUESTING TRIBAL CONSULTATION ON HUD ONAP PROPOSED SECTION 184 LOAN HANDBOOK

- WHEREAS, the United Native American Housing Association (UNAHA) is comprised of individual member Indian Housing Authorities, Tribally Designated Housing Entities (TDHEs), and Tribes from the states of Colorado, Wyoming, Nebraska, South Dakota, North Dakota, Montana and Utah; and
- WHEREAS, UNAHA members and other TDHEs throughout the country have submitted comments on the long-overdue regulations that make unilateral changes to the Section 184 Loan Guarantee Program. Through this process HUD has announced that it will also prepare a proposed handbook that will include details on how to implement 184 loans and lending under the new regulations; and
- WHEREAS, Previous changes to the 184 Program initiated by HUD have made the program increasingly more difficult to use and less successful at generating homeownership in trust land areas, especially on land-based reservations; and
- WHEREAS, HUD-ONAP is bound by Presidential Executive Orders and its own internal policy to hold meaningful face-to-face consultation with Tribes and TDHEs when the department contemplates program changes that will directly affect the interests of the Tribes and TDHEs, but has failed to do so in this instance,

NOW THEREFORE BE IT RESOLVED that UNAHA opposes HUD's unilaterally-proposed changes to the Section 184 Loan Guarantee Program, including the preparation of a program handbook where most of the program details will be included; and

BE IT FURTHER RESOLVED that the UNAHA calls on HUD to implement meaningful face-to-face consultation with Tribes and TDHEs before, during, and after HUD produces the proposed184 Loan Guarantee Program handbook.

CERTIFICATION

I hereby certify that the foregoing Resolution was adopted during a duly called, noticed and convened Annual Meeting assembled for business in Lakewood, Colorado on the 4th day of April, 2023, with 29 members present to constitute a quorum and by a vote of ALL members voting FOR, NO members Opposed, and NONE not voting.

Sharon Vogel

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