

Yankton Sioux Tribe

Housing Needs and Homeownership Study



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CONSULTING



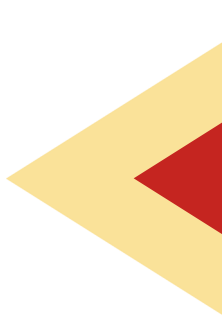
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Executive Summary

Project Purpose and Goals. The Yankton Sioux Tribe Housing Needs and Homeownership Study was conducted by Big Water Consulting (Big Water) in cooperation with the Yankton Sioux Tribe (YST) and with support from Lakota Funds, the South Dakota Housing Development Authority, and the South Dakota Native Homeownership Coalition (SDNHC). The purpose of the study was to understand the housing needs within the Yankton Reservation, as well as the barriers and opportunities related to homeownership. In addition to the general purpose, the study aimed to determine the needs, homeownership preferences, and affordability criteria of three specific target populations: tribal employees, tribal members nearing retirement, and veterans. The results of the study will inform the planning of future housing development and support the design, development, and refinement of homeownership education, financial literacy, and credit building programs led by the Yankton Sioux Housing Authority (YSHA), the nascent Community Development Financial Institution (CDFI), and other stakeholders.

Methodology. The study consisted of three related components: (1) analysis of existing housing and economic development data; (2) an intercept survey and targeted sampling of potential homeowners; and (3) interviews of knowledgeable sources. Data from the American Community Survey (ACS), the South Dakota Department of Labor (DOL), the U.S. Department of Housing and Urban Development (HUD), and the Yankton Sioux Tribe's website were used to explore population trends; housing availability, conditions, and cost; and the general economic and employment context. The intercept survey was used to gather basic demographics, as well as information on employment, finances, current housing situation, housing preferences, and barriers and services associated with homeownership. Interviews were conducted with four individuals familiar with housing, lending, and homeownership on the Yankton Reservation to provide additional context and depth to the results.

Major Findings. A selection of key findings from each component is provided below.

Analysis of Existing Data

- According to ACS estimates, over three-fourths of existing housing units on the Yankton Reservation are over 30 years old.
- Given an estimated population growth of 442 people in the next 15 years, in order to meet additional housing and maintain the current ratio of 2.59 persons per housing unit, a minimum of 171 additional units would need to be constructed or rehabilitated.
- Facilitating the safe occupancy of vacant units could help alleviate some of the projected housing strain.

Intercept Survey

- A total of 112 community members who were interested in homeownership completed the survey; differences between the target populations are noted within the main report, but results were generally similar across groups.

- 16.7% of respondents were living doubled-up with family or friends and 40.0% of respondent households had members who would like to live separately.
- 93.6% of respondents thought it was challenging to find affordable, quality housing to buy on the reservation.
- Over 90% of respondents thought they would have either no options or only 1-2 options if they were looking for a new place to rent.
- 77.5% of respondents were interested in purchasing a home in a new YST development. Top reasons for their interest included safety, financial benefits, and the ability to design a home.
- Survey respondents were most interested in single-family units and units with 4 bedrooms and 2 bathrooms. More than a third (35.5%) of the respondents needed handicap-accessible features in their homes.
- The biggest perceived barriers to homeownership included saving enough for a down payment and closing costs, poor credit history, not enough income to pay a mortgage, and low credit score.
- Respondents reported a median affordable mortgage payment of \$336.
- 20.9% of respondents were uncertain how difficult it would be to get a mortgage; 43.6% were uncertain as to what a reasonable interest rate would be.
- Only 51.4% of respondents had individual checking accounts and only 61.3% had individual savings accounts.
- About 45% of respondents were tribal employees; nearly 70% had two or more payroll deductions per pay period.
- Over two-thirds of respondents (67.2%) rated their credit score as either “Fair” or “Poor” and 10% were uncertain of their score; however, less than half of respondents indicated a need for financial coaching (47.3%) and over one-quarter of respondents were uncertain whether they would need financial coaching (25.8%) or credit rebuilder services (30.9%).
- 87.4% of respondents indicated their household would need home loan/ down payment assistance; over 60% indicated they would need homeownership education (64.5%) and home maintenance classes (62.8%) to prepare for homeownership.

Key Informant Interviews

- There is limited availability of easily-developed land and both fair market and affordable housing on the reservation.
- The “checkerboard” nature of reservation and off-reservation trust lands makes infrastructure development challenging and costly; one interviewee noted that it was not that difficult to get a home site lease, but that many lots don’t have infrastructure and are not easy to set up.
- Remediating housing units impacted by meth is critical to increasing housing availability (this is the main reason why units are boarded up), but there are limitations on funding and reporting mechanisms.
- Multiple interviewees emphasized the value of homeownership; however, one expressed reservations about promoting it too heavily because of the stability, responsibility, and education required to successfully own and maintain a home.

- Homeownership programs are “just coming alive” on the reservation and encouragement, outreach, and education are critical.
- The steps and costs associated with purchasing or building a home are not well-known by most people living on the reservation; many may also be unfamiliar with maintenance and other responsibilities of homeownership.
- A personal connection with someone who was responsive and walked prospective homeowners through the processes and paperwork was an important factor in successfully purchasing or building a home.
- Several interviewees highlighted the importance of good credit, the challenges related to credit for many on the reservation, and the need for education related to credit and finances.
- Lending and down payment requirements can be a challenge for those living on the reservation; the Tribe and program officers for lenders may be able to help individuals overcome these challenges through mechanisms such as direct loans from the Tribe, 50/50 programs, down payment assistance, and emphasizing stable, consistent income over credit scores.
- There are limited lending options for both purchase and repairs on tribal land; USDA 502 loans were recommended where feasible by multiple interviewees.
- Local lenders and homeowners are further impacted by gaps in federal processes and outreach related to the Section 184 program; for example, prolonged delays in BIA’s issuance of Title Status Reports has jeopardized loan guarantees provided by HUD.
- USDA, 1st Tribal Lending, the VA Home Loan program, and the South Dakota Housing Development Authority (SDHDA) were specifically mentioned as resources; SDNHC’s role in creating awareness was also highlighted.

Recommendations. Three major themes were identified across the study components: a lack of available housing, financial challenges related to credit and lending, and a lack of familiarity with the home buying and development process. Based on the findings, Big Water makes the following policy and program recommendations.

Housing

- Increase the available housing stock by rehabilitating vacant homes and building new housing units.
- Explore options to clearly document meth issues and costs in formal documents like the Indian Housing Plan; consider gathering a regional working group to explore and share options to pay for testing and remediation.
- Leverage data on overcrowding, income, ownership and occupancy, as well as respondents’ stated preferences and needs, to inform development planning and support grant applications.
- Explore how potential homeowners define “safety” and what community features or amenities would satisfy their definition; include these features in the design of new construction and rehabilitated units.

- Include energy efficiency features in the design of new construction and rehabilitated units.
- Consider convening a group of potential homeowners to contribute to the design of a set of flexible home plans for new construction.
- Explore the feasibility of a program that facilitates the purchase of larger family home sites that could support multiple housing units.
- Consider completing unit condition assessments of current housing stock to better characterize, plan for and prioritize repairs, and support grant applications for new development and rehabilitation.

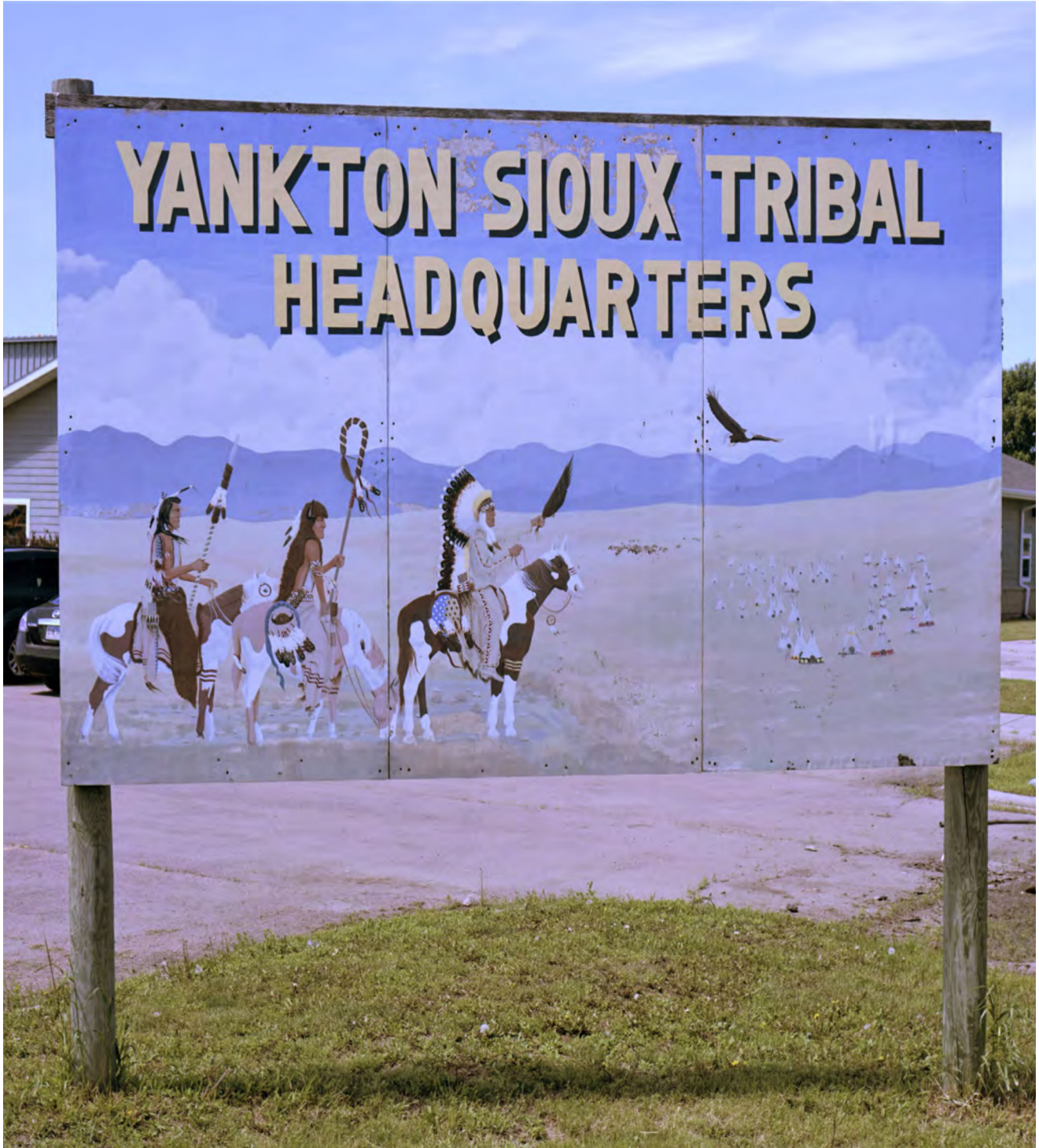
Homeownership Services

- Support the new CDFI in efforts to get certified to conduct homebuyer readiness and financial literacy classes and work with YSHA and the CDFI to develop, promote, and implement a comprehensive homeownership preparation program that provides financial literacy, credit repair and coaching, homeownership education, and homebuyer assistance and counseling.
- Conduct home maintenance and repair courses to train future homeowners on how to maintain the quality and condition of their homes after purchase.
- Consider dedicating tribal resources to helping potential homeowners navigate the bureaucracy and paperwork associated with buying a home.
- Build on the fairs held in the past and convene homeownership forums that include successful home purchasers and lenders/individuals who have shown a dedication to helping those on tribal lands achieve homeownership in order to encourage personal relationships, advocacy, and mentorship.
- Work with the tribe and local lenders to further develop contextually appropriate home loan and down payment assistance options.
- Work with lenders to explore the feasibility of altering the weighting of income and credit in lending formulas, particularly in the case of veterans with consistent income such as VA Disability Compensation.
- Advocate with BIA, HUD, and local lenders to streamline the lending process, decrease service gaps and risk, and facilitate homeownership on reservation and trust land.

Financial Services

- Conduct systematic outreach regarding available financial services and their purpose and value, including checking and savings accounts, retirement plans, credit repair and financial coaching.
- Require electronic deposit of staff payroll as a means of ensuring that tribal employees have a business relationship with a bank and the services they offer.
- Work with local banks and lenders to ensure that loans are reported to credit agencies to build the credit history of reservation residents.

- Develop and distribute materials explaining the damaging consequences of short-term/ payday loans and loans for depreciating assets such as cars and consumer electronics.
- Collaborate with local lenders to create micro-credit opportunities for potential homeowners to begin developing a credit history or to allow others to repair their credit.



Background

With support from Lakota Funds, the South Dakota Housing Development Authority, and the South Dakota Native Homeownership Coalition (SDNHC), Big Water Consulting was contracted to conduct a Housing Needs and Homeownership Study for the Yankton Sioux Tribe (YST). SDNHC previously contracted Big Water Consulting to perform two Housing Needs Assessments for the Cheyenne River Housing Authority (CRHA) and the Rosebud Economic Development Corporation (REDCO). These studies, completed in 2017, provided data and recommendations to CRHA and REDCO to support them in their goals of meeting housing needs and increasing homeownership.

The purpose of the current study is to better understand the housing needs within the Yankton Reservation, as well as the barriers to and opportunities for homeownership. In addition to the general purpose, the study aimed to determine the needs, homeownership preferences, and affordability criteria of three specific target populations: tribal employees, tribal members nearing retirement, and veterans. The results of the study will inform the planning of future housing development and support the design, development, and refinement of homeownership education, financial literacy and credit building programs led by the Yankton Housing Authority, the nascent Community Development Financial Institution (CDFI), and other stakeholders.

The Yankton Reservation is the home of the Ihanktonwan Dakota Oyate (“People of the End Village”) and has a land base of 36,741 acres. The reservation is located along the Missouri River in south central South Dakota, covering the eastern half of Charles Mix County. See Figure 1 for a map of the surrounding area. According to the U.S. Census Bureau’s 2017 American Community Survey, an estimated 6,676 people live on the Yankton Reservation.

The Yankton Sioux Housing Authority (YSHA) was established in 1963 and the first housing development built using HUD funds broke ground shortly thereafter in Greenwood. According to YSHA’s Executive Director (ED), additional development occurred in 1974, 1996, and 1998. There has been no development since. Currently, YSHA manages 287 housing units, 284 of which are rentals. The communities of Marty, Lake Andes, and Wagner each have an elder complex; the one in Wagner is the largest with 38 units.

YSHA currently manages four Low Income Housing Tax Credit projects in three communities and is now working on a fifth consisting of 15 new units and 15 rehab units. Additional complexes with 26 units have been purchased in Wagner for teacher housing; these will be rehabbed using Federal Home Loan Bank funds that YSHA recently obtained. YSHA is also teaming with local lender 1st Tribal Lending to apply for an Indian Community Development Block Grant to be put towards new development.

Figure 1 | Yankton Reservation and surrounding areas



Map data sources: U.S. Census, TIGER/Line Shapefiles, 2018, and USGS National Transportation Dataset (NTD). Accessed 2019.

Federally-funded housing programs have not been sufficient in easing the housing shortage on the reservation, however. For example, the Indian Housing Block Grant (IHBG), enabled by the passage of Native American Housing Assistance and Self-Determination Act (NAHASDA), was intended to be spent on the development of new units in addition to the maintenance and operation of existing units. However, IHBG funds have been increasingly used towards housing unit renovation/rehabilitation rather than development. Additional sources of federal funding¹ exist and YSHA has leveraged some of these options, but they can be difficult to get. Many of these grants are limited to a small number of participants, competitively awarded and/or subject to rent collection and other technical requirements which limit recipients' and their residents' ability to apply for or participate in these programs. This study aimed to collect data that would help YST and YSHA better advocate for support from a variety of funding sources and partners to better meet the housing needs of Yankton Reservation residents.

¹ Examples include Low-Income Housing Tax Credits (LIHTC) allocated by state agencies, Indian Health Service (IHS) funding for housing unit sanitation and infrastructure development, the Tribal HUD-VA Supportive Housing (Tribal HUD-VASH) program, USDA Rural Development grants, and Indian Community Development Block Grants.

Methodology

The Housing Needs and Homeownership Study consisted of three related components: (1) analysis of existing housing and economic development data; (2) an intercept survey and targeted sampling of potential homeowners; and (3) interviews of knowledgeable sources. An overview of each component is provided below.

Analysis of Existing Data

Existing data were collected from the American Community Survey (ACS), the South Dakota Department of Labor (DOL), the U.S. Department of Housing and Urban Development (HUD), and the Yankton Sioux Tribe's website. Additional information was collected from the Tribe's housing authority.

The ACS is an ongoing survey run by the U.S. Census Bureau. The most recent ACS data for the Yankton Reservation (2017) was obtained through American Fact Finder² and used to estimate population trends, vacancy, housing stock, overcrowding, property values, cost burden and to look at local economic and employment conditions. While ACS data has limitations and may not fully represent the characteristics of populations or housing on reservations, it is the most consistent data currently available and can serve as a starting point for comparison.

The South Dakota DOL's Labor Market Information Center was used to explore more detailed economic and employment data at the regional level. Additional economic data were collected from the Yankton Sioux Tribe's website. Finally, data from HUD were used to find local median and Fair Market Rent rates to help determine current local housing costs.

Intercept Survey

An intercept survey was used to gather basic demographics, as well as information on employment, finances, current housing situation, housing preferences, and barriers and services associated with homeownership. The survey content incorporated the comments and suggestions from a variety of stakeholders, including Yankton Sioux Housing Authority staff members.

Surveys were made available in both paper and online formats and administered from August 7th to October 5th, 2018. The paper survey form is included as Appendix A. Tribal employees, tribal members nearing retirement, and veterans were targeted through a variety

²American Fact Finder. U.S. Census Bureau. <https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>

of public relations activities and through distribution via population-specific channels such as employee email lists. Only individuals that expressed an interest in homeownership were asked to complete the survey. Please note that data collected through this intercept survey are not (and were not intended to be) statistically representative of the entire population on the Yankton Reservation. These results serve the objective of this study by providing insights into the current housing contexts and preferences of specific populations interested in homeownership.

Paper survey forms were delivered to Big Water’s office in Seattle, Washington, where they were then scanned using SNAP survey software. The online survey form was created by Big Water and hosted through LimeSurvey, an open-source online survey tool.

Once data collection closed, data from various survey platforms were downloaded as separate .csv files. A codebook was prepared to ensure data consistency, facilitate the integration of separate data files into a single dataset, and serve as a reference for later analysis and reporting. Data were cleaned and analyzed using R.

Key Informant Interviews

Interviews were conducted with four individuals who have perspectives on lending and homeownership on the Yankton Reservation as tribal employees, lenders, and/or tribal members: Juel Burnette of 1st Tribal Lending, Kenny Cook (YST Tribal Treasurer), Galicia Drapeau (Executive Director, YSHA), and Dennis W. Rucker (YST Tribal Veteran Service Officer). These interviews provided additional context and depth to the data obtained through existing sources and through the intercept survey, revealing knowledge, perspectives and experiences that might not have otherwise been captured. Interviews were conducted over the phone in February and March 2019. Interview guides are included as Appendix B.



Analysis of Existing Data

The Census Bureau’s 2017 American Community Survey estimates that there are a total of 6,676 people living on the Yankton Reservation. The total number of housing units is estimated to be 2,578, with a vacancy rate of 18.5%. A review of available information related to population trends, housing availability, conditions, and cost, as well as the general economic context of the Yankton Reservation, is provided below.

Recent Population and Housing Trends

The U.S. Census Bureau estimates that there was a net addition of 99 units on the reservation from 1990 to 2017 (see Table 1). As noted above, according to YSHA’s Executive Director, the last new YSHA development occurred in 1998. In 1990, when there were an estimated 2,479 housing units and 6,269 people, there was one unit for every 2.53 people. Over the same 27 year period, the estimated population of the Yankton Reservation increased by 407. Given the estimated population growth, in order to maintain the same ratio of housing units to persons, a net of 161 units would need to have been added over this time, or at least 62 more units than what the ACS estimates were built or rehabilitated.

Table 1 | Estimated number and occupancy status of housing units on the Yankton reservation

Year	Total Units	Occupied	Vacant
1990 Decennial Census	2,479	2,143	336
2000 Decennial Census	2,581	2,214	367
2010 ACS 5-Year Estimates	2,663	2,165	498
2017 ACS 5-Year Estimates	2,578	2,102	476

Vacancy

The lack of new housing is especially problematic given that the estimated number of vacant units increased at a higher rate than the number of total units from 1990 to 2017. According to ACS estimates, there were more people occupying fewer housing units in 2017 than there were in 1990. There were an estimated 110 more vacant units on the Yankton Reservation in 2017 than there were in 1990 (see Table 2). The increase in vacant housing is largely due to an increase in housing for seasonal, recreational, or occasional use as well as an increased number of uncategorized “other vacant” units. There was also a notable decrease in vacant units that were rented or sold but not occupied in the 2017 ACS when compared to 1990 Census data.

Table 2 | Vacant units by vacancy status

Vacancy Status	1990 Census	ACS 2017
For rent	48	69
For sale only	34	35
Rented or sold, not occupied	72	33
For seasonal, recreational, or occasional use	87	144
For migrant workers	3	0
Other vacant	92	195
Vacant	336	476

Aging Housing Stock

The current housing stock of the Yankton Reservation is aging: 68% of extant housing is estimated to have been built prior to 1980; the vast majority of housing is more than 40 years old. Yankton Reservation has a much higher proportion of housing built prior to 1939 in comparison to South Dakota and United States (see Table 3).

Table 3 | Age of housing structures

Estimate	Yankton Reservation		South Dakota	United States
	Units	Percentage	Percentage	Percentage
Built 2014 or later	26	1%	3.0%	0.9%
Built 2010 to 2013	43	1.7%	6.7%	2.3%
Built 2000 to 2009	169	6.6%	12.8%	14.5%
Built 1990 to 1999	331	12.8%	10.9%	14%
Built 1980 to 1989	254	9.9%	11.4%	13.6%
Built 1970 to 1979	455	17.6%	18.5%	15.5%
Built 1960 to 1969	241	9.3%	9.5%	10.8%
Built 1950 to 1959	263	10.2%	9%	10.5%
Built 1940 to 1949	103	4%	4.5%	5.1%
Built 1939 or earlier	693	26.9%	13.7%	12.9%
Total Units:	2,578	-	-	-

Data source: ACS 2013-2017 5-Year Estimates

Overcrowding

Consistent with a growing population and a shrinking housing supply, Yankton has high estimated rates of overcrowding in renter-occupied units. HUD defines overcrowding as having more than 1 persons-per-room living in a dwelling unit, and severe overcrowding as more

than 1.5 persons-per-room.³ Overcrowding is symptomatic of a lack of affordable housing, and results in a number of problematic outcomes. Overcrowding has been linked to worse school performance among children living in crowded housing; increased rates of communicable diseases and increased child mortality; poor mental health outcomes; and personal safety issues including child maltreatment.⁴ On the Yankton Reservation, those living in renter-occupied units are estimated to face overcrowding at 1.4 times the rate of the United States and 2.3 times the rate of South Dakota (see Table 4). According to ACS estimates, rates of overcrowding in owner-occupied units are comparable to those of the U.S., but almost twice those of South Dakota; the number of units is relatively small, however.

Table 4 | Persons per room in owner occupied and renter occupied units

Estimate	Yankton Reservation		South Dakota	United States
	Units	Percentage	Percentage	Percentage
Total:	2,102			
Owner occupied:	1,354			
0.50 or less persons per room	1,075	79.4%	83.2%	77.6%
0.51 to 1.00 persons per room	256	18.9%	15.8%	20.6%
1.01 to 1.50 persons per room	12	0.9%	0.8%	1.3%
1.51 to 2.00 persons per room	4	0.3%	0.1%	0.3%
2.01 or more persons per room	7	0.5%	0%	0.1%
Renter occupied:	748			
0.50 or less persons per room	429	57.4%	68%	58.6%
0.51 to 1.00 persons per room	254	34.0%	28.2%	35.2%
1.01 to 1.50 persons per room	51	6.8%	2.2%	4.1%
1.51 to 2.00 persons per room	10	1.3%	1.2%	1.6%
2.01 or more persons per room	4	0.5%	0.4%	0.5%

Data sources: US Decennial Census, and ACS 5-Year Estimates

Property Values

On the Yankton Reservation, property values are considerably lower than the national average. According to ACS 2017 data, the average owner-occupied home value for homes with a mortgage in the U.S. is \$214,500. Meanwhile, on the reservation, the estimated median value for owner-occupied housing units with a current mortgage is \$107,900, or about half the estimated value of a house in the U.S. overall.

³ Measuring Overcrowding in Housing, HUD, September 2007. https://www.huduser.gov/publications/pdf/measuring_overcrowding_in_hsg.pdf

⁴ *ibid*

Cost Burden

Related to low housing prices, as well as overcrowding that leads to an increased household income in proportion to rent, the 2017 ACS estimates show that rent burdens in Yankton trend lower than those in South Dakota and in the United States. However, about 25% of renters were estimated to be rent burdened, paying more than 30% of their income on housing. 22% of homeowners paying a mortgage were cost burdened, and 15% of homeowners without a mortgage were estimated to be cost burdened (see Table 5 and Table 6).

Table 5 | Gross rent as a percentage of household income

	Yankton Reservation		South Dakota	United States
	Units	Percentage	Percentage	Percentage
Total occupied units paying rent:	748			
Less than 10.0 percent	84	11.2%	5.6%	3.6%
10.0 to 14.9 percent	124	16.6%	10.4%	8.0%
15.0 to 19.9 percent	90	12%	14.7%	11.6%
20.0 to 24.9 percent	66	8.8%	13.5%	11.8%
25.0 to 29.9 percent	76	10.2%	10.4%	10.7%
30.0 to 34.9 percent	53	7.1%	7.5%	8.5%
35.0 to 39.9 percent	26	3.5%	5.2%	6.2%
40.0 to 49.9 percent	30	4.0%	6.7%	8.5%
50.0 percent or more	74	9.9%	17.5%	23.7%
Not computed	125	16.7%	8.4%	7.4%

Data source: ACS 2013-2017 5-Year Estimates

Table 6 | Selected monthly owner costs as a percentage of household income by mortgage status

Estimate	Yankton Reservation		South Dakota	United States
	Units	Percentage	Percentage	Percentage
Housing units with a mortgage:	477			
Less than 10.0 percent	67	14.0%	8.1%	7.2%
10.0 to 14.9 percent	105	22.0%	18.9%	16.5%
15.0 to 19.9 percent	99	20.8%	23.6%	19.8%
20.0 to 24.9 percent	65	13.6%	16.7%	15.8%
25.0 to 29.9 percent	34	7.1%	11.0%	10.8%
30.0 to 34.9 percent	21	4.4%	6.1%	7.2%

Table 6 Cont'd | Selected monthly owner costs as a percentage of household income by mortgage status

Estimate	Yankton Reservation		South Dakota	United States
	Units	Percentage	Percentage	Percentage
35.0 to 39.9 percent	30	6.3%	3.7%	4.8%
40.0 to 49.9 percent	20	4.2%	4.4%	5.8%
50.0 percent or more	34	7.1%	7.1%	11.6%
Not computed	2	0.4%	0.3%	0.5%
Housing units without a mortgage:	877			
Less than 10.0 percent	390	44.5%	47.4%	43%
10.0 to 14.9 percent	145	16.5%	19.9%	19.3%
15.0 to 19.9 percent	97	11.1%	10.9%	11.2%
20.0 to 24.9 percent	71	8.1%	5.9%	6.9%
25.0 to 29.9 percent	27	3.1%	4.0%	4.4%
30.0 to 34.9 percent	41	4.7%	2.5%	3.0%
35.0 to 39.9 percent	17	1.9%	1.7%	2.1%
40.0 to 49.9 percent	30	3.4%	2.3%	2.7%
50.0 percent or more	43	4.9%	4.1%	6.0%
Not computed	16	1.8%	1.2%	1.4%

Data source: ACS 2013-2017 5-Year Estimates

Median and Fair Market Rent

HUD estimates median rents and Fair Market Rent for all Fair Market Rent Areas, including Charles Mix County. Median rents are used to calculate Fair Market Rents, which determine payment standards for the Housing Choice Voucher Program (Section 8). HUD estimates Fair Market Rent at the 40th percentile of gross rents for typical rental units offered in a local housing market.⁵ Median and Fair Market Rent estimates can be used to estimate current housing costs for renters. In Charles Mix County, which includes the Yankton Reservation, HUD estimates show that Fair Market Rent for efficiency rentals to four-bedroom rentals range from \$474 to \$1,011 (see Table 7).

⁵The FMR Standard, HUD. <https://www.huduser.gov/Periodicals/ushmc/winter98/summary-2.html>

Table 7 | Estimated fair market and median rents in Charles Mix County

	Efficiency	One Bedroom	Two Bedrooms	Three Bedrooms	Four Bedrooms
Median Rent	\$474	\$537	\$710	\$890	\$1,011
Fair Market Rent	\$467	\$529	\$700	\$877	\$997

Data Source: HUD 50th Percentile Rent Estimates and Fair Market Rent Estimates, 2019

Projected Population Growth

ACS estimates from 2017 and 2010 were used to predict the anticipated population growth rate on the Yankton Reservation. In 2017, the estimated population was 6,676. This is an increase of 2.644% from 2010, or an average annual population growth rate of 0.378%. Assuming a similar rate of growth, it is expected that the current 2019 population has already increased by an additional 51 people since the 2017 ACS estimates, and that the population will increase by an additional 442 individuals over the next 15 years (see Table 8).

Table 8 | Yankton Reservation projected population growth

Year	Population	Growth since 2017 ACS
2017 (ACS 5-Year Estimate)	6,676	-
2019 (2 Years of Population Growth since ACS)	6,727	51
2022 (7 Years of Population Growth since ACS)	6,855	179
2027 (12 Years of Population Growth since ACS)	6,985	309
2032 (17 Years of Population Growth since ACS)	7,118	442

Anticipated Housing Need

Given an estimated population growth of 442 people over the next 15 years, in order to meet additional housing need (maintaining the current estimated ratio of 2.59 persons per housing unit), a minimum of 171 additional units will need to be constructed or rehabilitated in the next 15 years (see Table 9). Vacant units cannot be included in this analysis because the inhabitability of the vacant units is unknown. However, transitioning some vacant units, currently estimated at 476 units, into safely occupied units could help alleviate some of the projected housing strain.

Table 9 | Estimated additional units needed

Year	Estimated Units
2019	20
2022	69
2027	119
2032	171

Income and Employment

In 2017, the median U.S. annual household income was \$57,652, while the median annual household income for residents of the Yankton Reservation was \$40,871. Given the lower median income, it is not surprising that the percentage of the population living under the poverty level on the reservation is much higher than percentages in South Dakota or the U.S. (see Table 10). The percentage of AIAN individuals living below poverty level on the Yankton Reservation is almost twice the percentage of AIAN individuals in poverty in the U.S. Regardless, income is estimated to have increased since 1990. Median estimated annual household income from the 1990 Census, adjusted to 2017 dollars, was \$30,151.⁸

Table 10 | Percentage of population below poverty level in the last 12 months

	Yankton Reservation	South Dakota	United States
All Races (AIAN included)	27.3%	13.9%	14.6%
AIAN alone	49.5%	49.3%	26.8%

Data source: ACS 2013-2017 5-Year Estimates

According to ACS 2017 5-year estimates, the Yankton Reservation has a higher rate of unemployment (7.3%) and a lower employment/population ratio (51.2%) compared to both South Dakota and the United States (see Table 11). The unemployment rate, which does not include those who have not looked for work in over one month, is approximately two times higher than that of South Dakota. The Bureau of Indian Affairs' (BIA) most recent Population and Labor Force Report estimated that, in 2013, less than half (45.6%) of the AIAN population on the Yankton Reservation over 16 years old was employed in civilian jobs⁶. Major employers include the Yankton Sioux Tribe, which encompasses the tribally-owned and operated Fort Randall Casino and Hotel, Indian Health Services, the Bureau of Indian Affairs, and the Marty Indian School.⁷

Table 11 | Employment status of population age 16 or older

	Yankton Reservation	South Dakota	United States
Labor Force Participation Rate	55.4%	68.7%	63.4%
Employment/Population Ratio	51.2%	65.8%	58.9%
Unemployment Rate	7.3%	3.7%	6.6%

Data source: ACS 2013-2017 5-Year Estimates

⁶ 2013 American Indian Population and Labor Force Report. U.S. Department of the Interior, January 2014

⁷ Yankton Sioux Tribe. <https://www.travelsouthdakota.com/about-south-dakota/history-heritage/sd-tribes-plains-indians/sioux-tribes/yankton-sioux-tribe>

⁸ Bureau of Labor Statistics CPI Inflation Calculator https://www.bls.gov/data/inflation_calculator.htm

Regional Employment Projections

The South Dakota Department of Labor (DOL) makes economic projections at the sub-state level. Table 12 shows the long-term industry projections for all sectors for the period 2014-2024 in Central South Dakota, which includes Charles Mix County and the Yankton Reservation. DOL expects the highest percent changes in employment in the wholesale trade (11.0%); manufacturing (9.6%); and transportation and warehousing (8.1%) industries. SD DOL expects negative percent changes in employment in the utilities (-3.9%); arts, entertainment, and recreation (-1.8%); educational services (-1.4%); information (-2.2%); and real estate rental and leasing (-1.8%) industries. The DOL projects a positive 2.96% change in employment from 2014 to 2024 in Central South Dakota, which is less growth than is expected in Eastern South Dakota (5.76%) and Western South Dakota (3.67%).⁹

Table 12 | Industry projections for all sectors in Central South Dakota in 2014-2022

Industry	2024 Projected Employment	Total 2014-2024 Employment Change	Annual Percent Change	Total Percent Change
Total, All Industries	45,121	1,299	0.29%	2.96%
Accommodation and Food Services	2,939	113	0.39%	4.00%
Administrative and Support and Waste Management and Remediation Services	378	17	0.46%	4.71%
Agriculture, Forestry, Fishing and Hunting	8,041	121	0.15%	1.53%
Arts, Entertainment, and Recreation	277	-5	-0.18%	-1.77%
Construction	1,222	38	0.32%	3.21%
Educational Services	3,257	-46	-0.14%	-1.39%
Finance and Insurance	1,547	61	0.40%	4.11%
Government	7,227	118	0.16%	1.66%
Health Care and Social Assistance	4,781	221	0.47%	4.85%
Information	439	-10	-0.23%	-2.23%
Management of Companies and Enterprises	Confidential	Confidential	Confidential	Confidential
Manufacturing	1,774	155	0.92%	9.57%
Mining, Quarrying, and Oil and Gas Extraction	Confidential	Confidential	Confidential	Confidential
Other Services (except Public Administration)	1,730	17	0.10%	0.99%
Professional, Scientific, and Technical Services	1,009	39	0.40%	4.02%

⁹ Labor Market Information Center, SD Department of Labor & Regulation https://dlr.sd.gov/lmic/menu_projections_industry.aspx

Table 12 cont'd | Industry projections for all sectors in Central South Dakota in 2014-2022

Industry	2024 Projected Employment	Total 2014-2024 Employment Change	Annual Percent Change	Total Percent Change
Real Estate and Rental and Leasing	215	-4	-0.18%	-1.83%
Retail Trade	4,173	103	0.25%	2.53%
Total Self-Employed and Unpaid Family Workers, Primary Job	Confidential	Confidential	Confidential	Confidential
Transportation and Warehousing	924	69	0.78%	8.07%
Utilities	197	-8	-0.40%	-3.90%
Wholesale Trade	2,618	260	1.05%	11.03%

Data source: Labor Market Information Center, South Dakota Department of Labor & Regulation



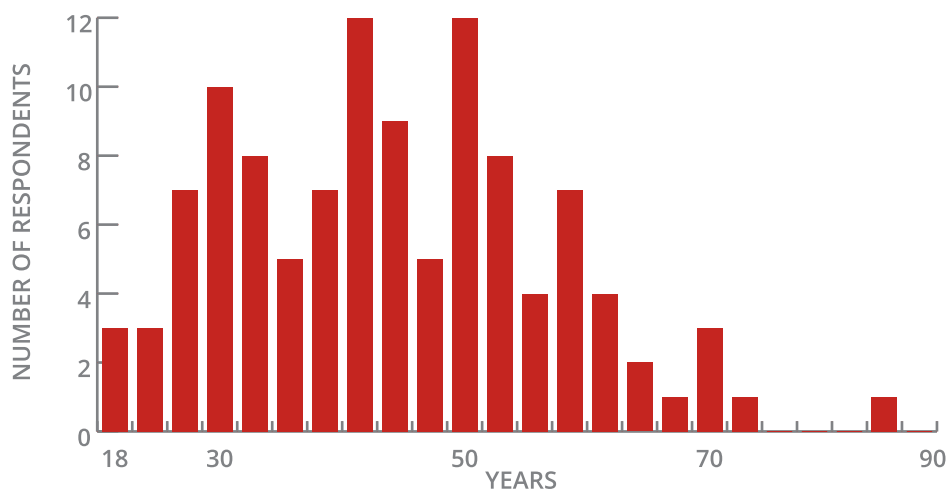
Key Findings: Intercept Survey

A summary of selected results from the intercept survey is presented in the following sections. For detailed summary statistics of each survey question, please see Appendix C. Where appropriate, results are reported for each target population; however, in some cases (veterans, for example), the number of respondents in the target populations was very small, which limits the utility of separate results, even for illustrative purposes. Results were generally similar across target populations. The totals presented reflect the total number of responses for that question; not all respondents answered every question.

Basic Demographics

A total of 112 respondents from nine different communities completed the survey. Respondents' ages ranged from 18 to 86 years old (see Figure 2), with a median of 43 years old. Two-thirds of respondents were female, and 93.7% were enrolled members of the Yankton Sioux Tribe. 62% of respondents were single (never married, divorced, or widowed) and 38% of respondents were married or living with a partner. 8.4% of respondents were veterans.

Figure 2 | Age distribution of respondents



Employment, Income, and General Finances

Employment

Over half of all respondents (53.6%) had permanent full-time jobs, but 21.8% reported being unemployed. Nearly half (48.2%) of all respondents or their spouses worked for a tribal entity (44.6% were tribal employees themselves). Of the 41 respondents who were either married or

living with a partner, 14.6% reported that both parties were unemployed and 22.0% reported that both were employed at permanent full-time jobs.

Income and Expenses

The average annual family income for all respondents was \$25,974 and the median family income was \$27,040. Families of respondents who were employed by tribal entities had higher mean and median annual family incomes (\$37,420 and \$35,000, respectively). Average monthly family spending for all surveyed families (including rent, utilities, groceries, debt payment, and other monthly payments) was \$1,206; median monthly family spending was \$800.

Retirement

Most respondents (81.7%) planned to retire in more than 10 years. Among tribal employees, this number decreased to 75.0%. Among the 23 respondents over 55 years old, only 27.8% planned to retire in over 10 years. However, 77.3% of those over 55 did not have a retirement plan or account. The proportions were similar for tribal employees (78.8%) and respondents overall (80.0%).

Banking

The use of common banking services was somewhat limited among survey respondents. Only 51.4% of respondents had individual checking accounts and only 61.3% of respondents had individual savings accounts. Access to banking services increased somewhat when partners were considered. 60.4% of respondents had an individual checking account, their partner had a checking account, or they had a joint checking account with a partner. 73.0% of respondents had an individual checking account, had a partner with a savings account, or had a joint savings account with a partner.

Debt and Credit

The average level of debt for surveyed families was \$15,508 and the median debt was \$5,000. Families with tribal employees had a higher mean and median debt (\$20,801 and \$10,000, respectively). 68.7% of tribal employees had two or more payroll deductions per pay period (see Table 13). Those over 55 years old lived in families with lower mean and median levels of debt (\$12,662 and \$5,000, respectively).

Table 13 | Number of payroll deductions per pay period for tribal employees

Response	Number	Percentage
0	15	29.4
1	1	2
2	11	21.6
3 or more	24	47.1
Total	51	100

More than two-thirds (68.3%) of respondents had taken out a loan of some kind within the last five years. Of these respondents, 18.8% had defaulted on one or more loans. Among the 44.9% of respondents who had taken out a car loan in the past five years, 66.7% stated that their car loan was reported to a credit bureau.

Credit was an issue for many respondents. A large proportion (42.7%) self-reported a poor credit score and approximately 10% were uncertain of their score. A very small proportion (3.6%) reported an excellent credit score.

Current Housing Situation

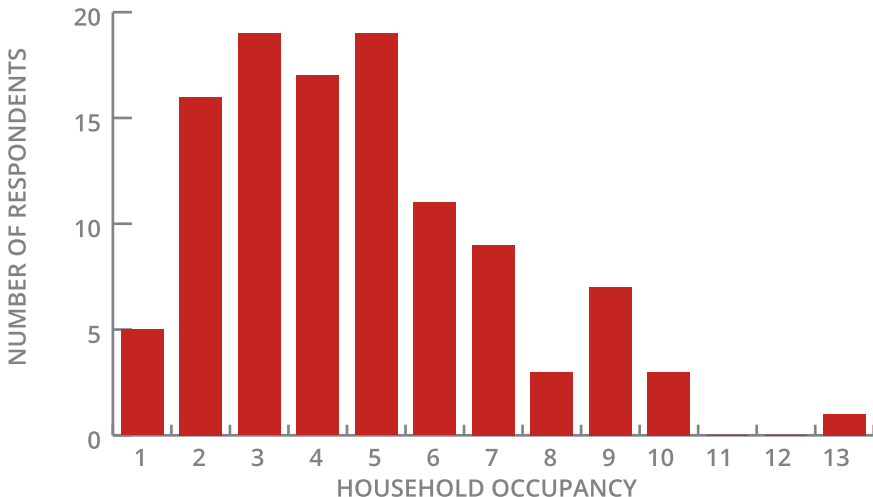
Housing Unit and Ownership

More than half of respondents rented their units, either on their own (54.6%) or together with family or friends (1.9%). Almost a quarter (22.3%) owned their housing units. However, many respondents lived with family or friends on either a temporary or permanent basis and did not pay any rent (16.7%), potentially indicating an unstable “doubled-up” situation. A majority of respondents (57.6%) lived in traditionally constructed single family homes, whether the housing unit was rented or owned. Another 17.4% lived in modular homes. A small proportion of respondents were unhoused and lived in shelters, motels, outdoors, or in a vehicle (1.9%).

Household Size

The average household size was 4.7 people, and the median household size was 4 people. See Figure 3 for the distribution of the household size.

Figure 3 | Household size



Housing Payments

Among those who rented, the average monthly rental payment was \$288 and the median monthly rental payment was \$250. Homeowners had higher monthly housing payments,

with a mean monthly mortgage payment of \$564 and a median monthly mortgage payment of \$552. The median ratio of rent to family incomes was 18.6% for all respondents, 8.5% for families of tribal employees, and 14.8% for respondents over 55 years old.

Preferred Housing Situation

Additional Units

Approximately 40% of respondents acknowledged that at least one person living in their unit would prefer to be living separately in their own unit. Of households interested in additional units, 35.7% wanted one additional unit, 35.7% wanted two additional units and 28.6% wanted three or more additional units. Among the 42 respondent households containing people who wanted their own separate housing units, a total of 89 additional housing units were desired, indicating a housing shortage.

Household Size

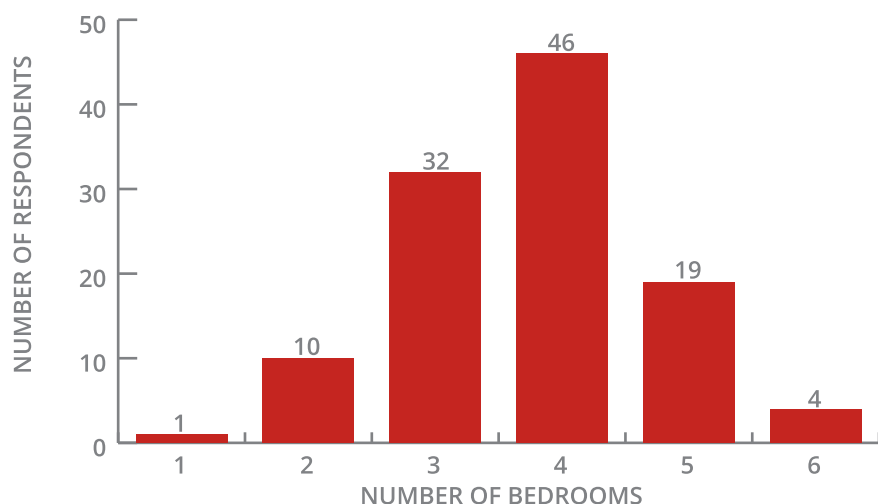
When asked how many people would live together if the respondent were to purchase a new home, the median anticipated household size was 4 people. A vast majority (85.9%) of these households would have one or more children. Tribal employees reported larger anticipated households, with a median of 5 people. Perhaps not surprisingly, those over 55 years old expected smaller household sizes, with a median household size of 3 people.

Unit Type and Features

About three-quarters of respondents (75.7%) wanted to live in single-family homes. Most respondents expressed a preference for single-family traditional construction (stick-built) homes (60.7%), but some (15.0%) expressed a preference for single-family modular homes.

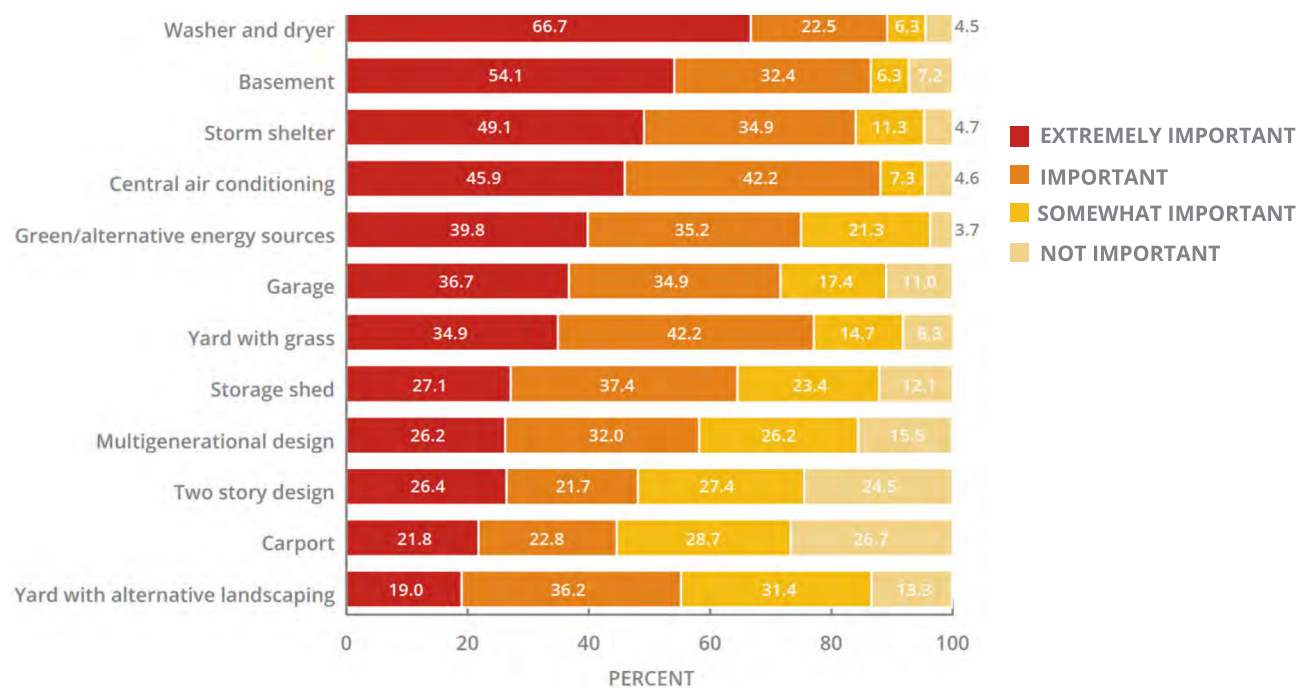
A majority of respondents wanted three or four bedrooms in a new home (see Figure 4). Additionally, most survey respondents preferred a house with two bathrooms (75.9%).

Figure 4 | Desired number of bedrooms in a new home



About two-thirds (66.7%) of those surveyed rated having a washer or dryer as “extremely important.” Other features that respondents most frequently rated as being extremely important to them included basements, storm shelters, central air conditioning, and green/alternative energy sources (see Figure 5). More than one-third of those surveyed (35.5%) also indicated they needed a home with handicap accessible features (a ramp, grab bars, wide hallways, etc.).

Figure 5 | Desired home features by importance



Homeownership

Motivation

All survey respondents were interested in homeownership. The top reasons for their interest included stability (31.9%) and a desire to live in a better house (28.7%). A majority of those surveyed (77.5%) were interested in buying a home in a new Yankton Sioux Housing Development. Tribal employees had a similar level of interest to the overall surveyed population with 75.0% interested in living in a new YST development, but those above 55 years old reported a lower level of interest (59.1%). Top reasons which would motivate respondents to purchase a home in a new Yankton Sioux development included safety (56.1%), the financial benefits of owning a home (53.3%), the ability to design the home (36.4%) and flexible home plans (30.8%).

Affordability

The median amount respondents reported that they could afford to pay for their monthly mortgage payment was \$336, with a range of \$0 - \$1,200. Tribal employees reported a similar

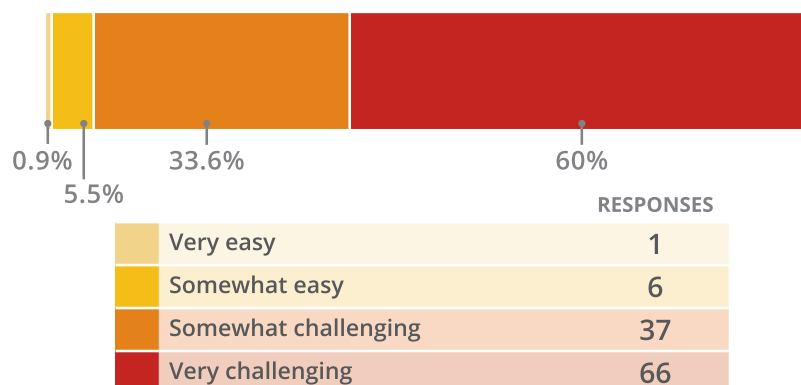
median affordable monthly mortgage payment of \$320, while respondents older than 55 reported a slightly lower median affordable monthly mortgage of \$300. Of the 66 respondents who provided both their family's annual income and an estimate of what they could afford for a monthly mortgage, 49 (or 74.2%) reported a monthly mortgage payment of less than 30% of their family's income, the threshold that HUD uses to establish burden.

Homeownership Barriers and Services

Lack of Available Housing

Almost all (93.6%) survey respondents indicated that it is “somewhat challenging” or “very challenging” to buy affordable, quality housing on the Yankton Reservation (see Figure 6). Similarly, high proportions of respondents reported that if they needed to rent a home today, there would be no options (51.4%) or only 1-2 options (41.4%) available to them. Additionally, 65.3% of respondents reported that they live in their current house because it was the “only choice” that they had at the time they were looking.

Figure 6 | Perceived ease of finding affordable, quality housing to buy on the Yankton Reservation

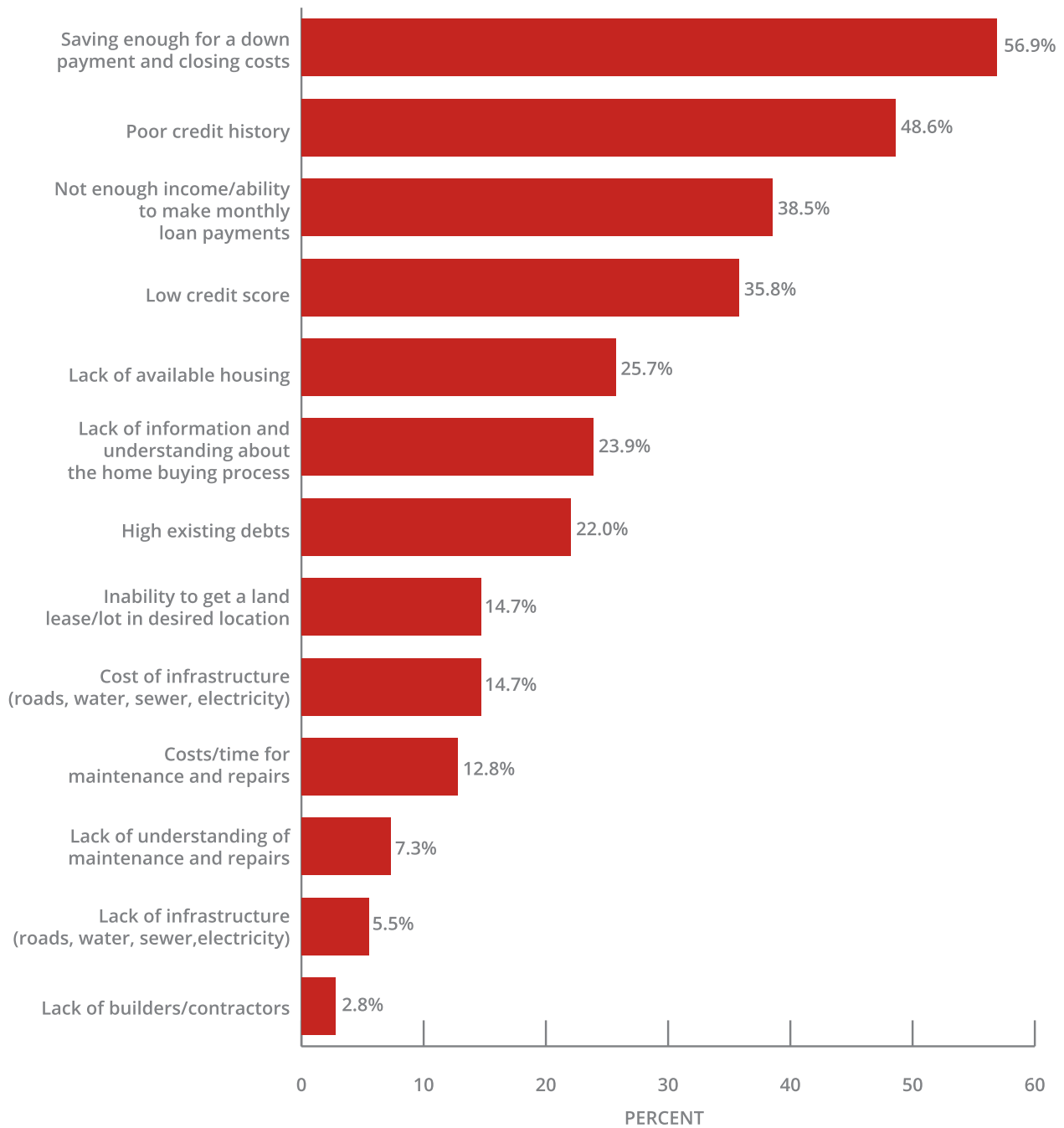


Financial Barriers

While availability was also seen as a barrier, the most commonly cited challenges to homeownership included financial barriers such as saving enough for a down payment, poor credit history, not enough income and a low credit score (see Figure 7). Over two-thirds of respondents (69.8%) thought it would be very difficult or somewhat difficult to get a mortgage.

Lack of familiarity with the financing process might also be a barrier. When asked about home loans and interest rates, 43.6% of respondents were “uncertain” as to what a reasonable interest rate for a home loan should be and about one-quarter of participants (25.5%) considered a reasonable interest rate to be between 0% and 2%. Less than 30% of respondents considered either 3-5% or 6-9% as reasonable rates (21.8% and 7.3%, respectively).

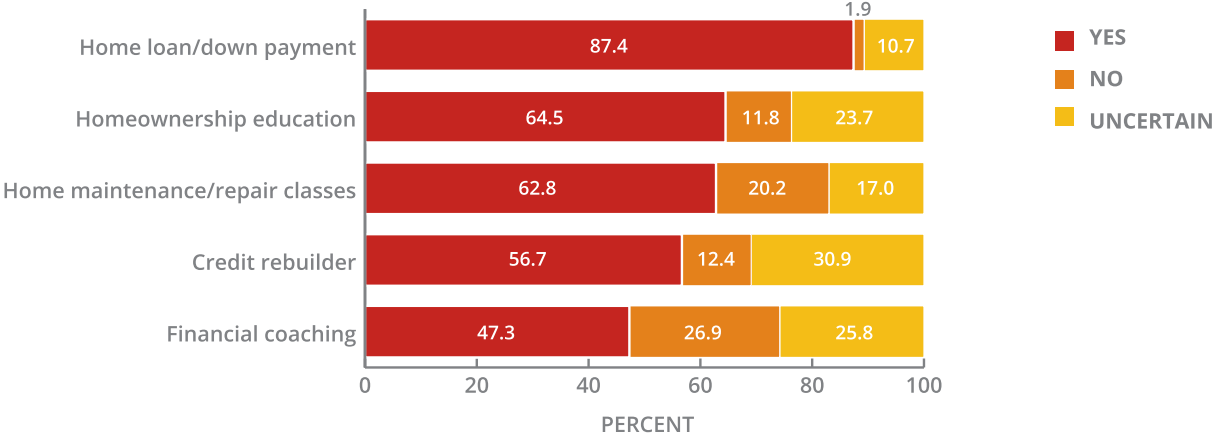
Figure 7 | Top reported homeownership barriers



Services

When asked about services that would help them towards homeownership, respondents expressed the most interest in home loan/down payment assistance (see Figure 8). It is worth noting, however, that between 10% and 30% of the respondents were uncertain about listed services, which could indicate an overall lack of knowledge about the homeownership process or services available. Credit rebuilder programs had the highest reported levels of uncertainty.

Figure 8 | Services needed in support of homeownership



Key Findings: Interviews

Several common themes were identified through the interviews which mirror and/or contextualize the results of the intercept survey and the analysis of existing data. These include housing availability, lending challenges, credit challenges, and lack of familiarity with homeownership and lending processes and requirements. A brief summary is provided below.

- There is limited availability of easily-developed land and both fair market and affordable housing on the reservation.
- The “checkerboard” nature of reservation and off-reservation trust lands makes infrastructure development challenging and costly; one interviewee noted that it was not that difficult to get a home site lease, but that many lots don’t have infrastructure and are not easy to set up.
- Remediating housing units impacted by meth is critical to increasing housing availability (this is the main reason why units are boarded up), but there are limitations on funding and reporting mechanisms.
- Multiple interviewees emphasized the value of homeownership; however, one expressed reservations about promoting it too heavily because of the stability, responsibility and education required to successfully own a home.
- Homeownership programs are “just coming alive” on the reservation and encouragement, outreach, and education are critical.
- The steps and costs associated with purchasing or building a home are not well-known by most people living on the reservation; many may also be unfamiliar with maintenance and other responsibilities of homeownership.
- Hook-up costs can come as a surprise and can pose challenges for those purchasing mobile homes or developing home sites; IHS can provide some assistance, but this is not widely known among residents.
- A personal connection with someone who was responsive and walked prospective homeowners through the processes and paperwork was an important factor in successfully purchasing or building a home.
- Several interviewees highlighted the importance of good credit, the challenges related to credit for many on the reservation, and the need for education related to credit and finances.
- Lending and down payment requirements can be a challenge for those living on the reservation; the Tribe and program officers for lenders such as the VA may be able to help individuals overcome these challenges through mechanisms such as direct loans from the Tribe, 50/50 programs, down payment assistance, and emphasizing stable, consistent income over credit scores.
- There are limited lending options for both purchase and repairs on tribal land; USDA 502 loans were recommended where feasible by multiple interviewees.

- Local lenders and homeowners are further impacted by gaps in federal processes and outreach related to the Section 184 program; for example, prolonged delays in BIA's issuance of Title Status Reports has jeopardized loan guarantees provided by HUD.
- Veterans on the reservation might benefit from additional promotion and facilitation of VA lending options like the VA Home Loan and Native American Direct Loan programs.
- One interviewee recommended development of a veterans housing complex where veterans and their families could live together with supportive services; many veterans have stable incomes that would support homeownership.
- USDA, 1st Tribal Lending, the VA Home Loan program, and the South Dakota Housing Development Authority (SDHDA) and were specifically mentioned as resources; SDNHC's role in creating awareness was also highlighted.



Summary of Key Themes

Three main themes were highlighted in each of the study components. First, there is a critical need for additional housing on the Yankton Reservation. The results also reflect financial challenges related to credit and lending. Lastly, there appear to be high levels of uncertainty surrounding the home-buying process and available (or potential) support systems.

Availability. The need to improve the availability of good quality housing on the Yankton Reservation was reflected in all three survey components. Existing Census data and information obtained from interviews show that few new housing units have been constructed in the last two decades. Over three-fourths of existing units are over 30 years old, and these aging units may be in need of significant repair to maintain or improve their quality. Survey respondents and interviewees also noted the lack of available housing. Over two-thirds of survey respondents reported that they lived in their current unit because it was the only choice they had and over 90% of respondents said that it is “somewhat challenging” or “very challenging” to buy affordable, quality housing on the Yankton Reservation.

The housing shortage has also contributed to overcrowding in Yankton households. ACS data estimates that 8.7% of all occupied housing units on the Yankton Reservation are overcrowded, meaning there is 1.01 or more persons per room in the household. This signals a need for additional housing. Survey responses revealed additional need. A substantial portion of respondents (16.7%) lived with family or friends without payment and 40% of respondents reported that at least one member of their household would prefer to live separately in their own unit. As the population grows, overcrowding and unstable housing situations may worsen if additional housing is not constructed or rehabilitated.

Financial Challenges. The financial situation of most study participants would need substantial improvement before taking on the responsibilities of homeownership.

Many survey respondents did not have access to traditional financial tools. About half of survey respondents did not have a checking account and about one-third of respondents did not have a savings account. The lack of access to and familiarity with these more common financial tools may signal challenges in the ability of these respondents to navigate the financial process of becoming a homeowner.

There was a high level of debt among respondents and over two-thirds of respondents who were tribal employees had two or more payroll deductions per period. The payments on existing loans could hinder the ability of those interested in homeownership to take on additional mortgage debt and monthly mortgage payments.

The credit of respondents may also need significant repair before they could qualify for a home loan. Many respondents had their loans reported to a credit bureau, which likely had a negative impact on their credit score. Over two-thirds of respondents rated their credit score as poor or fair.

Survey respondents were aware that their financial situations created a number of barriers to becoming homeowners. The top barriers to homeownership cited by survey respondents were all financial, including saving enough for a down payment and closing costs (56.9%), poor credit history (48.6%), not enough income/ability to make monthly loan payments (38.5%) and low credit score (35.8%). Interviewees reiterated challenges associated with poor credit and down payments.

Uncertainty and Unfamiliarity. Respondents also expressed a high level of unfamiliarity with the home buying process. Over two-thirds of respondents thought it would be very difficult or somewhat difficult to get a mortgage. Another 20% of respondents were uncertain about how difficult it would be to get a mortgage. Almost half (43.6%) of respondents were uncertain about what a reasonable interest rate for a home loan should be and another quarter of respondents expected that an interest rate between 0% and 2% was reasonable. Many respondents may need education on how to obtain a home loan and what their expectations should be regarding the mortgage terms.

Survey respondents may have unrealistic expectations of the monthly housing payments that come with a mortgage. Surveyed renters paid a median of \$250 a month on rent, which is much lower than the fair market rent prices estimated by HUD, which range from \$467 for an efficiency unit to \$997 for a four-bedroom. Current renters may need additional preparation to understand the expected monthly costs of a standard mortgage, given that their current payments are lower. Across all respondents, the estimates of an affordable mortgage were slightly higher, with a median of \$336.

Despite the demonstrated need for financial assistance and education related to the homeownership process, there is a high level of uncertainty regarding assistance programs. Over a quarter of respondents were uncertain if they wanted financial coaching, and another quarter of respondents did not want any financial coaching. Almost a third of respondents were uncertain if they wanted credit rebuilder assistance and almost a quarter of respondents were uncertain if they wanted homeownership education. These types of programs could provide a great deal of support on the path to homeownership, and the lack of interest in or understanding these programs should be examined further. Interviewees emphasized the lack of familiarity, the need for education surrounding homeownership and financing requirements and processes, and the importance of personal connections and one-on-one support in successfully navigating bureaucracy.

Recommendations

Based on the findings outlined above, Big Water makes the following policy and program recommendations:

Housing

- Increase the available housing stock by rehabilitating vacant homes and building new housing units.
- Explore options to clearly document meth issues and costs in formal documents like the Indian Housing Plan; consider gathering a regional working group to explore and share options to pay for testing and remediation.
- Leverage data on overcrowding, income, ownership and occupancy, as well as respondents' stated preferences and needs, to inform development planning and support grant applications.
- Explore how potential homeowners define "safety" and what community features or amenities would satisfy their definition; include these features in the design of new construction and rehabilitated units.
- Include energy efficiency features in the design of new construction and rehabilitated units.
- Consider convening a group of potential homeowners to contribute to the design of a set of flexible home plans for new construction.
- Explore the feasibility of a program that facilitates the purchase of larger family home sites that could support multiple housing units.
- Consider completing unit condition assessments of current housing stock to better characterize, plan for and prioritize repairs, and support grant applications for new development and rehabilitation.

Homeownership Services

- Support the new CDFI in efforts to get certified to conduct homebuyer readiness and financial literacy classes and work with YSHA and the CDFI to develop, promote, and implement a comprehensive homeownership preparation program that provides financial literacy, credit repair and coaching, homeownership education, and homebuyer assistance and counseling.
- Conduct home maintenance and repair courses to train future homeowners on how to maintain the quality and condition of their homes after purchase.
- Consider dedicating tribal resources to helping potential homeowners navigate the bureaucracy and paperwork associated with buying a home.
- Build on the fairs held in the past and convene homeownership forums that include successful home purchasers and lenders/individuals who have shown a dedication to helping those on tribal lands achieve homeownership in order to encourage personal relationships, advocacy, and mentorship.

- Work with the tribe and local lenders to further develop contextually appropriate home loan and down payment assistance options.
- Work with lenders to explore the feasibility of altering the weighting of income and credit in lending formulas, particularly in the case of veterans with consistent income such as VA Disability Compensation.
- Advocate with BIA, HUD, and local lenders to streamline the lending process, decrease service gaps and risk, and facilitate homeownership on reservation and trust land.

Financial Services

- Conduct systematic outreach regarding available financial services and their purpose and value, including checking and savings accounts, retirement plans, credit repair and financial coaching.
- Require electronic deposit of staff payroll as a means of ensuring that tribal employees have a business relationship with a bank and the services they offer.
- Work with local banks and lenders to ensure that loans are reported to credit agencies to build the credit history of reservation residents.
- Develop and distribute materials explaining the damaging consequences of short-term/ payday loans and loans for depreciating assets such as cars and consumer electronics.
- Collaborate with local lenders to create micro-credit opportunities for potential homeowners to begin developing a credit history or to allow others to repair their credit.





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