

[NCUIH Submits Comments to HUD on Strategic Plan Focus Areas Urging Support for All Native Communities](#)

Category: Policy Blog

written by NCUIH | February 2, 2022

NCUIH urges incorporation of urban AI/ANs and UIOs into focus areas and eventually the FY22-26 Strategic Plan

On January 28, 2022, the National Council of Urban Indian Health (NCUIH) submitted written comments to the Department of Housing and Urban Development (HUD) in response to its invitation for feedback on its draft FY22-26 Strategic Plan focus areas. NCUIH stated its strong support for the proposed focus areas: support underserved communities, ensure access to and increase the production of affordable housing, promote homeownership, and advance sustainable communities. NCUIH also affirmed that is heartened by HUD's attention to the housing needs of American Indian and Alaska Native (AI/AN) communities through the inclusion of Tribal governments in the "support for underserved communities" focus area. However, NCUIH also urged HUD to more completely fulfill its trust responsibility to improve the housing conditions and socioeconomic status of tribal members by also incorporating urban AI/ANs and UIOs into its focus areas and, eventually, the FY22-26 Strategic Plan.

The United States has a [general trust responsibility](#) to support AI/AN governments and AI/AN people. This includes a [specific responsibility](#) to "work[] with tribes and their members to improve their housing conditions and socioeconomic status." There is no exception to this trust responsibility for tribal members who no longer live on a reservation or reside in an urban area. Among the efforts the United States will take to make available affordable homes in safe and healthy environments in AI/AN communities is the [provision of housing assistance](#). In its comments, NCUIH noted that despite its trust responsibility the United States does little to provide AI/AN-specific housing services to urban AI/ANs.

NCUIH noted that AI/ANs living in urban areas are [disproportionately disadvantaged economically](#) and face numerous barriers to accessing services and achieving a measure of housing security and stability. NCUIH also observed that urban AI/AN households have [higher rates of cost burden](#), are more likely to live in housing lacking complete plumbing and kitchen facilities, and are more likely to live in overcrowded housing. Further, the AI/AN population is disproportionately represented in the [homeless population nationwide](#) and [experience poverty](#) at a higher rate than the overall population.

NCUIH urged HUD to consider the needs of AI/ANs living in urban areas in its Strategic Plan focus areas and ultimately in the Strategic Plan. By failing to extend its AI/AN-specific services to urban AI/ANs, HUD fails to fulfill its trust responsibility to the [seventy \(70\) percent of AI/ANs who live in](#)

[urban areas](#). UIOs are uniquely positioned to assist HUD in supporting underserved communities, ensuring access to and increasing the production of affordable housing, promoting homeownership, and advancing sustainable communities among AI/AN people. UIOs provide numerous other [social and community services](#) to urban AI/ANs. Providing housing services aligns with UIOs' mission to provide quality, accessible, and culturally competent health and public health services for AI/ANs living in urban settings because [housing is a key social determinant of health](#). HUD has also previously acknowledged the need to [coordinate health, housing, and social welfare services](#). UIOs have the cultural competency and community connections necessary to further support HUD's mission and assist HUD in fulfilling its trust responsibility to urban AI/ANs.

NCUIH will continue to monitor the development of HUD's FY22-26 Strategic Plan. NCUIH will advocate for HUD to incorporate urban AI/ANs and UIOs in the Strategic Plan itself throughout the development process and in future comment opportunities.