



TOHONO O'ODHAM NATION
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"For the People"



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The Tohono O'odham Nation

The Tohono O'odham Nation ("Nation") is a federally recognized tribe in southern Arizona with over 30,000 enrolled members. The Nation's reservation, which consists of four non-contiguous areas located in Pima, Pinal, and Maricopa Counties, encompasses approximately 4500 square miles of a mostly remote Sonoran Desert environment, with 74 miles of international border with Mexico. The political center of the Tohono O'odham Nation, Sells, AZ, where a majority of the governmental services are provided, is located almost 60 miles away from the nearest urban area. Additionally, the Tohono O'odham Nation consists of eleven political subdivisions known as districts, with over 50 distinct communities and villages.

In 2010, the Nation actively participated in efforts to inform the public of the importance of the census and tried to work collaboratively with the Census Bureau staff. As a result of that experience and in continued recognition of the significance of census data, the Nation is taking the opportunity to provide the following written comments to urge better communication, organization, inclusion of tribal members in outreach efforts, and to strongly urge the correction of American Community Survey data.

Tohono O'odham Nation Urges Better Communication and Planning Efforts with Tribes Prior to Census Bureau Visits to Communities

During the 2010 census, the Nation designated the Nation's Department of Planning and Economic Development as the tribe's official liaison with the Census Bureau. The Department informed Census Bureau staff that prior to visiting any of the Nation's districts or communities, the Census Bureau should notify the Department so that the Department could in turn notify the respective tribal leaders of the district or community. Unfortunately, even though the advance notice requirement was clearly communicated, Census Bureau staff did not observe the practice. As a result, the Nation's Department received numerous calls from district leadership and Nation's members inquiring why there were strangers in their communities asking so many personal questions.

When the Nation's Department raised the communities' concerns and objected to the lack of advance notice, the Census Bureau staff stated their particular division had not been informed of the requested practice. Previous to this discussion, the Nation's Department was unaware of the lack of communication between the Census Bureau divisions and that the Nation would need to contact each division to ensure the uniform sharing of important Nation's procedures and practices. Additionally, the Nation's efforts to coordinate any planning efforts with the Census Bureau staff were frustrated by the communication issues between divisions. While the Census Bureau provided the Nation's Department a list of multiple individuals to contact, the Census Bureau did not provide a clear description of which individuals should be contacted for what purpose, delaying attempts to coordinate and organize visits to communities.

Prior to contacting any Nation's members for either the 2020 census or American Community Survey, the Nation strongly urges the Census Bureau staff to improve the communication between divisions, and to closely coordinate and organize projects with the Nation's designated tribal liaison. As a department within the Nation's governmental structure, the Nation's designated liaison will inherently possess far more knowledge about the geographical layout of communities, culturally acceptable practices, and effective strategies to further the implementation of the census.

Noticeable Absence of Tribal Census Team Leaders

In 2010, the Nation observed that the Census Bureau did not appear to hire tribal team leaders. The Nation strongly urges the Census Bureau to work collaboratively with the Nation's tribal liaison to identify qualified and knowledgeable individuals who will competently guide a Census Bureau team through the different Nation's districts and communities. One of the previous suggestions raised with the Census Bureau was to hire a representative from each district or community. This arrangement would benefit both the Census Bureau and Nation's members.

Nation Strongly Urges 50% Oversampling to Correct Issues with American Community Survey

American Community Survey data is used in numerous ways, but one in particular is negatively affecting large, land-based tribes such as the Tohono O'odham Nation. Indian Housing Block Grant funds are a primary resource for many tribes to offer low-income, affordable housing options to tribal members. Recently, American Community Survey data was included as part of the formula for the allocation of Indian Housing Block Grant funds, and unfortunately, the Nation faces a severe reduction in funds based upon American Community Survey information.

Potential issues with the American Community Survey data collection methods are negatively affecting the Tohono O'odham Nation and its members. As an example, the U.S. Department of Housing and Urban Development estimated that the Tohono O'odham Nation, as recently as last year, had over 1500 homes that were considered overcrowded. However, the most recent American Community Survey data released at the end of 2015 now reports that overcrowding on the Nation has decreased to just over 400 homes. The only explanation for this drastic change in overcrowding numbers is sampling error. Most recently, at Tribal Census Consultation held in Washington, D.C. on March 24, 2016, U.S. Census Bureau Associate Director, Lisa Blumerman acknowledged the issue of under sampling on reservations and that the Census Bureau was moving towards oversampling up to 50% on tribal lands. The Nation strongly supports implementation of the 50% oversampling as a more accurate reflection of the Nation's demographics that should be captured by the American Community Survey.

Sincerely,



Edward D. Manuel, Chairman
Tohono O'odham Nation