

**Attachment A: FY 2025 Indian Housing Block Grant (IHBG) Needs Data  
For the Tonawanda Band of Seneca**

The Needs data which will be used to estimate your Fiscal Year (FY) 2025 Indian Housing Block Grant (IHBG) formula allocation are shown below:

Need Variable	Adjusted 2010 Decennial Census and 2015 to 2019 American Community Survey		Tribe Submitted Census Challenge (if applicable)	
	Single Race	Multi Race	Single Race	Multi Race
American Indian and Alaska Native (AIAN) persons*	524	486		
AIAN households with annual income less than 30% of median income	55	55		
AIAN households with annual income between 30% and 50% of median income	50	50		
AIAN households with annual income between 50% and 80% of median income	40	40		
AIAN households which are overcrowded or without kitchen or plumbing	45	45		
AIAN households with housing cost burden greater than 50% of annual income	10	10		

\* The Decennial Census AIAN population data is adjusted for undercounts on reservation/trust lands and for remote Alaska. It is also adjusted for population change through FY 2019 based on the most recent Census county-level population projections. The count shown is the same has been used since FY 2022, because any further update is dependent on the introduction of the 2020 Decennial Census.

**Note:** The Housing Shortage Needs variable is not shown because it is based on the sum of low-income households less the total number of Current Assisted Stock (CAS), and CAS is not provided on this document for review. However, it has been provided on your Tribe's FY 2024 Formula Response Form.

All of the data above reflects the total Needs for your Formula Area prior to the application of the population cap. Therefore, these figures may be much higher than the amounts shown on your Tribe's Formula Response Form. If you share Formula Area with other Tribes, the data shown are your share of the Needs data in your combined overlapping Formula Areas.

The IHBG regulation at 24 CFR §1000.336(d) requires that Tribes/Tribally Designated Housing Entities (TDHE) submit documentation supporting Census challenges by March 30<sup>th</sup> to be considered for the upcoming fiscal year allocation. The deadline to submit Census challenges to the data used in computing the FY 2025 IHBG formula allocation is March 30, 2024. However, the data was not available to distribute to Tribes/TDHEs until August 30, 2023, 90-days after the June 1, 2023, deadline for distributing this data to Tribes/TDHEs. Therefore, a waiver of this deadline and an extension of the deadline to June 28, 2024, has been approved to provide Tribes/TDHEs with a similar amount of time as they had in prior fiscal years to review their Needs data.

If you think these data do not reflect the Tribe's need:

1. Check to see if the Formula Area, as listed on your FY 2024 Formula Response Form, is correct for your Tribe. If the Formula Area is not correct, you may submit that correction no later than August 1, 2024, the deadline for the FY 2025 allocation.
2. Check to see if the Formula Area for your Tribe overlaps that of another Tribe. If it does, you may wish to contact the IHBG Formula Customer Service Center to obtain detailed information on how the Needs data are being shared.
3. If you still disagree, you may wish to submit a Census challenge no later than June 28, 2024, for the FY 2025 IHBG allocation. If so, please review the guidelines in "Challenging U.S. Census Data: Guidelines for the Indian Housing Block Grant Formula." [https://portal.hud.gov/hudportal/HUD?src=/program\\_offices/public\\_indian\\_housing/ih/codetalk/onap/ihbgformula](https://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/ih/codetalk/onap/ihbgformula).

Should you have questions, please contact the IHBG Formula Customer Service Center at:

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Phone: 800-410-8808  
Fax: 202-393-6411  
E-mail: [IHBGformula@firstpic.org](mailto:IHBGformula@firstpic.org)