



February 1, 2015

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Department of Commerce
Room 6616
14th and Constitution Avenue NW.
Washington, DC 20230

SUBMITTED VIA ELECTRONIC MAIL TO jjessup@doc.gov

Reference: Comment Request: 2015 National Content Test
Document Citation: 79 FR 71377
Document Number: 2014-28247

Dear Ms. Jessup:

On behalf of Cook Inlet Housing Authority (CIHA), I appreciate this opportunity to submit comment on the above referenced notice issued by the Department of Commerce ("the Department"). The Department is seeking comment on information collection related to the U.S. Census Bureau's 2015 National Content Test (NCT).

We believe that the proposed data collection may seek to collect information that will not have practical utility to the Department or the Census Bureau. We are grateful for the opportunity to articulate our concerns and suggest ways to enhance the quality, utility, and clarity of the information to be collected.

Preventing the Exclusion of Alaska Native Tribal Members from Special Tabulations

According to the Census Bureau, the 2015 National Content Test (NCT) is a continuation of ongoing testing activities to research innovative methods for reducing the cost of the 2020 Census, while maintaining a high quality census. The testing helps the Census Bureau develop a census that is cost-effective, improves coverage, and reduces operational risk. The results will inform planning decisions that will guide the design of the 2020 Census.

One of the primary objectives of the 2015 National Content Test is to evaluate and compare different census content, including content related to race. The 2010 Decennial Census asked respondents who self-identified as American Indian or Alaska Native to name their "enrolled or principal tribe." Cook Inlet Housing Authority and many other tribal housing providers in Alaska are deeply concerned that the manner in which this question is asked, if changed, will inadvertently gather information that is of little utility due to its poor quality and lack of clarity.

The tribal status of Alaska Native peoples is unique. Historically, most Alaska Natives identified along ethnic lines as being, for example, Aleut, Tlingit, or Yupik. It was not until the 1970s that the

land claims of Alaska's indigenous peoples were settled, resulting in the creation of regional and village corporations with Alaska Native shareholders. Federal recognition of Alaska tribes did not occur until the 1990s, a process that resulted, in many instances, in tribes being formally recognized on the basis of the proximity of a specific group of people to a particular village or geographic area. Sometimes, those people were not connected by shared ancestry, history, or culture; rather, the manner in which the federal government recognized Alaska's tribes was in some circumstances an artificial construct.

Because of this unique and complex history, members of Alaska tribes may, when asked to identify their tribe, "tribal affiliation," "principally enrolled tribe," or similar tribal status, respond by identifying themselves in a variety of ways. Some may identify the tribe of which they are a member. Some may identify the regional or village corporation of which they are a shareholder. Many will identify in a traditional manner as being, for example, Aleut, Tlingit, or Yupik. Alaska Native elders, for example, often identify ethnically when asked about their "tribe" – even when they are tribal members.

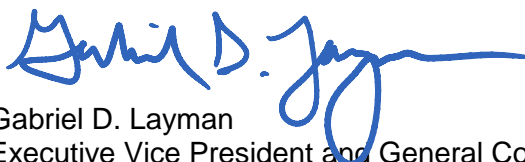
This phenomenon was apparent at a recent Alaska Native forum on tribal issues. An elder in the audience stood to speak, identifying himself as being seventy-one years old. "It makes no sense to me," he explained, "the way that Native people [in Alaska] must identify these days. Is being a shareholder what makes us Native? Being a member of a village? The names of our tribes were just taken from many different places and used for all the people who lived nearby. What happened to being Tlingit? This is how I think of myself."

Recent focus groups held by the Census Bureau at a conference of the Alaska Federation of Natives appeared to confirm that Alaska Natives who are tribal members are at risk of being excluded from special tabulations intended to gather data on tribal enrollment or membership. Despite the fact that Alaska Natives who identify in this manner are usually tribal members or shareholders, there is a significant risk that they may not be counted as tribal members for the purposes of a particular federal program. Were a federal agency to allocate funding, for example, on the basis of the number of respondents who name a federally-recognized tribe in response to a tribal enrollment question, the result would be the misallocation of federal resources based upon flawed data. The harm to Alaska Native tribal members would be significant.

For many years, the United States Census Bureau has responded to the concerns of Alaska Native peoples regarding this issue. Thoughtfully, the Census Bureau recognizes Alaska Natives who primarily identify along ethnic lines (e.g. Haida, Inupiaq, Athabascan, etc.) when asked about their tribal affiliation, preventing a potentially significant undercount of Alaska Native tribal members. This approach must be maintained going forward, and we respectfully request that any data collection through the 2015 National Content Test that deviates from this approach be removed because of its limited utility, low quality, and lack of clarity.

On behalf of Cook Inlet Housing Authority, thank you for the opportunity to comment on the above referenced notice.

Respectfully submitted,



Gabriel D. Layman
Executive Vice President and General Counsel