



Community Economic Development in Indian Country

Market Research Report



BIG WATER
CONSULTING



August 2023

Prepared by: Kevin Klingbeil, Chloe Adler, Amanda Hermans, Harry Maher, Nancy Pindus, and Devoni Whitehead

Community Economic Development in Indian Country: Market Research Report

Prepared for:
New Markets Tax Credit Program Native Initiative
Community Development Financial Institutions Fund (CDFI Fund)
U.S. Department of the Treasury
Washington, D.C.

Prepared by:
Kevin Klingbeil, Chloe Adler, Harry Maher, and Devoni Whitehead
Big Water Consulting

Nancy Pindus and Amanda Hermans
Urban Institute

August 2023

Acknowledgements

The authors wish to thank their colleagues who reviewed this report, providing valuable insights and suggestions: Brett Theodos of Urban Institute, Karen Williams and Roman Bitsuie of Indigenous Development Partners, and Sean Zielenbach of SZ Consulting. Kaytlin Eldred of Big Water Consulting contributed to the literature review and earlier drafts of the report.

We appreciate the contributions of individuals from the organizations listed in Appendix B that spoke with members of the research team, sharing their knowledge as well as additional sources for this report.

We thank Christopher Allison, Rosa Martinez, and David Fleites of the U.S. Department of the Treasury, CDFI Fund for their guidance throughout and, along with their colleagues at the CDFI Fund, for the thorough and thoughtful review they provided.

Table of Contents

Community Economic Development in Indian Country: Market Research Report	1
Acknowledgements	2
Table of Contents	3
List of Figures	6
Executive Summary	7
Foundations of Community Economic Development in Indian Country	7
Essential Components of Community Economic Development	8
Sectors of Community Economic Development	8
Native Actors Promoting Community Economic Development in Indian Country	8
Sources of Funding and Capital for Community Economic Development	9
Community Economic Development Topics Specific to Indian Country	9
Section 1: Introduction and Purpose	12
Section 2: Methods	15
Section 3: Foundations of Community Economic Development in Indian Country	17
Self-Determination and Governance	17
The Rule of Law and Reliable Tribal Bureaucracy	19
Land Management and Jurisdiction	21
Political Stability and Independence	23
Section 4: Essential Components of Community Economic Development	26
Land	26
Location	26
Infrastructure	27
Natural Resources	29
Tribal Workforce	30
Tribal Colleges and Universities	32
Business Development, Credit Access, and Capital Formation	34
Digital Business Capacity	35
Section 5: Sectors of Community Economic Development in Indian Country	37
Natural Resources Processing	37
Natural Gas Extraction	37
Natural Resource Protection and Conservation	38
Manufacturing, Construction, and Utilities	39
Manufacturing	39
Construction	40
Telecommunications Utilities	41
Consumer and Business Services	42
Gaming	42
Hospitality and Tourism	42

Business Services	43
Public Sector, Government, and Community Services	43
Health Care	44
Child Care and Education	45
Section 6: Native Actors Promoting Community Economic Development in Indian Country	46
Community Development Financial Institutions (CDFIs)	46
Community Development Corporations (CDCs)	48
Native Credit Unions and Banks	49
Tribal Economic Development Departments and Chartered Entities	51
Alaska Native Corporations	53
Homestead Associations of Hawaii	54
Tribal Organizations	55
Partnerships and Regional Development Efforts	56
Sovereign Wealth Funds	57
Section 7: Sources of Funding and Capital for Community Economic Development	59
Grants	60
U.S. Department of Housing and Urban Development (HUD)	60
U.S. Department of Agriculture (USDA)	60
U.S. Economic Development Administration (EDA)	61
American Rescue Plan Act (ARPA): Opportunity and Inequitable Funding	62
Loans and Leveraging Sources	62
Federal Loan Guarantee Sources	62
Using Existing Revenue Streams as Loan Collateralization	64
Tax Incentives	64
Programs Incentivizing or Promoting Tribal Community Economic Development	68
Private Capital and Investment	75
Role and Potential of Philanthropy	76
Capital Stacking	79
Section 8: Community Economic Development in Indian Country: Addressing Challenges and Moving Forward	81
Opportunities for Community Economic Development in Indian Country	81
The Need for Better Economic Data Regarding Indian Country	83
The Role of Data Sovereignty	85
Impacts of Data Limitations for Native Communities	86
Recommendations for Future Data Collection	88
Cultural Values and Economic Development	89
Conclusion	90
Glossary	92
Appendix A: Special Circumstances Pertaining to Alaska Native Villages, Oklahoma Tribes,	

Pueblos, and Hawaiian Home Lands	96
Alaska	96
Oklahoma	96
Pueblos and Spanish Land Grants	98
Hawaii	99
Appendix B: Organizations Participating in Information Gathering Discussions	101
Bibliography	103
Annotated Bibliography	127

List of Figures

Table 1 | Summary List of Funding Sources.....67

Executive Summary

This Market Research Report is part of a larger project supporting the Community Development Financial Institution (CDFI) Fund's New Markets Tax Credit (NMTC) Program Native Initiative (NMTC Native Initiative). The project is being conducted for the CDFI Fund by Big Water Consulting and its partners. The NMTC Native Initiative supports efforts by the CDFI Fund to explore opportunities to increase Native NMTC investment in *Federal Indian Reservations, Off-Reservation Trust Lands, Hawaiian Home Lands, and Alaska Native Village Statistical Areas* (NMTC Native Areas) and expand Native communities' access to capital via the tax incentives allocated through the NMTC Program.¹

The purpose of this report is to identify and review existing research and data on the unique history, challenges, industries, actors, and available funding and capital sources that shape how tribes and Native actors successfully participate in community economic development. This Market Research Report reviewed existing literature summarizing the history and current state of community economic development in Native lands in the United States, focusing on the last 10-20 years. Materials reviewed include articles or documents prepared by tribal entities; universities; philanthropic foundations; academic journals; federal, state, and local government or government-sponsored entities; Native membership associations; and Native news organizations.

Below are the highlights of each section of the report, including the foundations, essential components, sectors, actors, and funding sources that are relevant to community economic development in Indian Country, as well as a forward-looking overview of opportunities and challenges.

Foundations of Community Economic Development in Indian Country

Since the 1970s, an era of reemerging self-determination has allowed for the renewed economic independence of tribes and Native communities through the steadily expanding assumption of traditional government functions, including oversight over health care, housing, roads, transportation, courts, and education. The strengthening of tribal capacity and governance practices has allowed for progress in tribal community economic development, including the growth of tribal gaming and other enterprises. Many tribes have established economic goals and are working to achieve parity with neighboring non-Indian communities on a variety of socio-economic indicators, a goal that has already been reached or surpassed by some tribes.

¹ New Markets Tax Credit Native Areas (NMTC Native Areas) are defined to include Federal Indian Reservations, Off-Reservation Trust Lands, Hawaiian Home Lands, and Alaska Native Village Statistical Areas. In addition, this report includes community economic development in Oklahoma Tribal Statistical Areas (OTSA), as well as tribal projects in urban areas and state-recognized American Indian Reservations. The broader term, Native lands, as used in this report, refers to these areas and NMTC Native Areas. The term Indian Country is generally used in the common colloquial sense to mean tribal areas, including Alaska Native villages, and is not used as a legal term in this report. This report moves between these terms, reflecting the sources used.

A foundation of governance must be in place for community economic development efforts in Native lands to be successful. This includes comprehensive and strategic planning, establishing or maintaining a strong rule of law, effective management of tribal lands, and effective balancing of cultural values and community economic development goals.

Tribes and Native communities vary tremendously in terms of their governance history and structure, state or federal recognition, land ownership scale and status, and capacity to take on certain roles and authority. Specific distinctions related to the tribes and Native communities in Oklahoma, Alaska, Pueblos and Spanish land grants, and Hawaii are discussed in Appendix A of the full report.

Essential Components of Community Economic Development

If you are a local or a tribal government pursuing a community economic development strategy, this requires several common elements:

- Suitable and available land;
- Skilled and ready workforce;
- Business development and digital capacity; and
- Capital formation.

However, economic development is complicated by the rural location, limited population density, lower income levels, and inadequate infrastructure of many communities on or near tribal lands.

Sectors of Community Economic Development

Community economic development in Indian Country covers the spectrum of industry sectors, including:

- Natural resources processing;
- Manufacturing;
- Construction;
- Utilities;
- Casinos, hospitality, tourism, and recreation;
- Business services; and
- Public sector, government, and community services.

Gaming operations and natural resources extraction and processing have allowed many tribes and Native communities to develop the financial resources, business acumen, and relationships with external business partners necessary to expand and diversify their community economic development. This has been particularly true for Alaska Native Corporations and tribes closer to urban areas or major transportation corridors.

In recent years, the range of community economic development activities has dramatically expanded in some Native communities, including development of large-scale retail and health care facilities and regional utility and broadband service providers. This is especially true for tribes that can leverage revenue streams from large-scale gaming or natural resources extraction enterprises. Other tribes and Native communities that have been unable to leverage their location or natural resources have faced a much more challenging path to community economic development.

Native Actors Promoting Community Economic Development in Indian Country

The growth in the scale and range of community economic development activities is largely a product of the varied Native entities deftly capitalizing on favorable federal contracting provisions, opportunities for partnering with Native and non-Native entities to serve regional markets, newly available capital, and an array of sector-specific grants and tax incentives targeting underserved and disadvantaged areas. These actors include:

- Tribal enterprises;
- Native-owned businesses;
- Tribal departments and chartered tribal entities;
- State licensed Community Development Corporations (CDCs);
- CDFI Fund-certified Native Community Development Financial Institutions (CDFIs); and
- Community Development Entities (CDEs) that are Native owned or controlled.

Deep and broad community economic development within individual Native communities often depends on the parallel, orchestrated efforts of numerous entities working in concert with one another to maximize opportunities available to small, medium, and large-scale projects across various sectors.

Growth in regional and national Native economic development-focused organizations, such as the Native American Finance Officers Association (NAFOA), National Center for American Indian Enterprise Development (NCAIED), and Native CDFI Network, that promote sharing of information and collective advocacy, has helped elevate tribal businesses and economic development entities throughout the country. Additionally, enhanced coordination with other tribes, nearby non-Native communities, and state and regional entities has allowed tribal

communities of all sizes to develop economies of scale and a critical mass of technical and financial resources to develop a broader spectrum of mutually beneficial facilities.

Sources of Funding and Capital for Community Economic Development

Native organizations are accessing an expanding array of funding sources, including state and federal loans and grants, available private and tribal capital, and tax incentives in order to increase community economic development on Native lands. The ability to use and combine different funding and financing sources largely depends on the scale and purpose of the project in question as well as the tribe or Native community's ability to leverage its own available tribal capital or general funds and revenue streams.

Tribal community economic development is increasingly layered in terms of the range of different Native-owned businesses, tribal enterprises, and financial institutions working in coordination to attract new sources of capital to support an array of ventures. These organizations are becoming more adept at leveraging or stacking multiple sources to fund projects at various cost levels to support small businesses, community facilities, large retail centers, and regional service providers.

Community Economic Development Topics Specific to Indian Country

This report aims to increase knowledge and understanding of community economic development strategies in Indian Country. To continue moving forward, economic actors within and outside of Indian Country need to hold a shared understanding of the increased opportunities that exist in Indian Country, the limitations posed by the need for more data, and the importance of respecting cultural values.

Opportunities exist for enhanced community economic development in Indian Country.

Although challenges remain, the community economic development capacities of tribal and other Native communities have improved over time, and tribal governments and enterprises are well-positioned to pursue new opportunities for growth. There are projects waiting to be done in Native communities in various stages of planning, approvals, and obtaining funding. Opportunities lie in the growth of tribal enterprises and jobs in the sectors of natural resources extraction, manufacturing, construction, hospitality, and public sector projects such as health facilities and community centers. Native American CDFIs (Native CDFIs) and other financial entities serving Indian Country continue to search for ways to meet a growing demand for credit and capital, which will only continue to increase as Native economies and tribal capacities grow. Many regional and national Native organizations argue that the issue of community economic development in Native lands is now less dependent on capacity-building than on adequate and equitable access to financing and capital. These organizations posit that the focus should be on developing grant and financing criteria that more fairly incorporate the unique circumstances of Native communities

into application selection criteria, as well as the creation of a set of tribal and Native set-asides to ensure tribal participation in certain programs.²

The need for improved data underlies many limitations to community economic development in Indian Country.

There are glaring gaps in the available data necessary to support community economic development in Native lands, resulting from both a lack of relevant or accurate data being collected, and restricted access to the data that do exist. Accurate federal, tribal, and other data describing Native lands is not only necessary for supporting internal community economic development planning efforts, but it is also essential for allowing lenders and investors to assess the opportunities and risks associated with bringing their capital to Native lands. This lack of critical data continues to hinder the attraction of capital to Indian Country, though several tribes, Native organizations, and local, state, and federal agencies are actively working to improve existing data sources and to create new ones.

Data sovereignty, a component of the overarching sovereignty possessed by Indian tribes, refers to the right of indigenous people and nations to govern the collection, ownership, and application of their own data.³ As tribes continue to more fully express and implement data sovereignty, tribes and Native communities are more actively participating in the design and monitoring stages of data collection projects within their lands. They are also developing strong partnerships with other tribal and non-tribal organizations at state, regional, and national levels to produce much-needed accurate tribal data sets, while retaining tribal ownership and control over the use of the data collected. To improve and fill in the gaps in relevant data, a comprehensive evaluation of available data sources should be conducted. This evaluation should address the issues of data relevance, accuracy, and precision.

Understanding of and respect for cultural values is essential for future community economic development in Indian Country.

While tribal governments work towards economic growth, they are also focused on preserving tribal culture, identity, sovereignty, population, and land, creating a unique balance of priorities that is distinct from other rural communities. All components of community economic development in Indian Country are also considered through a cultural lens by tribal actors, helping to explain some of the economic decisions made by tribal governments. For example, many tribes might make an active choice to avoid developing or exploiting their natural resources, such as minerals, water, or forests, for economic gain. While natural resources are a common economic resource for most rural areas, land itself, in its unspoiled state, often holds

² “Lawmakers Call for Expanded NMTC Access for Native Communities,” *Tax Notes*, September 28, 2020, <https://www.taxnotes.com/research/federal/legislative-documents/congressional-tax-correspondence/lawmakers-call-for-expanded-nmtc-access-for-native-communities/2d088>.

³ Alex Tamaro, “Native Data Sovereignty Can Address Data Gaps and Improve Equity,” *Urban Wire*, Urban Institute, June 13, 2022, <https://www.urban.org/urban-wire/native-data-sovereignty-can-address-data-gaps-and-improve-equity>.

significant historical, cultural, and spiritual meaning for tribes. Therefore, the appropriate choice for a tribe might be to preserve the land rather than develop its resources for economic growth. Tribes might also decide to invest resources into acquiring more land, especially land of historic significance, rather than investing in other economic ventures.

Those interested in partnering on projects in Indian Country can benefit from enhanced cultural understanding. When surveyed, Native American nonprofit leaders stressed the desire for funders and foundations to have already conducted background research before establishing relationships, so that connections are cultivated based on deepened understanding of the specific community.⁴ Outreach to Native tribes needs to be consistent and thorough while acknowledging the wide range of perspectives, unique experiences, and complexities of each tribe and community.

⁴ Ellie Buteau, Hannah Martin, and Katarina Malmgren, “Overlooked (Part Two): Foundation Support for Native American Leaders and Communities,” Center for Effective Philanthropy, 2021, http://cep.org/wp-content/uploads/2021/07/CEP_Overlooked_Native_American.pdf.

Section 1: Introduction and Purpose

This Market Research Report is part of a larger project supporting the CDFI Fund's New Markets Tax Credit (NMTC) Program Native Initiative. The New Markets Tax Credit Native Initiative project is being conducted for the CDFI Fund by Big Water Consulting and its partners. The NMTC Native Initiative supports efforts by the CDFI Fund to explore opportunities to increase NMTC investment in *Federal Indian Reservations*, *Off-Reservation Trust Lands*, *Hawaiian Home Lands*, and *Alaska Native Village Statistical Areas* (NMTC Native Areas) and expand Native communities' access to capital via the tax incentives allocated through the NMTC Program.⁵ The NMTC Native Initiative incorporates several core components, including:

- This Market Research Report, which reports on successfully implemented community economic development strategies that resulted in attracting capital to Native communities and challenges that Native entities face in accessing capital for community economic development;
- Technical assistance workshops informing representatives of Native organizations about the purposes and mechanics of the NMTC program;
- Analysis of NMTC investment data describing the investments and activities of tribes and Native organizations in the NMTC program;
- Case studies exploring past NMTC projects that may provide replicable models for future projects; and
- A self-assessment guide for tribal entities that seek to participate in the NMTC Program describing the various roles and the corresponding responsibilities related to the NMTC.

The purpose of this report is to identify and review existing research and data on tribes that have successfully implemented community economic development strategies, focusing on NMTC Native Areas and other Native lands over the last 10-20 years. The intended audience for this report includes:

- The U.S. Department of the Treasury;
- Congress;
- Tribal and other Native leaders;
- Economic development entities operating within Native lands;

⁵ New Market Tax Credit Native Areas (NMTC Native Areas) include Federal Indian Reservations, Off-Reservation Trust Lands, Hawaiian Home Lands, and Alaskan Native Village Statistical Areas. In addition, this report includes community economic development in Oklahoma tribal statistical areas (OTSA), as well as tribal projects in urban areas and state-recognized American Indian Reservations. The broader term, Native lands, as used in this report, refers to these areas and NMTC Native Areas. The term Indian Country is generally used in the common colloquial sense to mean tribal areas, including Alaska Native villages, and is not used as a legal term in this report. This report moves between these terms, reflecting the source used. More complete definitions of these terms and others can be found in the Glossary.

- Local, state and federal agency staff involved in community economic development promotion or regulation;
- Non-Native entities involved in or interested in economic development activities in Native lands; and
- Others who are simply seeking to better understand the challenges of and opportunities for community economic development in Native lands in the United States.

To serve these varied audiences, this report provides a broad view of community economic development in Native lands. Community economic development refers to a combination or integration of community development and economic development processes. Community development aims to make a community a better place to live and work by building community assets and institutions. Economic development focuses on the creation of wealth and economic opportunities. Community economic development recognizes that the two processes are interrelated—economic development is not possible without a solid community foundation, and communities need economic opportunities to thrive.⁶

The report synthesizes information that will help you understand the unique context for community economic development in Native lands, including the types of projects that are underway, as well as challenges, opportunities, and successful strategies. This may be particularly interesting if you are interested in pursuing community economic development in Native lands as new enterprises, participants, partners, or investors.

No summary of community economic development in Native lands would be thorough or accurate if it did not address the actors, programs, and sources of funding and capital involved in catalyzing community economic development. But this report also considers the unique historical, cultural, geographic, and land-related contexts that shape community economic development activities in Native lands. As a result, each of the community economic development projects, initiatives, and programs described in this report are evaluated with the understanding that, in addition to traditional market forces and principles that drive decision-making, community economic development decisions within Native lands have an accompanying cultural overlay that may reshape, constrain, or even defeat projects or initiatives that may otherwise be viewed as economically sound.

The next section of this report, Section 2, describes the methodology we used to compile this information. Section 3, Foundations of Community Economic Development in Indian Country, includes a discussion of self-determination and governance, the rule of law and reliable tribal bureaucracy, land management and jurisdiction, and political stability and independence. All tribes and Native communities are unique in their land and governance structures pertinent to community economic development, but some groups face special circumstances not covered in Section 3. Appendix A is included to describe special circumstances pertaining to Alaska Native

⁶ Rhonda Phillips and Robert H. Pittman, eds, *An Introduction to Community Development*, (New York: Routledge 2009), Chapter 1.

Villages, Oklahoma tribes, pueblos and Spanish land grants, and Hawaiian Home Lands. Section 4, Essential Components of Community Economic Development, describes the elements that any local or tribal government pursuing a community economic development strategy needs: suitable land available for the intended purpose of economic development; a skilled and ready workforce; and business development and capital formation capacity. Section 5, Sectors of Economic Development, provides examples of the economic activities underway in Indian Country, including natural resource processing; manufacturing, construction and utilities; consumer and business services; and public sector, government, and community services. Section 6 describes the Native actors promoting economic development in Indian Country. Section 7 describes sources of funding and capital for community economic development. Section 8, Community Economic Development in Indian Country: Addressing Challenges and Moving Forward, concludes with a forward-looking summary of both the challenges and opportunities facing community economic development in Indian Country. It especially describes data limitations in Native communities, as well as the importance of respecting cultural values for future success.

Section 2: Methods

This section covers the methods used to conduct research and review of the current state of community economic development in Native lands in the United States.

The foundation of this Market Research Report is a review of existing literature summarizing the history and current state of community economic development in Native lands in the United States. Materials reviewed for this report include:

- Peer reviewed and sponsored studies, such as articles or documents prepared by tribal entities;
- Universities;
- Philanthropic foundations;
- Academic journals;
- Federal, state, and local government or government-sponsored entities;
- Native membership associations; and
- Native news organizations.⁷

While we focused on identifying and incorporating materials that addressed community economic development in Native lands within the past 10-20 years, many of the challenges, opportunities, and models described in recently published materials were and are affected by laws, policies, programs, and funding mechanisms that long preceded them. To account for this, we occasionally drew from materials or reference events that fell outside of this period. This approach accounts for the slow evolution and relatively recent emergence of community economic development activities driven by sovereign tribal governments and Native communities on Native lands.

To guide the research that would inform this report, we first prepared an annotated bibliography of known resources from prior research that concerned community economic development in Indian Country, as well as relevant materials that were recently published or shared online by a variety of tribal and federal government, nonprofit, industry, and academic actors. We shared this bibliography with staff of the CDFI Fund to ensure that the materials were relevant, comprehensive, and appropriate. This step also provided the CDFI Fund staff with the opportunity to share any relevant materials compiled during the course of their work. We further targeted specific sectors, programs, funding sources, and model projects and activities to provide greater context for and specific examples of the themes found throughout the initial list of materials.

⁷ A government-sponsored entity, also known as a government-sponsored enterprise (GSE) is a quasi-governmental, privately held agency established by Congress to improve credit flow in some regions of the United States' economy. GSEs provide financial services to the public for various things, particularly mortgages, through capital market liquidity. GSEs help to facilitate borrowing for a variety of individuals, including students, farmers, and homeowners.

Many initiatives unfolding within Native lands are not summarized in traditional published academic journals or newspapers. Additional resources included materials that may have only been distributed internally, shared at conferences, or prepared for specific uses such as advocacy, congressional testimony, or inter-organizational collaboration.

To provide a more complete view and identify additional resources, we conducted conversations with individuals knowledgeable about the complexity of community economic development in Native lands. In preparation for these conversations, we developed an initial list of potential participants based on a list of organizations and contact persons provided to the team by the CDFI Fund. The lists included points of contact from:

- Native CDEs and Native CDFIs serving NMTC Native Areas;
- Non-Native CDEs that have made NMTC investments in NMTC Native Areas; and
- Staff members of federal agencies and national Native organizations that focus on community economic development in Native lands, including:
 - Native American Finance Officers Association (NAFOA)
 - Native CDFI Network
 - National Congress of American Indians (NCAI)
 - Federal Reserve Bank of Minneapolis' Center for Indian Country Development

We shared this list with staff of the CDFI Fund to ensure that the individuals and organizations included were relevant, representative, and appropriate. We developed a short list of standard questions concerning relevant materials and topics to provide structure and consistency for each conversation. The conversations were relatively limited in scope and length (30-60 minutes). Not all of the individuals who received a request responded or agreed to participate in a conversation with the research team. We conducted a total of 18 interviews over a 7-week period. Appendix B lists the organizations that participated in interviews.

These conversations unearthed new examples and model activities, while also allowing subject matter experts to address and contextualize the layering of challenges and opportunities for community economic development that are summarized in published materials. The conversations triggered further research and shaped our interpretation of topics that received only cursory treatment by other sources.

A list of all referenced materials accompanies this report and contains the full citations for the materials summarized in the report. An annotated bibliography with more extensive summaries of selected referenced materials is included as an addendum. This will allow you to further explore the focus and findings of these source materials.

Section 3: Foundations of Community Economic Development in Indian Country

This section provides brief context for the events that led to the economic marginalization of Native communities and how these communities have been prioritizing economic development in recent decades.

Community economic development aims to create conditions that allow for both short- and long-term sustainability of an area and considers both physical and social infrastructure. In Native communities, community economic development activities, such as accessing resources and setting economic priorities, come with unique cultural and historical context. Considerations of self-determination, governance, the rule of law, land management and jurisdiction, the political landscape, population retention, and cultural values are all important.

Self-Determination and Governance

The arc of Native community economic development in the United States resembles a swinging pendulum. European colonization of the Americas and the subsequent wars and United States policies resulted in the loss of tribal land and population, the disruption of tribal economies, and an increased tribal dependency on the federal government. Native economies that had been successful and sustainable before colonization became “reservation economies that were cut off from significant aboriginal lands and resources,” and were oftentimes dependent on failed federal programs.⁸ As a result, Native tribes and communities have long suffered from economic marginalization and a lack of opportunity. Unemployment and family poverty rates for American Indians remain higher than for the general U.S. population, while per capita income and labor force participation are lower, according to 5-year estimates (2011-2015) of American Community Survey data.⁹

In recent decades, strengthened tribal capacity and governance has allowed tribes to make progress in community economic development. The continued implementation of the federal policy of self-determination has given tribes more opportunities to administer their own programming and has allowed for the growth of tribal gaming and other enterprises. Many tribes have established economic priorities and are working to achieve parity with neighboring non-Native communities on a variety of socio-economic indicators. This goal of parity has already been reached or exceeded by some tribes, while many others are making significant strides.¹⁰

⁸ Dick G. Winchell, “Indigenous Rural Renewal in the Inland Pacific Northwest: The Emergence of American Indian Tribes in Regional Economic Development,” *Journal of Rural and Community Development* 8, no. 3 (2013): 175, <https://journals.brandonu.ca/jrcd/article/view/1036/253>.

⁹ Randall Akee, “Sovereignty and Improved Economic Outcomes for American Indians: Building on the Gains Made Since 1990,” *Washington Center for Equitable Growth*, January 14, 2021, <https://equitablegrowth.org/sovereignty-and-improved-economic-outcomes-for-american-indians-building-on-the-gains-made-since-1990>.

¹⁰ Winchell, “Indigenous Rural Renewal.”

Tribal sovereignty is one of the critical elements that has made it possible for tribes and Native communities to engage more extensively in community economic development. The law of tribal sovereignty has developed in the federal courts and by federal statutes, executive orders and treaties over the last two centuries, and now rests on several fairly well-settled tenets:

1. Tribes have virtually unlimited authority over internal tribal affairs;
2. Tribes are subject to the plenary, or absolute, power that Congress has over them;
3. Tribes are presumptively immune from state law;
4. Tribes cannot be sued absent their express consent or a waiver of their immunity; and
5. Tribal sovereign immunity does not extend to individual tribal members except to the extent that tribal officials act within the scope of their official capacities.¹¹

While the unique, and in many cases, treaty-affirmed, status of tribes as sovereign nations within the United States has always implied some level of legal self-determination tribes in the U.S. have only recently been able to practically take advantage of their status as sovereign entities. Despite the sovereign status of tribes, some land allotment and settlement strategies were designed to weaken or nullify traditional tribal governments by giving land ownership to individuals through fee simple titles instead of preserving more traditional communal land management practices. American Indians living on reservations were not granted citizenship until the Snyder Act in 1924, and other federal policies throughout the mid-twentieth century sought to weaken tribal power by drawing American Indian populations into urban areas and, in some cases, ending their federal recognition in exchange for cash settlements.¹²

With the passage of the Indian Self-Determination and Education Assistance Act in 1975, federal policy toward American Indian tribes shifted toward self-determination, giving tribes more power over the programs and resources available to them. Tribes and Native communities primarily used two common approaches to community economic development in this era: the standard approach and the nation-building approach.¹³ The standard approach, which is characterized by external control, a short timeline, and a lack of big-picture strategy, has dominated tribal economic development for years. But the nation-building approach, which centers sovereignty, has been a more successful and sustainable strategy. The nation-building approach puts practical decision-making power in the hands of Indian nations and prioritizes effective governing institutions and strategic thinking. This approach to development starts not

¹¹ Sue Woodrow, "Tribal sovereign immunity: An obstacle for non-Indians doing business in Indian Country?" *Federal Reserve Bank of Minneapolis*, July 1, 1998, <https://www.minneapolisfed.org/article/1998/tribal-sovereign-immunity-an-obstacle-for-nonindians-doing-business-in-indian-country>.

¹² Akee, "Sovereignty and Improved Economic Outcomes."

¹³ Stephen Cornell and Joseph P. Kalt, "Two Approaches to Economic Development on American Indian Reservations: One Works, the Other Doesn't," (2006): 2, https://www.honigman.com/media/site_files/111_imgimgjopna_2005-02_Approaches.pdf.

with “what can be funded?” but with “what kind of society are we trying to build?” and pursues funding or economic opportunities from there.¹⁴

Strategic and comprehensive planning enables sustainable economic development in Indian Country. Comprehensive planning focuses on what can be done with the resources already on hand—such as land or natural resources—while strategic planning takes a larger view that includes attracting new capital investment. Careful development and adoption of both types of plans through strong grassroots participatory processes can pave the way for long-term, consistent decision-making. Ted Jojola, an indigenous planning expert, notes that initial successes with enterprises like gaming can make it easier for tribes to begin strategically planning because profits from existing enterprises can be reinvested in an “economic development strategy with the intent of diversifying outside of their own limited resource base.”¹⁵

This shift to self-determination and nation-building strategies has proven essential in promoting economic development for many tribes. Many tribes have taken three specific steps to create an environment where community economic development and entrepreneurialism can flourish:

1. Emphasizing the rule of law;
2. Separating politics from day-to-day administration and business; and
3. Creating efficient and reliable tribal bureaucracy.¹⁶

Despite the progress that has been made in these areas, there is still more work to be done in many tribal and Native communities to build a capacity capable of handling large economic development investments. We discuss some challenges and recommendations regarding these three capacity-building elements below.

The Rule of Law and Reliable Tribal Bureaucracy

By taking steps such as establishing and enforcing property rights and methods for resolving disputes, tribal governments can establish a strong rule of law laying out clear rules of community economic development for all actors. This predictability and stability clarifies expectations and encourages confidence for private business investment.

Tribes seeking to promote economic development should have a bureaucracy that enables economic activity. Clear and timely permitting processes and dispute resolution mechanisms are just some of the ways that efficient and well-framed bureaucracy can encourage business

¹⁴ Cornell and Kalt, “Two Approaches,” 17.

¹⁵ Ted Jojola, “Indigenous Planning—An Emerging Context,” *Canadian Journal of Urban Research* 17, no. 1 (2008): 44, https://www.uwinnipeg.ca/ius/docs/cjur/37-47_Jojola.pdf.

¹⁶ Pettit et al., “Continuity and Change: Demographic, Socioeconomic, and Housing Conditions of American Indians and Alaska Natives,” U.S. Department of Housing and Urban Development Office of Policy Development and Research. 2014. 37, https://www.huduser.gov/portal/publications/commdevl/housing_conditions.html.

development.¹⁷ Native community members, Native entrepreneurs, tribal enterprises, and tribes themselves will have greater success as borrowers if tribal legal infrastructure signals that contracts will be honored, loans will be repaid, transactions will progress smoothly, and decision-making is transparent.¹⁸ The adoption of Uniform Commercial Codes is one example of how tribes have sought to encourage investment and lending. These codes establish clear rules governing secured transactions between creditors and debtors that facilitate the flow of credit.¹⁹

Streamlining tribal bureaucracy can be complicated by the fact that tribal members and their lands are often at least partially subject to multiple legal jurisdictions. While many tribes in the United States are considered sovereign nations, their lands still sit within a state and county. Because most tribal land is held in trust by the federal government for the benefit of tribes and individual tribal members (discussed in detail below), often both federal and tribal officials have—sometimes conflicting—authority over these lands. In addition, in some limited cases states also have legal or tax authority over tribes or their enterprises.²⁰ This can make for a confusing mix of authority when it comes to community economic development.

To help enterprises and investors navigate this unique system, tribes should take care to make their own rules and regulations clear and clarify any state and local authority, or lack thereof, to regulate or tax specific activities through negotiation or litigation. When concurrent jurisdiction issues occur, tribes might use their community economic development plans to outline which lands are subject to concurrent, tribal, or non-tribal jurisdiction. If possible, tribal governments should create collaboration agreements with other jurisdictions that have authority within tribal areas, setting standards so that the timing of decisions is more predictable for developers. Some tribes have established specific agreements with states or counties regarding the collaborative exercise of jurisdiction. For example, the Tulalip Tribes have a tax sharing compact with the State of Washington.²¹

Sudden changes to the legal landscape or unclear legal or jurisdictional authority can put community economic development at risk. Many Native communities grappled with this issue following the passage of Public Law 280 (PL 280) in 1953. In response to what was considered “weak law enforcement apparatus” on reservations, PL 280 transferred jurisdictional authority over criminal and civil matters in Indian Country to the states.²² This created concurrent jurisdiction of state and tribal authorities in tribal areas, which in many cases was confusing and ambiguous. It reduced tribal budgets while not providing any additional resources to states for

¹⁷ Stephen Cornell, “What Makes First Nations Enterprises Successful?” 12-13

¹⁸ “Access to Capital and Credit in Native Communities,” Native Nations Institute, 2016, 73, http://nni.arizona.edu/application/files/8214/6378/9056/Access_to_Capital_and_Credit_in_Native_Communities.pdf

¹⁹ Susan Woodrow, “Uniform Commercial Codes: Bringing Business to Indian Country. Tribal Secured Transactions Laws: A Working Forum,” Presentation, 2013, retrieved on September 8, 2022 from https://www.bia.gov/sites/default/files/dup/assets/as-ia/ieed/pdf/idc1-024558_508.pdf.

²⁰ Lofthouse, “Institutions and Economic Development,” 237.

²¹ “Tax Sharing Compact Between The Tulalip Tribe and the State of Washington,” 2020, <https://www.hca.wa.gov/assets/program/tax-sharing-compact-tulalip-tribes-of-wa-and-wa-state.pdf>.

²² Valentina Dimitrova-Grajzl, Peter Grajzl, A. Joseph Guse, “Jurisdiction, Crime, and Development: The Impact of Public Law 280 in Indian Country,” *Law & Society Review* 49, no. 1 (2014).

enforcement. As Dimitrova-Grajzl, et al. put it, “PL 280, on the one hand, eroded the powers of the local community to deal with crime and social problems and, on the other hand, provided enough ambiguity for authorities not to deal effectively with enforcement on reservations.”²³

In the last decades of the twentieth century, the push for self-determination brought with it the rise of tribally controlled law enforcement agencies. There are currently over 250 tribal law enforcement agencies, most of which are administered fully by tribes under contract with the Bureau of Indian Affairs (BIA)’s Division of Law Enforcement Services.²⁴ Officers and other law enforcement employees are most often tribal employees. Complementing the authority of tribal police agencies is the tribal court system. In 2014, about 234 tribal courts served federally recognized tribes in the lower 48 states, 77% of which exercised both civil and criminal jurisdiction. Approximately 80% of these tribal courts served 9,999 or fewer residents.²⁵

Tribal authority over tribal issues plays a vital role in establishing stability and safety in tribal areas. According to Wakeling, et al., only those tribes that have acquired meaningful control over their governing institutions have experienced improvements in local economic and social conditions, and research has not found “a single case of sustained economic development where the tribe is not in the driver’s seat.”²⁶ Laws that protect people and property, effective law enforcement, and stable and reliable courts support community economic development by reducing risk or the perception of risk to investors. Few people would want to invest their money in places that cannot or will not protect their resources and interests, or where that protection is uncertain.

Land Management and Jurisdiction

The management of tribal lands is a key function of tribal governments. Historical, political, and cultural forces have resulted in unique legal and regulatory circumstances governing tribal lands in the United States.²⁷ Through the federal trust system, the federal government is the legal owner and guardian of about 95% of the land in Indian Country—it holds about 56.2 million acres in trust for American Indian tribes or individuals.²⁸ Tribal lands placed into trust have been acquired by the secretary of the U.S. Department of the Interior (DOI), who then holds the titles

²³ Ibid.

²⁴ “Tribal Law Enforcement,” Bureau of Justice Statistics, accessed September 6, 2022, <https://bjs.ojp.gov/topics/tribal-crime-and-justice/tribal-law-enforcement>.

²⁵ Steven W. Perry, Michael B. Field, and Amy D. Lauger, “Tribal Courts in the United States, 2014 – Statistical Tables,” Bureau of Justice Statistics, July 2021, https://bjs.ojp.gov/sites/g/files/xyckuh236/files/media/document/tcus14st_0.pdf.

²⁶ Stewart Wakeling, Miriam Jorgensen, Susan Michaelson, Manley Begay, “Policing on American Indian Reservations,” U.S. Department of Justice, July 2001, <https://www.ojp.gov/pdffiles1/nij/188095.pdf>.

²⁷ This section pertains specifically to tribal lands in the lower 48 United States. Certain areas in those states, as well as Alaska Native villages, and Hawaiian Home Lands operate under different legal and regulatory circumstances, described later in this section.

²⁸ Lofthouse, “Institutions and Economic Development,” 232-235.

for the benefit of a Native American tribe or individual tribal members.²⁹ There are two types of trust land:

- Tribal trust lands, which are held by the federal government on behalf of tribal governments, and
- Allotted trust lands, which are held by the federal government on behalf of individual tribal members.

Because allotted trust lands are held in trust for individual allottees and their descendants, trust parcels are often passed down to multiple descendants and are then owned by more than one owner as undivided interests.³⁰ This often results in fractionated land ownership, which can limit owners' ability to develop the land, because development decisions need the agreement of the owner(s) of a majority interest. There is some precedent for consolidating these fractionalized interests: As a part of the settlement of *Cobell v. Salazar* in 2009, the Land Buy-Back Program for Tribal Nations offered limited opportunities for willing sellers to sell their fractionalized interests in trust or restricted land at a fair market value to the established \$1.9 billion Trust Land Consolidation Fund. The newly consolidated interests were then restored to tribal trust ownership for uses that would benefit the reservation community and tribal members. The Land Buy-Back Program allowed for the consolidation of more than 800,000 interests, equivalent to 2.3 million acres across 50 locations in 15 states. But the program ended in 2022, curtailing its potential for future impact.³¹

While trust lands make up most tribal lands, reservations also frequently contain fee simple lands, or lands that are owned outright by individual tribal members, the tribe, or another owner, rather than being held in trust. Fee simple lands are subject to county and state jurisdiction unless they are purchased by the tribe and placed into trust with the federal government.³² Different reservations have different mixes of land under these various systems of land tenure.

Although the trust system was designed to prevent further loss of Native lands, it complicates private property rights—an important tenet of U.S. market participation—for tribes and tribal members. Tribes and some tribal members lack the ability to use their homes or land as

²⁹ “Benefits of Trust Land Acquisition (Fee to Trust),” Department of the Interior, accessed April 27, 2023, <https://www.bia.gov/service/trust-land-acquisition/benefits-trust-land-acquisition>.

³⁰ David Listokin, Kenneth Temkin, Nancy Pindus, David Stanek, “Mortgage lending on tribal land: A Report from the Assessment of American Indian, Alaska Native, and Native Hawaiian Housing needs,” U.S. Department of Housing and Urban Development, 2017, <https://www.huduser.gov/portal/publications/NAHSC-Lending.html>.

³¹ “Land Buy-Back Program for Tribal Nations: About,” U.S. Department of the Interior, accessed January 10, 2023, <https://www.doi.gov/buybackprogram/about>.

³² Rachel Kramer et al., “Assessment of the Housing Needs of American Indians, Alaska Natives and Native Hawaiians in Washington State,” Big Water Consulting for Washington State Dept. of Commerce, 2021, <https://www.commerce.wa.gov/about-us/reports-publications>.

collateral, since they are not the legal owners of that land.³³ This can constrain or even prevent the development or purchase of new homes, since potential homeowners may be unable to get loans. Homes on trust land also tend to be severely undervalued, as the market itself is stifled. These two factors constrain homeownership in Native communities, which is a significant tool for building intergenerational wealth. Economist Jordan K. Lofthouse concludes that the “land trust impedes market participation and skews economic calculation,” presenting a continued challenge for Native community economic development.³⁴

Some tribes have found creative ways to circumvent the limitations of trust land using the Helping Expedite and Advance Responsible Tribal Home Ownership Act (HEARTH Act) of 2012. For example, according to Lofthouse, “some tribal governments have begun using leasehold mortgages and long-term lease income as collateral on loans.”³⁵ The HEARTH Act is a voluntary program administered by the Department of the Interior that offers tribes a more efficient land leasing process with less Bureau of Indian Affairs oversight. Tribes that have approved leasing regulations under the Act can significantly reduce the time it takes to execute and approve leases, which can encourage potential lessees to invest and develop in tribal communities. HEARTH Act leasing regulations can apply to residential, business, and agricultural leases, as well as leasing for public, religious, educational, or recreational purposes. The BIA maintains a list of all tribes with HEARTH Act authorization by year and type: As of 2022, 77 unique tribes have had tribal leasing regulations approved by the Secretary of the Interior.³⁶ Among these, 72 leasing regulations apply to the leasing of land for business purposes.

While many tribes have not developed their own land leasing regulations under the HEARTH Act, the Ho-Chunk Nation provides an example of a successful use of the law to speed up land leasing and unlock capital. Prior to the approval of the Ho-Chunk Nation’s land leasing regulations by the BIA, it took up to 18 months for the lease processing; but after 2016, when the Ho-Chunk Nation’s Ho-Chunk Realty Division was established, the time to acquire a lease was reduced to four to six weeks.³⁷ This more streamlined process can encourage business investment by reducing wait times, removing uncertainty in leasing processes, and allowing the tribe to provide longer leases to business entities. It can also help to attract larger job-generators, such as manufacturing plants, which must obtain site control and frequently borrow

³³ Carla F. Fredericks and Kate R Finn, “Harnessing Private Equity for Indigenous Peoples. Boulder, CO: First Peoples Worldwide,” University of Colorado, Boulder, 2020, https://www.colorado.edu/program/fpw/sites/default/files/attached-files/harnessing_private_equity_for_indigenous_peoples_-_final.pdf.

³⁴ Lofthouse, “Institutions and Economic Development,” 243.

³⁵ Lofthouse, “Institutions and Economic Development,” 234.

³⁶ “Approved Hearth Act Regulations,” Bureau of Indian Affairs, accessed September 2, 2022, <https://www.bia.gov/service/HEARTH-Act/approved-regulations>.

³⁷ Patrice H. Kunesh, “Case Study: HEARTH Act Implementation,” Essay, in *Tribal Leaders Handbook on Homeownership*, 88–92, Minneapolis, MN: Federal Reserve Bank of Minneapolis – Center for Indian Country Development, 2018.

predevelopment capital to perform preliminary construction design and bidding, site investigations such as environmental and geotechnical investigations, and to pursue construction financing. If lease approvals take a year or more, the holding costs for predevelopment capital and the risk of non-approval become severe impediments. The delays and leasing complexities of typical trust lands can make them noncompetitive for businesses that can otherwise locate outside of Native lands without encountering these problems. But by leveraging HEARTH Act authority, tribes can streamline access to capital through leasehold mortgages in an important step for bringing non-tribal capital to their area.

Political Stability and Independence

After the Indian Reorganization Act (IRA) of 1934 allowed tribes to adopt their own constitutions, various forms of political and governance structures emerged across Indian Country. Many tribes have modeled their constitutions after the federal system with three distinct branches of government, but others have developed theocracies, parliamentary systems, and other government structures.³⁸ These various systems have different implications for tribal economic activity.

The differences in governance among tribes and other Native communities create challenges for non-Native capital providers and businesses because the knowledge and experience obtained by working with one tribe is not necessarily applicable to another tribe. Working with Alaska Native Corporations and Villages and Native Hawaiian communities also involves different sets of policies and procedures. Some tribal governments have institutionalized lease terms (see discussion of the HEARTH Act above). Others have developed processes for preparing and approving limited waivers of sovereign immunity and the related approvals and contract provisions and implemented environmental regulations, historical and archaeological reviews, systems development or impact charges, tribal taxes, and other regulatory mechanisms. It is vital for tribes to provide clear and reliable explanations of the issues relevant to their operations for non-Native partners, because they can help quantify timelines and establish standards for approvals. While the substance of the decision-making criteria may reflect tribal values and needs—and therefore be different from a nearby non-tribal government’s substantive regulations—clarity and consistency will allow non-Native tribal partners to predict and price their risk.

As with any jurisdiction, the political and economic realms of tribal affairs are likely to be closely tied. Constituents elect leaders who promise to respond to their desire for good jobs and other economic opportunities, and those leaders in turn pursue initiatives to spur economic growth. But having these two realms too closely tied together can impede economic development. Especially in systems where elections are involved, it is important to maintain a separation between politics and economic activity.

³⁸ Lofthouse, “Institutions and Economic Development.”

Cornell notes that empowering business managers to make decisions free from political considerations can make for stronger business practices.³⁹ While tribal governments may have a role to play in creating the big picture goals for a tribe's economic development, the day-to-day management should be free from the sway of politics. A long-term strategic plan that has received community approval may help to promote stability and protect implementation from political influence.⁴⁰

Cornell also suggests having a board of directors that oversees a Native-owned enterprise or collection of enterprises to help manage the politics-business connection. Such boards can introduce diverse expertise into upper-level decision-making and help protect the enterprise from political interference. Cornell further suggests board member terms that are longer than council terms, requiring two-thirds council approval to remove a board member, and allowing boards to appoint members themselves, with council approval, to maintain the balance between independence and accountability.⁴¹

However, a clean separation of economic development and politics is not in keeping with the governance models of some tribes. Many tribes are participatory democracies that actively encourage or require consensus through deliberation at the local level. These systems are built on historical tradition and continue to be practiced today.⁴² And while separating politics and economic development is one strategy for creating economic stability, political stability in itself can also help encourage community economic development activity. A political system that is predictable and reliable makes investment less risky, as the economic landscape will not be subject to upheaval with each election season. Alternatively, long-serving politicians who are not subject to short term limits might provide consistency and can focus on long-term economic development goals and projects, rather than just the projects that will help advance their electoral platforms in the next cycle.

In summary, regulatory consistency and transparency on the part of tribal governments, federal policies that recognize sovereignty and facilitate efficiencies in development processes, and a recognition of Indian Country's diverse historical, cultural, and political context are all necessary components to fostering community economic development in Native lands.

³⁹ Stephen Cornell, "What Makes First Nations Enterprises Successful? Lessons from the Harvard Project," *Joint Occasional Papers on Native Affairs*, 2006.

⁴⁰ Denny Hurtado, "From the Rebuilding Native Nations Course Series: 'The Importance of Strategic Planning,'" Native Nations Institute for Leadership, Management, and Policy, University of Arizona, Tucson, Arizona, March 26, 2009, Interview.

⁴¹ Stephen Cornell, "What Makes First Nations Enterprises Successful?" 12-13.

⁴² Kahente Horn-Miller, "What Does Indigenous Participatory Democracy Look Like? Kahnawá:Ke's Community Decision Making Process," *Review of Constitutional Studies* 18, no. 1 (2013).

Section 4: Essential Components of Community Economic Development

This section provides insights on key elements that are required for tribal governments to pursue community economic development.

Any local or tribal government pursuing a community economic development strategy requires several common elements:

- Suitable land available for the intended purpose of community economic development;
- A skilled and ready workforce; and
- Business development and capital formation.

This section describes each of these elements. The discussion of land includes the particulars of location, infrastructure, and natural resources relevant to community economic development. The workforce section addresses the challenge of attracting workers as well as skills training and the role of tribal colleges and universities. Finally, the section on business development describes the importance of a market that includes suppliers, consumers, and adequate telecommunications.

Land

Location

Proximity to markets is important for economic growth. For example, it would be difficult to maintain a successful resort and casino on a reservation that is too remote to draw visitors and tourists from the surrounding area. To attract or maintain successful business enterprises and outside investors in the manufacturing, hospitality, or retail sectors, tribes need consistent access to suppliers, consumers, and employees. In seeking new or additional locations, often businesses screen locations based on population density and income demographics to forecast sales per square foot, revenue, and capacity for stand-alone profitability—metrics that place remote communities at a significant disadvantage. For tribes that are near other rural or urban communities, it may be advantageous to establish economic relationships with those communities. Research has found that “tribes that are more integrated with off-reservation economies have higher individual income, employment, and quality of life.”⁴³

It is important to point out that the remote locations of many reservations were the product of intentional choices made in the past by the federal government, choices that have “isolated the reservation from urban markets” and created a “legacy of federal neglect [that] has left an infrastructural base insufficient for development.”⁴⁴ While the federal outlook has shifted since

⁴³Lofthouse, “Institutions and Economic Development,” 239.

⁴⁴ Janet E. Kodras, “The Changing Map of American Poverty in an Era of Economic Restructuring and Political Realignment,” *Economic Geography*, 73:1 (1997): 87, DOI: 10.1111/j.1944-8287.1997.tb00085.x.

the time that these decisions were made, generations later tribes are still dealing with the consequences of these harmful policies,⁴⁵ and routine appropriations are inadequate to both catch up with and deal with the resulting current needs.⁴⁶ The remote locations of many reservations create impediments to siting grocery stores, pharmacies, chain restaurants, and other retail establishments, which have significant impacts on tribal members' quality of life and cost of living.

Infrastructure

Adequate basic infrastructure—in the form of roads, energy, water, waste management, and telecommunications—is a prerequisite for community economic development. Access to these critical components can be a challenge for Native communities due to the remote location of many reservations, challenging terrain within their lands, and a lack of adequate funding for improvements. A 2017 survey related to housing development in tribal areas found that infrastructure development was the most frequently cited barrier driving rising development costs.⁴⁷ Several tribes cited a lack of available funding, in addition to physical construction challenges, when explaining why it was difficult to service new housing development with adequate infrastructure.⁴⁸

Several funding sources are available to support the development or maintenance of infrastructure on tribal lands. These include funds from:

- The Indian Health Service (IHS) (especially Sanitation Facilities Construction);
- U.S. Department of Agriculture (USDA) Rural Development;
- Environmental Protection Agency (EPA), especially the Environmental General Assistance Program; and
- U.S. Department of Housing and Urban Development's (HUD) Indian Community Development Block Grant (ICDBG) and Indian Housing Block Grant (IHBG), which can be used specifically for infrastructure.⁴⁹ The Infrastructure Investment and Jobs Act of

⁴⁵ For example, Opportunity Zones, included in the Tax Cuts and Jobs Act of 2016 and designed to promote economic development in underserved areas, initially excluded tribal governments from participating in Opportunity Funds, a vehicle that investors can use to pool funds for development in Opportunity Zones. This oversight has since been addressed in regulations that were updated in 2019. See https://www.cherokeephoenix.org/news/tribes-shut-out-of-opportunity-zone-deals/article_1cfb3941-2635-50e9-a718-163e4d66d8b1.html. March 2019 and https://www.cherokeephoenix.org/news/tribes-shut-out-of-opportunity-zone-deals/article_1cfb3941-2635-50e9-a718-163e4d66d8b1.html. September 2019.

⁴⁶ Nancy Pindus et al., "Housing Needs of American Indians and Alaska Natives in Tribal Areas: A Report from the Assessment of American Indian, Alaska Native, and Native Hawaiian Housing Needs," U.S. Department of Housing and Urban Development Office of Policy Development and Research, 2017, 127, <https://www.huduser.gov/portal/sites/default/files/pdf/HNAIHousingNeeds.pdf>.

⁴⁷ Pindus et al., "Housing Needs of American Indians," 127.

⁴⁸ Since 1998, the first year that IHBG became operational, Congress has provided a consistent level of funding annually in nominal terms—an average of about \$667 million per year from 1998 through 2014. Over 17 years, however, inflation has seriously eroded that level. See Pindus et al., 2017.

⁴⁹ *Ibid.*

2021 (PL 117-58) also provided additional opportunities for infrastructure funding for tribes, with \$13 billion set aside for Indian Country.⁵⁰

In light of the physical and funding challenges faced when improving infrastructure, some tribes have gotten creative in how they provide services to their members. For example, rather than providing development-wide infrastructure, Citizen Potawatomi Nation offers individual water wells and septic systems built by the tribal Office of Environmental Health for tribal members purchasing or building a home in the service area. Other tribes have developed beneficial partnerships with local utility providers. At Gila River Indian Community, for example, the tribe has developed a partnership with Verizon to provide internet and phone service for members.⁵¹ Some tribes have also leveraged partnerships with nearby communities to develop better infrastructure. The Quileute Tribe in Washington state recently worked with the town of Forks on a broadband expansion initiative, and the Jamestown S’Klallam Tribe partnered with the city of Sequim to tap into the wastewater system of the city and lower infrastructure costs.⁵²

The need for adequate basic infrastructure to support community economic development extends beyond the needs of housing developments. For instance, manufacturing facilities may require access to heavy rail, interstate freeways, an airport, or a port. These factors make major cities on rail lines and interstate freeways more competitive for manufacturing employers. Adequate water, wastewater treatment, energy, and telecommunications capacity are also site selection criteria for manufacturing facilities. Topography may be important for larger facilities—most manufacturing plants require level land. The geotechnical condition of the land, such as its load bearing capacity, is also a consideration.

These resource requirements can make siting manufacturing and other projects on tribal land difficult. State and local governments offer a range of incentives to attract employers to locations that require infrastructure upgrades, including waiving connection fees or systems development charges and offering land or tax abatements.^{53,54} Tribes often compete for grants and capital against other communities that have shovel-ready sites where utilities are already in place or where developers have access to state and local incentives. Many tribes’ primary assets are land and natural resources, and smaller tribes may lack the capital to bring adequate utilities to an

⁵⁰ “Fact Sheet: Biden-Harris Administration Releases Tribal Playbook, Announces Massive New Tribal Funding from Bipartisan Infrastructure Law,” The White House, May 31, 2022, <https://www.whitehouse.gov/briefing-room/statements-releases/2022/05/31/fact-sheet-biden-harris-administration-releases-tribal-playbook-announces-massive-new-tribal-funding-from-bipartisan-infrastructure-law>.

⁵¹ Pindus, et al., “Housing Needs of American Indians,” 129.

⁵² Kramer et al., “Assessment of the Housing Needs,” 75.

⁵³ “Economic Development Incentives,” Chicago Metropolitan Agency for Planning, June 2009, accessed September 8, 2022, https://www.cmap.illinois.gov/documents/10180/50455/Economic+Development+Incentives+Strategy_June.pdf/0722371d-51d3-4f3e-aa15-171347ad7455.

⁵⁴ John E. Anderson, and Robert W. Wassmer, *Bidding for Business: The Efficacy of Local Economic Development Incentives in a Metropolitan Area* (Kalamazoo, MI: W.E. Upjohn Institute for Employment Research, 2000) 24, <https://doi.org/10.17848/9780585313610>.

undeveloped industrial site without charging the business owner or project developer. Yet, the employment benefits to the surrounding non-tribal community may be equal to or greater than the employment gains for tribal residents. Winchell’s study of the Inland Pacific Northwest found that successful tribal government operations and tribal economic and business developments in this region represent some of the most significant and positive economic change in rural areas anywhere in the nation.⁵⁵

Community facilities providing services such as education, health care, and child care also rely on infrastructure and face challenges similar to housing and manufacturing projects. Transportation infrastructure is critical for accessing health care, child care, and schools. Tribal member access to IHS facilities, many of which are the only primary care access points in remote areas, can be limited by a lack of transportation options and harsh weather conditions. Many IHS facilities are outdated and their infrastructure cannot support the most up-to-date medical equipment and treatments.⁵⁶

Broadband is critical for reliable and high-speed internet access and can enable distance learning and telemedicine, service needs that were highlighted during the COVID pandemic.⁵⁷ But while broadband access in tribal areas has grown steadily between 2013 and 2019, it does continue to lag behind other areas of the country. In 2019, all tribal areas were 20 percentage points behind urban areas, and about four percentage points behind other non-tribal rural areas in terms of individual access to broadband service.⁵⁸ Overall, approximately 65% of the population on rural tribal lands had access to fixed terrestrial 25/3 Mbps services in 2019, the minimum service speed necessary to be considered broadband. But the utility of that minimum speed has recently come under debate, with the Chairwoman of the Federal Communications Commission recently announcing a goal of raising it to 1 Gbps/500 Mbps in the near future.⁵⁹ The current rate of access for tribal members at that higher standard is much lower.

Many of these challenges related to infrastructure access can exacerbate potential employers’ and developers’ discomfort with community economic development in Native lands. Some funding programs assist low-income communities by reducing the cost of occupancy and offsetting infrastructure costs, but these programs are not a silver bullet for dealing with infrastructure issues, and come with their own challenges, such as jurisdictional issues, compliance

⁵⁵ Winchell, “Indigenous Rural Renewal.”

⁵⁶ “Tribal Infrastructure: Investing in Indian Country for a Stronger America,” National Congress of American Indians, 2017, <https://www.ncai.org/NCAI-InfrastructureReport-FINAL.pdf>.

⁵⁷ “Breaking Down Barriers to Broadband Access,” U.S. Government Accountability Office, *GAO Watch Blog*, August 11, 2022, <https://www.gao.gov/blog/breaking-down-barriers-broadband-access>.

⁵⁸ Stephanie Henning and Anthony “Morgan” Rodman, “National Tribal Broadband Strategy,” U.S. Department of the Interior, Indian Affairs, January 15, 2021, 3, <https://www.bia.gov/sites/default/files/dup/assets/as-ia/doc/2020.%20December.%20National%20Tribal%20Broadband%20Strategy%20FINAL-cover%20change.pdf>.

⁵⁹ “Chairwoman Rosenworcel Proposes to Increase Minimum Broadband Speeds and Set Gigabit Future Goal,” Federal Communications Commission, July 15, 2022, <https://www.fcc.gov/document/chairwoman-rosenworcel-proposes-increase-minimum-broadband-speeds>.

requirements, attracting investors, and inconsistencies in application of U.S. tax policy on Native lands.⁶⁰

Natural Resources

In addition to often being forced into remote locations, tribes have historically been separated from prime natural resources, including land with the best agricultural potential.⁶¹ In many cases, this has left tribes with limited community economic development opportunities. And even in cases where tribes are situated on resource-rich land, they had a limited ability to manage and benefit from those resources until the late twentieth century.

Many tribes have either discovered or recently regained access to their natural resources, and today, American Indians are stewards of a variety of land, water, mineral, oil and gas, and other resources. The passages of the Indian Mineral Development Act (IMDA) in 1982 and then the Tribal Energy Development and Self-Determination Act (TERA) of 2005 gave tribes substantially more control of the mineral resources on their lands. Now, once a tribe has gained approval from the Secretary of the Interior for a Tribal Energy Resource Agreement, the tribe has blanket authority to manage mineral development on its lands, without separate approval of each venture.⁶²

Native lands encompass an estimated 30% of the nation's coal reserves west of the Mississippi, as much as 50% of potential uranium reserves, and up to 20% of known natural gas and oil reserves.⁶³ As of 2011, 42 federally recognized tribes produced oil and gas, three had significant coal operations, and others had deposits of copper, uranium, and other rare earth minerals on their lands.⁶⁴ Having access to these potentially valuable natural resources can lead to complicated decisions for many tribes. While some tribes choose to develop these resources for economic gain, others do not—they may opt instead to protect the land that the resources are on, which may hold spiritual or cultural significance for the tribes. For example, the Northern Cheyenne Tribe ultimately elected not to mine their coal reserves, despite conflicting views within the tribe, and the San Carlos Apache Tribe and others fought the opening of a copper mine that was not on their reservation lands but was on land that was sacred to their people.⁶⁵

⁶⁰ Chex Oxendine, “Barriers to Tribal Economic Development Hinge on Sovereignty-related Issues,” *Tribal Business News*, April 11, 2022, <https://www.tribalbusinessnews.com/sections/economic-development/13861-barriers-to-tribal-economic-development-hinge-on-sovereignty-related-issues>.

⁶¹ Bryan Leonard, Dominic Parker, and Terry Anderson, “Land Quality, Land Rights, and Indigenous Poverty,” *Journal of Development Economics* 143, (2020): 4, <https://doi.org/10.1016/j.jdeveco.2019.102435>.

⁶² Maura Grogan, Rebecca Morse, April Youpee-Roll, “Native American Lands and Natural Resource Development,” Revenue Watch Institute, 2011, 15, https://resourcegovernance.org/sites/default/files/RWI_Native_American_Lands_2011.pdf.

⁶³ Grogan, et al., “Native American Lands,” 3.

⁶⁴ Grogan, et al., “Native American Lands,” 8-9.

⁶⁵ Grogan, et al., “Native American Lands,” 7.

Tribal Workforce

A sufficient pool of workers with the appropriate skills is necessary for sustained economic development. American Indians and Alaska Natives (AIAN) fare worse than individuals in the United States overall on each of the three most commonly used labor market metrics. Between 2019 and 2022:

- The labor force participation rate (the labor force divided by the population) for all of the country was 62.4% compared to 60.8% for AIAN people;
- The employment rate (the number of employed workers divided by the population) was 60.2% for the country and 57.4% for AIAN people; and
- The unemployment rate (the number of non-employed people who are available and looking for work—or who expect recall to a previous job—divided by the number of people in the labor force) was higher for AIAN people at 5.6% as compared to 3.6% for the U.S. overall.⁶⁶

Research from 2018 finds that, for many reservations, the number of jobs per inhabitant is on par with nearby county areas.⁶⁷ However, the employment rate on tribal lands is heavily driven by just a few sectors, such as art, entertainment and recreation, and public administration, which are closely tied to gaming and tribal government. This suggests that there are potential opportunities to expand job creation and economic development in the sectors where Indian Country still falls far behind neighboring counties, such as retail, manufacturing, and health and social services.⁶⁸

This opportunity for growth is further supported by evidence that, unlike the population of most of rural America, the American Indian population on tribal lands is growing, providing a potential workforce to fill new jobs.⁶⁹ Kunesh notes that Indian Country can be a positive part of the solution (or at least mitigation) of population loss in rural America.⁷⁰ Reservations are homelands for American Indians, creating intergenerational ties to the land and thus a rooted

⁶⁶ Center for Indian Community Development, “Native American Labor Market Dashboard,” Federal Reserve Bank of Minneapolis, accessed December 11, 2022, <https://www.minneapolisfed.org/indiancountry/resources/native-american-labor-market-dashboard>. The numbers cited are for individuals 16 and older based on Current Population Survey (CPS) 3-month rolling averages in September 2022.

⁶⁷ Richard M. Todd, “Industry Concentration of Jobs Highlights Economic Diversification Opportunity in Indian Country,” Center for Indian Country Development, Federal Reserve Bank of Minneapolis, 2018, <https://www.minneapolisfed.org/article/2018/industry-concentration-of-jobs-highlights-economic-diversification-opportunity-in-indian-country>.

⁶⁸ Richard M. Todd, “Industry Concentration of Jobs Highlights Economic Diversification Opportunity in Indian Country,” Center for Indian Country Development, Federal Reserve Bank of Minneapolis, 2018, <https://www.minneapolisfed.org/article/2018/industry-concentration-of-jobs-highlights-economic-diversification-opportunity-in-indian-country>.

⁶⁹ “Rural America At A Glance,” U.S. Department of Agriculture, 2018, <https://www.ers.usda.gov/publications/pub-details/?pubid=90555>

⁷⁰ Patrice H. Kunesh, “Getting Real about Indian Country Surprising Progress in the Heartland,” *Indian Country Today*, 2019, <https://newsmaven.io/indiancountrytoday/opinion/getting-real-about-indian-country-surprising-progress-in-the-heartland-P9OJ5PA0aECquc42NM5dYg>.

population that can help temper the general depopulation trend. Reservations have important economic strengths to offer rural America, including the ability to attract tourist dollars (from casinos, but also amenities and culture), agriculture and natural resources (minerals, forests, water), and unique access to federal funding sources.

Furthermore, education outcomes are promising for AIAN individuals. A 2010 report of the National Congress of American Indians (NCAI) noted that, based on 2005-2009 American Community Survey 5-Year estimates, when compared with the total United States population:

- More American Indians and Alaska Natives completed high school or an equivalent program, without additional higher education, than the total U.S. population (32% as compared to 29.3%);⁷¹
- More American Indians and Alaska Natives completed some college or an associate degree than the total population (31.2%, compared to 27.7%); however,
- Fewer completed a bachelor's degree or higher (12.8% compared to 27.5% for the total U.S. population).⁷² Nevertheless, this trend may be changing:
 - Native college enrollment more than doubled between 1976 and 2006;
 - The number of master's and doctoral degrees awarded to American Indians and Alaska Natives between 2000 and 2010 outpaced the total increase in master's and doctoral degrees awarded in total over that same time period (a 54% increase in the number of master's degrees awarded to Native students as compared to a 50.4% increase for the United States overall; and
 - An increase of 34.7% of doctorates awarded to Native students as compared to 31.9% for the United States overall.

While many tribal members with higher education degrees may leave reservations in search of economic opportunity, increased community economic development in tribal areas may encourage these individuals to remain or return to tribal lands.

Beyond having available jobs, improved education outcomes, and a growing population, tribes need to be able to equip potential workers for success with workforce development opportunities to build needed skills, as well as adequate pay and accessible and affordable housing. Developing housing near employment that is suitable for the income levels and family sizes of workers and near community amenities and services such as parks and schools is important for

⁷¹ General educational development tests are a group of four subject tests which, when passed, provide certification that the test taker has achieved American or Canadian high school-level academic skills.

⁷² NCAI Policy Research Center, "Tribal Insights Brief: Higher Education & Workforce Development: Leveraging Tribal Investments to Advance Community Goals," National Congress of American Indians, June 18, 2012, https://www.ncai.org/resources/ncai_publications/tribal-insights-brief-higher-education-workforce-development-leveraging-tribal-investments-to-advance-community-goals.

attracting and retaining workers. These factors should be considered part of a comprehensive community economic development strategy.

Unfortunately, in remote areas, these workforce development and affordable housing resources are in particularly short supply. The availability of labor was noted as a barrier to housing development by tribal housing providers that participated in a 2017 survey of Native American and Alaska Native housing needs.⁷³ Tribal housing departments and Tribally Designated Housing Entities (TDHEs) do not have enough construction activity to support the hiring and retention of construction workers (either in-house employees or contractors) on a consistent basis. The combination of irregular employment for construction workers on tribal land, limited training opportunities in some remote locations, and higher paying employment outside of tribal areas leads to worker shortages and higher costs, further limiting the volume of new construction that can be initiated.

Tribal Colleges and Universities

Tribal colleges and universities play an important role in meeting the postsecondary educational needs of American Indians, particularly those living in geographically isolated areas.⁷⁴ In addition to offering critical vocational training and academic opportunities, tribal colleges and universities are an important employer in many tribal communities. They also provide opportunities for tribal communities to build knowledge for generating wealth and economic development opportunities through the preservation of tribal culture, history, and traditions.⁷⁵

The academic resources available through tribal colleges can be most effectively deployed in conjunction with a strategic community economic development plan that targets a few industries or sectors. This way, educational programs can focus on the jobs likely to be available. With clear priorities, companion small business lending can focus on vendor, supplier, and services businesses to support the target industries. Target industries should be chosen in the context of the character of available land and infrastructure—for example, manufacturing plants have to have level land with good transportation, water, and power, while health care facilities need to be located near roads that are accessible to workers, residents and emergency vehicles.

In recent years many tribal colleges have implemented training programs in construction, health care, and science, technology, engineering and mathematics (STEM) careers.⁷⁶ For example, in 2015, Oglala Lakota College partnered with the University of Colorado at Boulder to train youth on the Pine Ridge Reservation in green construction methods while they worked on completing

⁷³ Pindus et al., “Housing Needs of American Indians.”

⁷⁴ Alisa F. Cunningham, “Tribal College Contributions to Local Economic Development,” Institute for Higher Education Policy, Washington, DC.; American Indian Higher Education Consortium, Alexandria, CA, 2000, http://www.aihec.org/our-stories/docs/reports/TC_contributionsLocalEconDevmt.pdf.

⁷⁵ Cunningham, “Tribal College Contributions to Local Economic Development.”

⁷⁶ Paul Boyer, “Ready for Work,” *Native Science Report*, accessed September 1, 2022, <https://nativesciencereport.org/2020/02/ready-for-work>.

the general education development (GED) test. The goal was to move these youth into employee-owned construction firms.⁷⁷

The Health Professions Opportunity Grants (HPOG) program, funded by the U.S. Department of Health and Human Services (HHS) Administration for Children and Families, provides education and training to Temporary Assistance for Needy Families (TANF) recipients and other low-income individuals for occupations in the health care field that pay well and are expected to either experience labor shortages or be in high demand. Five tribal colleges and other tribal organizations are HPOG grantees: Blackfeet Community College in Browning, MT; Cankdeska Cikana Community College in Fort Totten, ND; College of Menominee Nation in Keshena, WI; Cook Inlet Tribal Council, Inc. in Anchorage, AK; and Turtle Mountain Community College in Belcourt, ND.

In the first four years of the HPOG program (2010-2014) nearly 2,000 participants enrolled in the program across the five tribal colleges. Nearly half trained as nurse assistants, aides, or orderlies, and 18% trained as licensed practical nurses or vocational nurses. Other students trained as registered nurses, emergency medical technicians, medical records technicians, and other health-related occupations. As of year four of these five-year grants 1,138 students had completed the program, and 40% of those who were previously unemployed had found jobs in health care. Of those employed in other jobs at the time of enrollment, 35% were employed in health care by the time they completed the program.⁷⁸

In addition to federal initiatives, tribal organizations have been active in promoting workforce development. For example, the National Congress of American Indians' (NCAI) Partnership for Tribal Governance works collaboratively with tribal nations to document their innovative approaches and share them with actors across Indian Country. Examples of innovative approaches include the Empowerment Department of Ysleta del sur Pueblo, which provides a wrap-around system striving to eliminate programmatic redundancies, increase fiscal efficiency, and streamline its services; and the Coeur d'Alene Tribe's Education Pipeline that features 15 chronologically sequenced, educational groupings from Early Child through high school and GED programs, various post-secondary tracks, graduate degrees, and professional degrees. The NCAI also seeks to identify common challenges, emerging trends, and effective strategies in tribal workforce development. The project has developed in-depth case studies of four tribal nations, including videos and recorded interviews, and has published a workforce development toolkit for tribal decision-makers. In 2020, NCAI prepared a policy brief on workforce development with recommendations to federal policymakers.⁷⁹

⁷⁷ Pindus et al., "Housing Needs of American Indians."

⁷⁸ Michael Meit, et al., "Higher Education & Workforce Development in Tribal Communities & the Role of Tribal HPOG," Administration for Children and Families, U.S. Department of Health and Human Services, July 2015, www.acf.hhs.gov/sites/default/files/documents/opre/hpog_practice_brief_higher_education_and_workforce_development_in_0.pdf.

⁷⁹ "Workforce Development: Building the Human Capacity to Rebuild Tribal Nations," National Congress of American Indians, accessed September 1, 2022, <https://www.ncai.org/ptg/workforce-development>.

Business Development, Credit Access, and Capital Formation

When it comes to business development in tribal areas, Cornell suggests that tribes look for opportunities to establish three distinct business types:

1. Non-Native-owned enterprises;
2. Tribally owned enterprises; and
3. Citizen-owned enterprises.⁸⁰

This allows tribes to take advantage of the strengths of all three approaches while not being fully tied down by the disadvantages of any. Non-Native owners or partners can help bring in new expertise or capital, tribally owned businesses can control revenue distribution, and citizen entrepreneurship might be best suited for meeting daily community needs.⁸¹

Since the beginning of the self-determination era, tribal communities have been making progress when it comes to business development and economic growth. The number of tribal enterprises has grown significantly over the last 25 years, and especially the number of non-gaming tribal enterprises.⁸² According to a 2021 analysis by the Federal Reserve Bank of Minneapolis, this growth has even ticked up in recent years: 99 new non-gaming tribal businesses were recorded in the U.S. Small Business Administration (SBA) database in 2020, the most of any year on record.⁸³ Tribes are diversifying their business portfolios and opening businesses in industries such as professional services, construction, general administrative support, and manufacturing.

Credit access and financial literacy, which can promote individual economic opportunity and drive economic development in communities, are still underdeveloped in Native American communities.⁸⁴ The challenges stem, in large part, from the rural locations of tribal lands, since access to credit in rural areas can be limited by geographic distance and the lack of auxiliary services such as widespread broadband coverage. In addition, many Native individuals are unable to build credit with loans made through payday lenders, tribal credit operations, or banks in tribal areas that don't report to credit bureaus. Native American financial institutions, discussed in Section 6, are entities that primarily serve Native communities or have majority-Native ownership or leadership. These organizations have begun to step in to fill this credit-building gap.

⁸⁰ Cornell, "What Makes First Nations Enterprises Successful?"

⁸¹ Ibid.

⁸² Matthew Gregg and Elijah Moreno, "Examining tribal enterprises to understand Native economic development," Federal Reserve Bank of Minneapolis, July 14, 2021, <https://www.minneapolisfed.org/article/2021/examining-tribal-enterprises-to-understand-native-economic-development>.

⁸³ Ibid.

⁸⁴ Andrew P. Scott, "An Overview of Rural Credit Markets," Washington, DC: Congressional Research Service, September 21, 2021, <https://crsreports.congress.gov/product/pdf/R/R46914>.

The introduction of new facilities, organizations, and enterprises within and around tribal reservations provide an opportunity to increase earnings and employment for the local Native community, especially if they are tribally owned and operated. As Akee notes, tribally owned and operated businesses may have different priorities, and make business decisions that support tribal resilience and sovereignty, as compared to private business owners.⁸⁵ New development in Indian Country also has the potential to expand into new, innovative industries that can strengthen and diversify the economies in the area.⁸⁶ A coordinated effort to restore and expand existing land resources would give tribal governments the tools they need to improve job and income prospects, especially given the history of indigenous land theft.⁸⁷ This could include initiatives to lessen the disparity between tribe and private American Indian property ownership.⁸⁸ Additionally, it might give tribal inhabitants the option to support themselves through traditional subsistence activities in the nonmarket economy, which is something for which many tribal members commonly express a desire.⁸⁹

Digital Business Capacity

The COVID-19 pandemic has been devastating to tribal areas in many respects, but it has also compelled many tribes to improve their capacity to conduct business digitally. According to a report on the housing needs of Native communities in Washington State, many tribes were forced to update virtual communication and payment systems during the pandemic, and in many cases were able to leverage Coronavirus Aid, Relief, and Economic Security (CARES) Act funding to do so.⁹⁰ This has made things like remote work, online rent payment and service requests, and virtual regional and national meetings more accessible to tribal members. However, according to the DOI National Tribal Broadband Strategy, the broadband capacity necessary to attract industry is still limited. Insufficient service impedes tribes' efforts to achieve self-governance and self-determination, as well as individuals' access to education, health care, and economic resources.⁹¹

⁸⁵ Akee, "Sovereignty and Improved Economic Outcomes."

⁸⁶ Ibid.

⁸⁷ Ibid.

⁸⁸ Ibid.

⁸⁹ Ibid.

⁹⁰ Kramer, et al., "Assessment of the Housing Needs," 70.

⁹¹ Henning and Rodman, "National Tribal Broadband Strategy," 2.

Section 5: Sectors of Community Economic Development in Indian Country

This section covers the economic development activities within specific economic sectors that have historically been the primary contributors to the wealth and capital for Indian Country.

Local economies are an essential driver of economic well-being and the ability to improve living conditions in a given area.⁹² For Indian Country, there are a set of industries and economic sectors that have historically been the primary contributors to the generation of local wealth and capital. This section describes economic development activities within four broad economic sectors:

- Natural resources processing;
- Manufacturing, construction, and utilities;
- Consumer and business services; and
- Public sector, government, and community services.

By the end of the 1980s, significant disparities had emerged between tribes with respect to the scale and diversity of their economic enterprises. Some tribes had been successful in developing diverse types of private businesses and capitalizing on rich resources, but others had generated very few private sector jobs.⁹³ In more recent years, the desire to diversify into new and different economic sectors has been a main focus for many tribal governments and supporting organizations, and many have taken steps to develop and implement structures that prioritize non-gaming revenue and job creation.⁹⁴ The COVID-19 pandemic, which shuttered many casinos and hospitality businesses during 2020, added further motivation to diversify.⁹⁵

Natural Resources Processing

Natural Gas Extraction

As discussed in the previous section, in a 2011 estimate, Native lands were believed to contain nearly one third of the western United States' coal reserves, 50% of the country's potential uranium reserves, and 20% of its natural gas and oil reserves.⁹⁶ However, non-Native actors have

⁹² Pettit, et al., "Continuity and Change."

⁹³ Stephen Cornell and Joseph Kalt, "American Indian Self-Determination: The Political Economy of a Policy that Works. HKS Faculty Research Working Paper Series" John J. Kennedy School of Government, Harvard University, 2010, https://dash.harvard.edu/bitstream/handle/1/4553307/RWP10-043_Cornell_Kalt.pdf.

⁹⁴ "True Economic Diversification Financial Roundtable: Economic Diversification in Indian Country," Tribal Government Gaming, Tribal Government Gaming, 2020, <https://tribalgovernmentgaming.com/article/true-economic-diversification>.

⁹⁵ Mario Koran, "We've got to get gaming out of our blood," *Indian Country Today*, April 5, 2022, <https://indiancountrytoday.com/news/weve-got-to-get-gaming-out-of-our-blood>.

⁹⁶ Grogan, et al., "Native American Lands."

historically done much of the extraction of natural resources from Native lands, and in some cases (especially where Tribal Energy Resource Agreements [TERA] have not been established) the federal government retains significant authority to approve or deny these projects.⁹⁷

Despite these historical and administrative challenges, several tribes have created companies to control the extraction of natural resources on their lands. One such example is the Southern Ute Indian Tribe, located in Southwest Colorado. The tribe established the Red Cedar Gathering Company to control the extraction and treatment of natural gas within the bounds of its reservation in the San Juan Basin.⁹⁸ The Red Cedar Gathering Company is one division of the Southern Ute Indian Tribe Growth Fund; another is the Red Willow Production Company, which produces oil and natural gas both on the reservation and more broadly in the western United States and Gulf of Mexico.⁹⁹ The tribe also operates the Aka Energy Group with the goal of providing “infrastructure and innovation for the energy transition to carbon neutrality.”¹⁰⁰ Thanks largely to its resource extraction and alternative energy development activities, the tribe is the largest employer in La Plata County, Colorado, where the tribal headquarters and many tribal facilities are located.¹⁰¹

Natural Resource Protection and Conservation

There has been movement by many tribes with natural resource-dependent economies toward conservation and away from extraction industries. Many tribes have experienced extraction as exploitive and economic development efforts are pivoting towards environmental cleanup, including land reclamation and remediation.¹⁰² Reclamation refers to the process of “converting disturbed or damaged land to its former or other productive uses,” and remediation specifically means the removal and mitigation of contaminants from soil and water.¹⁰³ For example, the Confederated Tribes of Grand Ronde Community of Oregon are in the process of restoring land at Willamette Falls that had formerly been used as a paper mill since the arrival of European settlers in the 1800s. The tribes purchased the land in 2019 and are now undergoing the process of testing the site for environmental hazards and contaminants, decommissioning underground storage tanks on the site, and repurposing or demolishing portions of the mill. They eventually

⁹⁷ Grogan, et al., “Native American Lands.” The Tribal Energy Development and Self-Determination Act of 2005 allows tribes to gain approval from the Secretary of the Interior for a Tribal Energy Resource Agreement, giving them blanket authority to manage mineral development on its lands, without separate approval of each venture.

⁹⁸ “Business Areas,” Southern Ute Growth Fund, accessed September 6, 2022, <https://www.sugf.com/business>.

⁹⁹ “Red Willow Production Company,” Southern Ute Indian Tribe, accessed September 6, 2022, <https://www.rwpc.us>.

¹⁰⁰ “Business Areas.”

¹⁰¹ Ibid.

¹⁰² Carina Dominguez, “Indigenous Women Say ‘No’ to Extraction for Sustainable Future,” *Indian Country Today*, April 29, 2022, accessed September 6, 2022, <https://indiancountrytoday.com/news/indigenous-women-say-no-to-extraction-for-sustainable-future>.

¹⁰³ M. Anne Naeth, P. Michael Rutherford, and Allen M. Jobson, “Soil Reclamation and Remediation of Disturbed Lands,” University of Saskatchewan, August 12, 2021, accessed September 6, 2022, <https://openpress.usask.ca/soilscience/chapter/soil-reclamation-and-remediation-of-disturbed-lands>.

plan to use the land for mixed-use development and intend to find “opportunities to share the tribes’ cultural and historical stories” in and around the development.¹⁰⁴

Renewable energy presents another opportunity for community economic development in the natural resources sector outside the realm of extraction. The Fond du Lac Band of Lake Superior Chippewa Indians completed a solar project on its reservation in 2016 in line with its strategic energy plan, which has a goal of cutting energy use and emissions by 20% over the course of four years through renewable energy development, energy efficiency measures, and reduced fossil fuel purchasing.¹⁰⁵ The tribe received technical assistance on the solar project from the U.S. Department of Energy’s (DOE) National Renewable Energy Laboratory to implement the project cost-effectively using cutting-edge technology. Bruno Zagar, the Band’s environmental specialist and energy projects manager, describes the technical assistance as helping “bring in expertise for Indian Country, but it also helped the local utility to adopt the smartest technology available.”¹⁰⁶ Not only did the Band reduce its fossil fuel use by 50% and its carbon emissions by 80% by 2020,¹⁰⁷ it set a new technological and sustainability precedent for the state of Minnesota.¹⁰⁸

Manufacturing, Construction, and Utilities

Manufacturing and construction make up a significant proportion of Native-owned enterprises relative to the proportion of enterprises in the United States at large: along with professional services and general administrative support, these industries make up three-fourths of Native establishments, compared to 30% of all U.S. business establishments.¹⁰⁹

Manufacturing

Manufacturing enterprises are important sources of both job and capital creation for many tribes. For example, electronics manufacturer S & K Electronics, owned by the Confederated Salish and Kootenai Tribes in northwestern Montana, employs nearly 1,200 people and returns a portion of its revenue—nearly \$1 million in 2020—to the tribe as a dividend each year to help fund government services.¹¹⁰ Many tribes also look to manufacturing as an important area for growth and diversification away from the historically dominant industries in Indian Country, such as

¹⁰⁴ Dean Rhodes, “Tribe Receives \$800,000 EPA Grant to Clean up Blue Heron Site,” *Smoke Signals*, May 13, 2021, accessed September 6, 2022, <https://www.smokesignals.org/articles/2021/05/13/tribe-receives-800-000-epa-grant-to-clean-up-blue-heron-site>.

¹⁰⁵ “Fond Du Lac Band Poised to Double 2020 Clean Energy Goal,” U.S. Department of Energy, September 27, 2016, <https://www.energy.gov/indianenergy/articles/fond-du-lac-band-poised-double-2020-clean-energy-goal>.

¹⁰⁶ “Fond Du Lac Band Poised to Double 2020 Clean Energy Goal,” U.S. Department of Energy, September 27, 2016, <https://www.energy.gov/indianenergy/articles/fond-du-lac-band-poised-double-2020-clean-energy-goal>.

¹⁰⁷ “Strategic Energy Plan,” FDL Resource Management, 2022, accessed September 7, 2022, <https://www.fdlrez.com/RM/energyplan.htm>.

¹⁰⁸ “Fond Du Lac Band Poised to Double 2020 Clean Energy Goal.”

¹⁰⁹ Gregg and Moreno, “Examining tribal enterprises.”

¹¹⁰ James Robert Colombe and Rory Taylor, “Tribal Enterprises Drive Economic Activity in Indian Country and Beyond,” Federal Reserve Bank of Minneapolis, July 6, 2021, <https://www.minneapolisfed.org/article/2021/tribal-enterprises-drive-economic-activity-in-indian-country-and-beyond>.

natural resource extraction and gaming. Tribal colleges and universities, such as Navajo Technical University, are developing and expanding their engineering programs to expand available pathways to careers in manufacturing and other STEM industries.¹¹¹ A variety of federal programs are available for financing manufacturing projects in Native lands, including Economic Development Administration (EDA) grants and New Markets Tax Credits (NMTC).

Construction

Construction, like manufacturing, provides a variety of opportunities for Native communities. Construction growth can provide needed jobs, but also additional facilities and infrastructure that are needed in tribal areas. Much of the work Native-owned construction firms do is in non-Native lands, but the percentage of projects controlled by Native firms in Indian Country is growing.¹¹² One construction firm making strides in Indian Country is Rosebud Construction, Inc., which is owned and operated by the Rosebud Sioux (or *Sicangu Oyate*) Tribe. As a tribally owned enterprise housed under the umbrella of the tribe's economic development corporation, Sicangu Co, their proceeds are reinvested in development projects that create jobs on the Rosebud Reservation in southern South Dakota.¹¹³

Housing construction, for example, is necessary for both community economic development and increasing homeownership rates in Indian Country. Not only does the construction of housing in Native communities create employment opportunities for community members, but it also addresses the housing shortages frequently seen on reservations where rates of homelessness and overcrowding are often high.¹¹⁴

Although HUD programs in tribal areas have always had the twin goals of supporting both housing and community economic development, current funding levels are insufficient for tribes and tribal housing entities to address the shortage of housing units, complete necessary repairs and renovations for existing housing units, and promote higher levels of homeownership.¹¹⁵ Tribes are taking new approaches and leveraging additional funds. For example, on the Cheyenne River Indian Reservation, located in South Dakota, the Badger Park housing subdivision was developed in response to a housing needs assessment on the reservation demonstrating high demand for and low supply of units available for homeownership.¹¹⁶ The

¹¹¹ Marcella Bombardieri, "At Navajo Technical University, a World-Class Laboratory Is Building Native American Manufacturing Capacity," Center for American Progress, January 24, 2023, <https://www.americanprogress.org/article/at-navajo-technical-university-a-world-class-laboratory-is-building-native-american-manufacturing-capacity>.

¹¹² Michele Van Haecke, "Native American Construction on the Rise," *ENRSouthwest*, May 1, 2010, <https://www.enr.com/articles/23503-native-american-construction-on-the-rise>.

¹¹³ "Rosebud Construction," Sicangu Co., accessed September 6, 2022, <https://www.sicangu.co/construction>.

¹¹⁴ Jennifer Biess, "Homelessness in Indian Country Is a Hidden, but Critical, Problem," *Urban Wire*, Urban Institute, April 11, 2017, <https://www.urban.org/urban-wire/homelessness-indian-country-hidden-critical-problem>.

¹¹⁵ Pindus et al., "Housing Needs of American Indians."

¹¹⁶ Anne Celovsky, Amber Hunter, Katelin Jones, Kevin Klingbeil, Mary Lindeblad-Fry, and Nancy Pindus, "Cheyenne River Housing Authority Housing Needs Study Report," South Dakota Native Homeownership Coalition, accessed September 6, 2022,

Cheyenne River Housing Authority has been building modular single-family units (which are then placed on the subdivision) since 2016 to meet this demand.¹¹⁷

Telecommunications Utilities

As described in Section 4, robust infrastructure and utilities are an essential element for community economic development. The construction and installation of these utilities also provide an opportunity for job creation and economic diversification in Native lands. Improving telecommunications utilities and internet access in Indian Country has been a major focus of tribal leadership in the last decade.

The need for expanded broadband access was acutely demonstrated during the shift to remote school and office work in the COVID-19 pandemic. With limited home internet access, students were especially challenged by the closure of schools, libraries, and other institutions that offer access to public Wi-Fi.¹¹⁸ Established in 2021, the National Telecommunications and Information Administration's Tribal Broadband Connectivity Program has funded nearly 150 broadband projects to date across Indian Country to help close this gap.¹¹⁹ Two reservations, Pine Ridge and Rosebud, received grants from the \$3 billion program in August 2022. The grants will allow the reservations to develop and operate their own broadband services and will fund broadband connections to an estimated 3,300 homes spanning 2.5 million acres. In response to the grant award, Kevin Killer, president of the Oglala Sioux Tribe noted that “how strong your internet is — is related to how strong your economy is going to be, essentially.”¹²⁰

Alaska’s ambitious broadband connectivity push serves as an example of effective use of New Market Tax Credits (NMTCs). The AU-Aleutians Fiber Project is working to connect Alaska Native villages throughout the state, including some of its most remote communities.¹²¹ The project is a collaboration between several community development entities and GCI, Alaska’s largest telecommunications company. According to Lewis Schnaper, vice president of GCI Business, using NMTCs to fund the project helped to unlock over \$200 million in private

<https://static1.squarespace.com/static/5be730232487fdec648106ac/t/5c7078a1e4966b8d06adb454/1550874816156/Final+CRHA+Housing+Study+HQ+PDF+-+no+Bleed.pdf>.

¹¹⁷ Brendan Pedersen, “Ignored by banks, Indigenous communities build their own financial system,” University of Arizona, July 14, 2021, accessed September 6, 2022,

https://nnigovernance.arizona.edu/sites/default/files/resources/2021%20American%20Banker_0.pdf.

¹¹⁸ Brian Howard and Mikhail Sundust, “COVID-19: The Impact of Limited Internet Access and Issues with Social Distancing for Native Students,” American Indian Policy Institute, Arizona State University, accessed September 6, 2022, https://aipi.asu.edu/sites/default/files/indigenous_digital_divide_policy_brief.pdf.

¹¹⁹ “TBCP Awards,” National Telecommunications and Information Administration, accessed April 28, 2023, <https://broadbandusa.maps.arcgis.com/apps/dashboards/07f987529ae24273aec3320e5033d503>.

¹²⁰ Shalom Baer Gee, “Pine Ridge, Rosebud Reservations Receive \$70M Broadband Grant,” Rapid City Journal, August 23, 2022, accessed September 6, 2022, https://rapidcityjournal.com/news/pine-ridge-rosebud-reservations-receive-70m-broadband-grant/article_04f7788c-ef2e-5115-9e7f-a7731c22aeca.amp.html.

¹²¹ “GCI, Wells Fargo Partner to Make AU-Aleutians Fiber Project a Reality,” GCI Newsroom, April 27, 2021, accessed September 6, 2022, <https://news.gci.com/news-releases/new-market-tax-credits>.

investment for a “broadband network now serving over 44,000 mostly Alaska Native people in 84 remote western Alaska communities.”¹²²

Consumer and Business Services

Gaming

The success of gaming enterprises run by tribes has sparked and enabled much of the economic development activity happening in Indian Country. Winchell notes that after the Indian Gaming Regulatory Act (IGRA) was passed in 1988, many tribes were able to develop “extremely successful tribal gaming operations that produced a rapidly expanding capacity for tribal business operations and investment, and a re-emergence of successful and effective tribal economies.”¹²³ In many cases, the proceeds from the gaming industry have allowed tribes to “become self-determined, to purchase back the lands that were taken from them, and to re-establish sustainable tribal traditions, cultures, and successful economies.”¹²⁴ Economic growth resulting from these profits has also allowed tribes to demonstrate to outside actors their capacity for managing significant economic investment.

Despite the benefits of gaming for some tribes, these benefits have not been enjoyed equally. As Pettit, et al. point out, a large share of casino revenues goes to a small number of tribes: for instance, in 2011, 5% of tribal gaming enterprises (23 enterprises) generated about 38% of total Indian gaming revenues, and 18% (78 enterprises) accounted for close to 75%.¹²⁵ In addition, these revenues are geographically uneven, tending to be concentrated near major population centers. While tribal gaming enterprises in rural areas may still be important employers for local tribal members, they might not be particularly profitable community economic development solutions if they have limited nearby customer bases.

Of those tribes that have been able to benefit from gaming, many have used those revenues to pivot into other industries and diversify their tribes’ economic activity. In some cases, tribes are making investments with gaming capital that “put them in the ranks of America’s largest companies.”¹²⁶ For example, recent large-scale development deals in Las Vegas include the Mohegan Tribe’s Mohegan Sun Casino at Virgin Hotels Las Vegas, the San Manuel Band’s Palm Casino Resort, and a new property by the Hard Rock Hotel, owned by the Seminole Tribe of Florida.¹²⁷

¹²² “Alaska – New Markets Tax Credit Coalition,” accessed September 7, 2022, <https://nmtccoalition.org/state/alaska>.

¹²³ Winchell, “Indigenous Rural Renewal,” 177.

¹²⁴ Winchell, “Indigenous Rural Renewal,” 175.

¹²⁵ Pettit, et al., “Continuity and Change,” xiii.

¹²⁶ Mark Trahant, “At The Crossroads: State of the Economy in Indian Country.,” *Indian Country Today*, 2022. <https://indiancountrytoday.com/news/at-the-crossroads-state-of-the-economy-in-indian-country>.

¹²⁷ *Ibid.*

Hospitality and Tourism

The hospitality industry is becoming a growing focus for tribes looking to diversify their economic landscape beyond gaming.¹²⁸ Tourism and hospitality enterprises, such as attractions and lodging, can also generate opportunities for other local businesses by drawing people to a Native community. Grants like the BIA Tribal Tourism Grant and the Native Hawaiian Tourism Grants administered by the Hawaii Tourism Authority can support businesses in planning development to grow tribal economies.¹²⁹ One example of a successful and multi-faceted hospitality and tourism enterprise in this space is the Grand Canyon Resort Corporation, which is owned by the Hualapai Tribe and operates multiple tourism businesses, such as the Grand Canyon Skywalk. This tribal enterprise has been in business for over 30 years, and in 2015 the resort reached a milestone of one million total visitors. According to Sherry Counts, Hualapai Tribal Council chairwoman, the success of this enterprise has been used to improve the electrical and water systems at Grand Canyon West, provide housing for employees, construct new facilities for health care, and invest in Hualapai youth, including the tribe's Head Start program, Boys and Girls Club, and academic scholarships.¹³⁰

Business Services

Business services include any service that supports business but does not produce physical goods; for example, communications, insurance, the provision of business supplies, and technology support. AMERIND is one such business service provider, the only fully tribally owned insurance provider in the country. Based in New Mexico and originally created as a risk-sharing pool between 400 tribes, AMERIND provides property and liability insurance, workers' compensation, and employee benefits to tribal governments as well as businesses and individuals in Indian Country.¹³¹ AMERIND's Chief Operating Officer Robert Dahl sees this as an embodiment of tribal sovereignty and self-determination: "[W]hen tribes purchase conventional, statutory workers' compensation policies, they are not only signing up for a standard, one-size-fits-all model, they're waiving their sovereign immunity and subjecting themselves to state jurisdiction and courts."¹³² Business services companies created by and for tribes and tribal members allow for customized approaches. In the case of AMERIND, the tribe purchasing insurance can operate under its own jurisdiction and sovereignty in its business dealings.

¹²⁸ Ibid.

¹²⁹ Tribal Business News Staff, "Office of Indian Economic Development Opens Applications for Tribal Tourism Grants Program," *Tribal Business News*, August 23, 2021, accessed September 6, 2022, <https://tribalbusinessnews.com/sections/tourism/14001-office-of-indian-economic-development-opens-applications-for-tribal-tourism-grants-program>.

¹³⁰ "Grand Canyon West reaches 1 million visitors, gearing up for 2016 tourism," *Navajo-Hopi Observer*, January 12, 2016, accessed December 12, 2022, <https://www.nhnews.com/news/2016/jan/12/grand-canyon-west-reaches-1-million-visitors-gear>.

¹³¹ "Tribal Government & Business," AMERIND, accessed September 6, 2022, <https://amerind.com/services/tribal-government-business>.

¹³² Robert Dahl, "AMERIND Empowers Tribes to Take Control of Their Insurance Programs," *Tribal Business News*, July 25, 2022, accessed September 6, 2022, <https://tribalbusinessnews.com/sponsored-content-category/13976-amerind-empowers-tribes-to-take-control-of-their-insurance-programs>.

Public Sector, Government, and Community Services

The public sector is an important space for community economic development in Indian Country. Tribal governments and organizations themselves are often the largest or one of the largest employers on reservations and in Native communities.¹³³ Tribes provide a range of services, and tribal health centers and community facilities are often accessible in remote Native communities where other service providers are not.

Health Care

As a necessary service, health care is an important sector driving employment in many Native communities. The federal government is obligated by law to provide health care to American Indians and Alaska Natives, and it does so through the IHS, which runs health centers in many tribal areas. In addition to health care, these health centers provide much needed jobs for tribal members. Furthermore, there is room to grow: Many tribes lack access to the necessary health care facilities, and IHS has been criticized for being chronically underfunded by congressional appropriations.¹³⁴ Many tribes are stepping in to leverage other federal funding sources to increase development in the health care sector.

In August 2022, the EDA awarded the Chippewa Cree Tribe a \$1 million grant to construct a tribal health center on the Rocky Boy's Reservation in Montana.¹³⁵ Funded by the American Rescue Plan, the grant will fund the infrastructure supporting the health center. About \$66,000 in local funds is matching the EDA grant. The project is expected to create 14 jobs and generate \$58,845 in private investment on the reservation, in addition to providing critical health services to the community where access to health care facilities was previously limited.¹³⁶

Another Native community health center project, and one which demonstrates the use of NMTCs to support public sector development, is the West Hawaii Community Health Center in the Kealahou Hawaiian Home Land. Construction began in 2013 and the Health Center began serving patients in 2015.¹³⁷ A 10,000-square-foot facility, the center has four exam rooms, a procedure room, and five dental procedure rooms (two serving adults and three pediatric).¹³⁸ The center also provides behavioral health, family planning, and health education services, and an affiliated mobile dental clinic serves community members experiencing homelessness. The

¹³³ Trahan, "At The Crossroads."

¹³⁴ Misha Friedman, "For Native Americans, Health Care Is A Long, Hard Road Away," *NPR*, April 13, 2016, <https://www.npr.org/sections/health-shots/2016/04/13/473848341/health-care-s-hard-realities-on-the-reservation-a-photo-essay>.

¹³⁵ "U.S. Department of Commerce Invests \$1 Million in American Rescue Plan Funds to Support Construction of Tribal Health Center on Rocky Boy Reservation," U.S. Economic Development Administration, August 16, 2022, accessed September 6, 2022, <https://eda.gov/news/press-releases/2022/08/16/rocky-boy-reservation.htm>.

¹³⁶ *Ibid.*

¹³⁷ "West Hawaii Community Health Center Opens," *Big Island Video News*, July 15, 2015, accessed September 7, 2022, <https://www.bigislandvideonews.com/2015/07/15/west-hawaii-community-health-center-opens>.

¹³⁸ "La'i 'Ōpua Celebrates New Health Center," Department of Hawaiian Home Lands, December 13, 2013, accessed September 7, 2022, <https://dhhl.hawaii.gov/2013/12/12/la%ca%bbi-%ca%bbopua-celebrates-new-health-center>.

center employs health care practitioners and social workers, as well as administrative and managerial staff, and provides on-the-job training in clinical entry-level roles.¹³⁹ The health center was the first step in the creation of the La‘i ‘Ōpua Community Center, which opened in 2020 and will provide community members with a preschool, social service center, intergenerational day care facility, abuse shelter, and community recreation facilities.^{140,141}

Child Care and Education

The development of child care and educational facilities provides another important opportunity for tribes to generate community economic development while also providing critical services to their communities. There are a variety of federal sources that fund the development of educational programs and facilities in Indian Country. For example, the USDA’s Community Facilities program provides grants and loans for education services and other community facilities projects in rural areas, while the U.S. Department of Education’s State Tribal Education Partnership (STEP) provides funds for capacity building around the administration of educational programs in Native communities. New Markets Tax Credits can also be leveraged to develop new educational facilities.

In 2013, the confederated Tribes of Warm Springs Reservation of Oregon leveraged a low-interest loan from the USDA’s Community Facilities Program for the construction of a new K-8 school complex. Additional funding was provided by the tribal government and Jefferson County School District 509-J. The new, 8,000-square-foot complex replaced an 83-year-old elementary school, benefitting approximately 720 schoolchildren.¹⁴² The Winnebago Tribe used NMTC funding to open its Educare center in 2013, the first of its kind in a tribal community.¹⁴³ Located on the Winnebago Reservation in Nebraska, the center provides early childhood education and child care to infants, toddlers, and preschoolers, focusing specifically on families earning low incomes on the reservation. Serving nearly 200 students and families, the tribe’s long-term community development goal with the Educare center is to close the education gap that can disproportionately affect children in remote areas and those whose parents earn low incomes. The project has also created 59 permanent jobs paying about double the area’s average salary and supported 73 short-term construction jobs while the center was being built.¹⁴⁴

¹³⁹ “Employment – Hawai‘i Island Community Health Center,” accessed September 7, 2022, <https://www.hicomunityhealthcenter.org/employment>.

¹⁴⁰ “La‘i ‘Ōpua Breaks Ground on Community Center,” Department of Hawaiian Home Lands, March 15, 2017, accessed September 7, 2022, <https://dhhl.hawaii.gov/2017/03/15/la%ca%bbi-%ca%bbopua-breaks-ground-on-community-center>.

¹⁴¹ “La‘i ‘Ōpua Celebrates New Health Center.”

¹⁴² Jill Rees, “USDA Announces Funding for New School Complex for the Confederated Tribes of the Warm Springs Reservation,” U.S. Department of Agriculture, June 19, 2013, <https://www.rd.usda.gov/newsroom/news-release/usda-announces-funding-new-school-complex-confederated-tribes-warm-springs>.

¹⁴³ “Winnebago Educare,” New Markets Tax Credit Coalition, July 29, 2021, accessed September 7, 2022, <https://nmtccoalition.org/project/winnebago-educare>.

¹⁴⁴ “Winnebago Educare,” New Markets Tax Credit Coalition, July 29, 2021, <https://nmtccoalition.org/project/winnebago-educare>.

Section 6: Native Actors Promoting Community Economic Development in Indian Country

This section describes the actors, programs, and sources of funding and capital involved in catalyzing economic development in Indian Country.

While tribal governments work towards economic growth, they also prioritize preserving tribal culture, identity, sovereignty, and land. This combination creates a unique set of interests that is distinct from other rural communities. Many organizations have been established to assist tribes in balancing these priorities while fostering economic development.

Increasingly, Native financial institutions have stepped up in response to limited access to capital and a sparse distribution of financial institutions on Native lands. Tribal economic development corporations, as well as regional and national Native organizations, help to promote economic development, share best practices, provide technical assistance, and advocate for policies that support economic development in Native communities.

But access to these specialized economic entities is not evenly distributed across Indian Country. The Federal Reserve Bank of Minneapolis' Center for Indian Country Development maps the headquarters locations and asset sizes of banks and credit unions owned by, and CDFIs primarily serving, American Indian, Alaska Native, and Native Hawaiian individuals and communities. Their map shows the unevenness of availability and access, with potential gaps in the Southeast and Mountain States, while Hawaii, Oklahoma, and South Dakota each contain more certified Native CDFIs than any other states.¹⁴⁵

The section below describes the current distribution and capacity of Native actors promoting economic development in Indian Country.

Community Development Financial Institutions (CDFIs)

Native Community Development Financial Institutions (Native CDFIs) are an important connector between Native communities and community economic development opportunities. Native CDFIs are community development financial institutions that direct at least 50% of their activities to serve Native Americans, Alaska Natives, or Native Hawaiian communities.

Native CDFIs have the potential to bridge the gap between the goals of tribes and non-Native investors. A recently announced grant award demonstrates federal policymakers' awareness of this gap and of the key role that Native CDFIs can play in tribal economic development. The Mountain Plains Regional Native CDFI Coalition, a group of Native-led and mission-driven community development loan funds, received a \$45 million grant through the competitive Build Back Better Regional Challenge, funded by the American Rescue Plan and administered by the

¹⁴⁵ "Mapping Native American Financial Institutions," Center for Indian Community Development, Federal Reserve Bank of Minneapolis, accessed September 6, 2022, <https://www.minneapolisfed.org/indiancountry/resources/mapping-native-banks>.

EDA. The Coalition will use the grant to invest in indigenous businesses and entrepreneurs to drive business development and job creation in Montana, South Dakota, Wyoming, and North Dakota. It will also create a locally led financing infrastructure, including a Regional Revolving Loan Fund, which “aims to reverse decades of historical disinvestment and institutionalized inequities for Native communities.”¹⁴⁶ The EDA funding will also support a training program, improve data infrastructure, and make other investments that will expand the capacity of the indigenous financial sector.¹⁴⁷

Jorgensen and Akee, reviewing the history and development of Native CDFIs, find that the demand for credit and capital remains high and will continue to increase as Native community economies grow.¹⁴⁸ They find that the greatest challenge facing the Native CDFI industry is greater capitalization, and that substantial capital additions to CDFI Fund awards, along with tribal government support, are needed to fuel a new level of growth. Native CDFIs currently rely primarily on equity capital, but one solution for greater capitalization is shifting towards a greater use of debt capital, which can be accessed from a variety of sources ranging from the federal government to private foundations, other tribes, and mainstream CDFIs.

A 2017 survey of 39 certified Native CDFIs across the United States confirms the finding that the Native CDFI industry is growing, but that there are still unmet lending opportunities in the industry.¹⁴⁹ The leading products and services provided by Native CDFIs are small consumer loans and consumer financial education. About 70% of the survey respondents indicated that their loan or investment portfolios contained less than \$5 million in assets, and about 43% reported total assets in their loan or investment portfolios of less than \$1 million. Meanwhile, 22% of the respondents reported portfolios of over \$10 million. Respondents also expected their portfolios to grow significantly by 2020.¹⁵⁰ The Department of the Treasury reports a total of 65 Native CDFIs located in 23 states as of March 2023.¹⁵¹

These portfolios demonstrate significant growth in the Native CDFI industry since 2001, when financials for seven Native CDFIs showed an average portfolio of \$1.1 million in assets and only

¹⁴⁶ “U.S. Department of Commerce Invests Approximately \$45 Million to Grow the Indigenous Finance Sector in Montana, North Dakota, South Dakota, Wyoming Through American Rescue Plan Regional Challenge,” U.S. Department of Commerce, September 2, 2022, accessed September 14, 2022, <https://www.eda.gov/news/press-release/2022/09/02/us-department-commerce-invests-approximately-45-million-grow>.

¹⁴⁷ Ibid.

¹⁴⁸ Miriam Jorgensen and Randall K.Q. Akee, “Access to Capital and Credit in Native Communities: A Data Review,” Tucson, AZ: Native Nations Institute and the Arizona Board of Regents, 2017, https://nnigovernance.arizona.edu/sites/nnigovernance.arizona.edu/files/2022-09/Accessing_Capital_and_Credit_in_Native_Communities__A_Data_Review.pdf.

¹⁴⁹ Michael Kododoko, “Findings from the 2017 Native CDFI Survey: Industry Opportunities and Limitations.” Center for Indian Country Development, Federal Reserve Bank of Minneapolis, November 2017. <https://www.minneapolisfed.org/~media/files/community/indiancountry/resources-education/working-papers/cicd-wp-2017-04.pdf>.

¹⁵⁰ Ibid.

¹⁵¹ “CDFI Certification,” CDFI Fund, U.S. Department of the Treasury, accessed April 24, 2023, <https://www.cdfifund.gov/programs-training/certification/cdfi>.

\$351,000 in loans and investments outstanding. Native CDFIs have been persistent in their growth in the intervening years: Four of the 2017 respondents obtained their CDFI certification in the years between 2007-2009, when the economic crisis was impacting the operations of many nonprofits. This is an indication of Native CDFIs' commitment to delivering financial services to Native American communities.¹⁵²

Native CDFIs are also essential players bridging the Native homeownership gap that stems in large part from the challenges of mortgage lending and homeownership on tribal lands. Although programs exist to support mortgage lending to tribal members, including HUD's Section 184 Indian Home Loan Guarantee Program (which provides lenders with assurance should a Native borrower foreclose), these investments have largely not taken place on reservations, especially on trust land. Native CDFIs have stepped in to fill this gap, working with tribally designated housing entities to support Native borrowers with programs tailored to work for their specific communities. Four Bands Community Fund, founded in 2000 as part of a community and economic development push on the Cheyenne River Reservation,¹⁵³ partnered with the Cheyenne River Housing Authority to provide financial services supporting home ownership in Badger Park. This CDFI offers mortgages and credit builder loans to reservation residents in addition to providing homebuyer education programs.¹⁵⁴

Native CDFI: Lakota Funds. Established in 1986 as the first Native CDFI, Lakota Funds was created with the goal of improving access to capital, technical assistance, business networks, and infrastructure on the Pine Ridge Indian Reservation in South Dakota. Since its inception, Lakota Funds has deployed over 1,250 loans totaling over \$17.5 million, has helped establish or expand nearly 850 businesses, and has created nearly 2,050 permanent jobs. The organization's loan portfolio now exceeds \$4 million, and its maximum loan size is \$300,000. It is also an active member of the South Dakota Native Homeownership Coalition.¹⁵⁵

Community Development Corporations (CDCs)

Community development corporations (CDCs) are community-centered nonprofit organizations whose primary purpose is to provide resources and revitalize low-income, historically underserved areas and neighborhoods that have experienced high levels of disinvestment.¹⁵⁶ CDCs often specialize in a variety of different initiatives, such as providing services related to affordable housing, sanitation, neighborhood planning, community health, and educational services.¹⁵⁷ CDCs operate by bringing in capital via property development (both residential and commercial). They are primarily composed of community members and often work to enhance

¹⁵² Kokodoko, "Findings from the 2017 Native CDFI Survey."

¹⁵³ Lakota Vogel, "Developing a Healthy Economy | Cheyenne River," The Architectural League of New York, September 11, 2020, accessed September 6, 2022, <https://archleague.org/article/cheyenne-river-reservation-healthy-economy/>.

¹⁵⁴ Celovsky et al., "Cheyenne River Housing Authority Housing Needs Study Report," 23.

¹⁵⁵ "Our Story," Lakota Funds, accessed January 11, 2023, <https://lakotafunds.org/about/>.

¹⁵⁶ "Community Development Corporations (CDCs)," Community-Wealth.Org, February 18, 2014, <https://community-wealth.org/strategies/panel/cdes/index.html>.

¹⁵⁷ "Community Development Corporations (CDCs)."

community conditions through community organizing, which is critical for citizen empowerment and building political power.¹⁵⁸

Homestead Community Development Corporation. The Homestead Community Development Corporation (HCDC) is a Native Hawaiian-serving organization with the mission of developing affordable housing and economic opportunities on or near Native Hawaiian trust land, known as “homesteads” or Hawaiian Home Lands.¹⁵⁹ HCDC is one of the few developers that directly assists Native Hawaiians in increasing access to housing opportunities and homeownership through programs like modified self-help homes, modular tiny homes, and rental units.¹⁶⁰ In addition to housing, HCDC provides employment assistance and job opportunities through a variety of economic development projects, such as a community campground, an open-air marketplace, a youth center, a 55-acre commercial solar facility, and an enterprise center which provides educational services, low-cost retail spaces, community gathering space, and employment opportunities.¹⁶¹ HCDC also provides lending for enterprises through its Homestead Loan Fund.¹⁶²

Native American Community Development Corporation. An affiliate of the Native American Bank, the Native American Community Development Corporation (NACDC) works alongside Native communities to address factors which inhibit economic development in Indian Country, and to address critical needs related to the growth of family and community assets through sustainable economic development.¹⁶³ Located on the Blackfeet Indian Reservation, NACDC provides a range of services to Native community members, such as adult and youth entrepreneurship and financial literacy classes, alternative financing opportunities for start-ups and existing businesses, and credit repairing assistance.¹⁶⁴

Native Credit Unions and Banks

In the U.S., Native financial institutions such as banks and credit unions are one of the smallest categories of minority depository institutions, or MDI—in 2022, only 20 of the 145 MDI banks registered with the FDIC were Native MDIs.¹⁶⁵ Of the 65 Native CDFIs in the United States (as of March 2023), two are Depository Institution/Holding Companies (DIHCs), three are banks or thrifts, seven are credit unions, and 53 are loan funds.¹⁶⁶

¹⁵⁸ Ibid.

¹⁵⁹ “Creating Jobs and Affordable Housing on Hawaiian Homelands,” Homestead Community Development Corporation, accessed September 6, 2022, <https://hawaiianhomesteads.org>.

¹⁶⁰ Ibid.

¹⁶¹ Ibid.

¹⁶² Ibid.

¹⁶³ “Native American Community Development Corporation,” NACDC, 2008, <https://nacdc.org/about.html>.

¹⁶⁴ “Native American Community Development Corporation.”

¹⁶⁵ “Minority Depository Institutions List,” Federal Deposit Insurance Corporation, November 30, 2022, <https://www.fdic.gov/regulations/resources/minority/mdi.html>.

¹⁶⁶ “CDFI Certification.”

Unfortunately, many Native Americans live in “credit deserts,” or areas with limited access to credit, particularly those who live near or on Indian reservations.¹⁶⁷ The average distance between the center of a tribal reservation and the nearest bank is 12.2 miles, and the average distance between the center of a tribal reservation and the nearest ATM is 6.9 miles.¹⁶⁸ Residents of tribal reservations may have to travel more than 60 miles to the nearest bank or ATM. In contrast, the average distance that individuals not living on a tribal reservation need to travel to find an ATM is approximately 0.01 miles.¹⁶⁹ Jorgensen and Akee acknowledge that there have been some improvements in geographic access to financial services for Native communities between 2001 and 2013. As of 2013, a greater number of residents in Native communities appear to live “close enough to bank branches and ATMs to make banking a viable option.”¹⁷⁰

Credit default is typically higher among Native Americans who live in majority-Native communities.¹⁷¹ Poor credit scores, combined with the car dependency of rural areas and limited access to credit unions, makes high-risk lending, such as payday lending, a commonly used option. Native credit unions and banks that provide financial literacy education, reasonably priced access to loans for cars, small business lending, and credit builder loans are a significant help in moving Native communities away from high-risk lending options.¹⁷² Credit unions often provide the same financial services that traditional banks provide, at a lower cost due to lower capital requirements and operational costs.¹⁷³

Bank: The Bank of Cherokee County. Founded in 1907, the Bank of Cherokee County is a tribally owned bank in Cherokee County, Oklahoma which invests around 95% of deposits back into the county, unlike other traditional banks.¹⁷⁴ In addition, the Bank of Cherokee County strives to uplift the workplace and community through community services and volunteering. It

¹⁶⁷ “Native-owned Banks and Credit Unions: Serving the Underserved,” Native American Financial Services Association, <https://nativefinance.org/news/native-owned-banks-and-credit-unions-serving-the-underserved>.

¹⁶⁸ “Native-owned Banks and Credit Unions: Serving the Underserved,” Native American Financial Services Association, <https://nativefinance.org/news/native-owned-banks-and-credit-unions-serving-the-underserved>.

¹⁶⁹ Ibid.

¹⁷⁰ Jorgensen and Akee, “Access to Capital and Credit.”

¹⁷¹ Kassandra Martinchek and Alexander Carther, “Native Communities Face Sustained Challenges to Building Financial Resilience,” *Urban Wire*, Urban Institute, February 25, 2021, <https://www.urban.org/urban-wire/native-communities-face-sustained-challenges-building-financial-resilience>.

¹⁷² Nikki Pieratos, “Native Credit Unions: A Middle Path for Building Financial Access and Capability in Native Communities,” Federal Reserve Bank of Minneapolis, February 15, 2019, <https://www.minneapolisfed.org/article/2019/native-credit-unions-a-middle-path-for-building-financial-access-and-capability-in-native-communities>.

¹⁷³ “Native Credit Unions Provide Needed Services for Tribal Communities,” *Native Knot*, April 18, 2019, <https://www.nativeknot.com/news/Native-American-News/Native-Credit-Unions-Provide-Needed-Services-for-Tribal-Communit.html>.

¹⁷⁴ “Our Story,” Bank of Cherokee County, <https://www.bankofcherokeecounty.net/about/our-story>.

is the only bank in the town of Hulbert, Oklahoma and has branches in Tahlequah and Park Hill.¹⁷⁵

Bank: Bay Bank. The Oneida Nations' Bay Bank in Green Bay, Wisconsin is a tribally owned bank founded by the Oneida Nation in 1995 in partnership with a group of local business professionals.¹⁷⁶ From the start, it had the mission of providing the Greater Green Bay area with a locally controlled financial institution. The institution has been exclusively owned by the Oneida Nation since 2000, and while it serves all customers, its mission has expanded to include providing more federally funded programs to directly assist tribal members. For example, it is the only bank in the area to offer the HUD Section 184 Indian Home Loan Guarantee Program for Native home buyers. Bay Bank also developed specialized mortgage and business programs to assist tribal members in obtaining housing and entering entrepreneurial work.¹⁷⁷

Credit Union: The Lac Courte Oreilles Federal Credit Union. Since 2000, the Lac Courte Oreilles (LCO) Band of Lake Superior Chippewa Indians located near Hayward, Wisconsin, has been served by the Lac Courte Oreilles Federal Credit Union, which is open to any LCO tribal member or employee of an LCO tribal entity such as the casino, tribal office, or schools.¹⁷⁸ The LCO Federal Credit Union strives to be responsive to the community's distinct financial needs, and to promote economic strength and development, as well as leadership, by assisting LCO tribal members in obtaining and accumulating savings, increasing purchasing power, and providing educational opportunities to promote financial literacy.¹⁷⁹ The credit union offers financial literacy classes once a season on topics such as operating a checking and savings account, budgeting, understanding credit, and local economy sustainability. Classes are held in various communities and locations on the LCO reservation to ensure accessibility.¹⁸⁰

Credit Union: The Seneca Nation of Indians Federal Credit Union. Open to any enrolled members, immediate family members, or employees of the New York Seneca Nation of Indians and Seneca Gaming Corporations and subsidiaries, the Seneca Nation of Indians Federal Credit Union (SNIFCU) provides low-cost financial services and opportunities that provide local development and circulate wealth within the community.¹⁸¹ In addition, SNIFCU members can participate in voting for the Board of Directors for the institution.¹⁸²

¹⁷⁵ "Our Story."

¹⁷⁶ "About Us," Bay Bank, <https://www.baybankgb.com/About-Us>.

¹⁷⁷ Ibid.

¹⁷⁸ "Welcome to LCO Federal Credit Union - Home," LCO Federal Credit Union, <https://www.lcofcu.com/index.php>.

¹⁷⁹ Ibid.

¹⁸⁰ Ibid.

¹⁸¹ "Membership Eligibility - Seneca Nation of Indians Federal Credit Union," SNIFCU, <https://www.snifcu.org/membership.php/#HTJ>.

¹⁸² Ibid.

Tribal Economic Development Departments and Chartered Entities

Economic Development Corporations (EDCs) are organizations, often 501(c)(3) nonprofits, that provide economic development in a specific geographical location.¹⁸³ EDCs provide a variety of services to assist businesses and communities to generate and expand successful economic development. Some of their services include:

- Offering information, assistance, and resources to those launching new firms within corporate boundaries;
- Giving grants, loans, and tax-exempt bonds to businesses as financial aid within a specific location; and
- Business recruitment of new personnel and assistance with on-the-job training.¹⁸⁴

These services are invaluable resources for business owners, many of whom would not have been able to launch their corporations without such assistance. Many of the services can act as a safety net for business owners, ensuring that their operations lead to additional profits and allowing for increased productivity and employment opportunities for the community.¹⁸⁵

Tribal economic development corporations can be established to serve the economic development needs of Indian Country by increasing access to business resources. They promote the expansion of tribal resources and community development opportunities to increase wealth and business ventures. Corporations such as Ho-Chunk, Inc., the San Pasqual Economic Development Corporation, and the Sicangu Co. are all examples of Native-led EDCs established with the intent to serve a specific Native-community within a location while prioritizing community sustainability and economic resilience.

Sicangu Co. Sicangu Co. (formerly the Rosebud Economic Development Corporation, or REDCO) is a Native-focused, place-based EDC which focuses on addressing the systemic issues faced by the Sicangu Lakota Oyate Nation within the Rosebud Sioux Tribe.¹⁸⁶ Sicangu Co. is guided in improving the Sicangu Oyate by a “7Gen vision,” or the promotion of a “healthy, just, and abundant world Seven Generations from now” guided by ancestral, holistic, and cultural Lakota wisdom.¹⁸⁷ Sicangu Co. is the result of a merger between Rosebud Economic Development Corporation (REDCO) and Tatanka Funds, a Native CDFI, and is focused on business and policy development. Profits that are generated from Sicangu Co. are redistributed back into community development, tribal programming, and growth and development of the organization.¹⁸⁸ Sicangu Co. administers the 7Gen internship, an opportunity for individuals to

¹⁸³ “Functions of an Economic Development Corporation,” Hardee County Economic Development Council, Hardeebusiness.com, <https://hardeebusiness.com/resources/functions-of-an-economic-development-corporation>.

¹⁸⁴ Ibid.

¹⁸⁵ Ibid.

¹⁸⁶ “About Us,” SICANGU CO, <https://www.sicangucorp.com/about-us-1>.

¹⁸⁷ “Rosebud-Based Ecosystem Re-Brands as Sicangu Co,” Sicangu Co, 28AD, <https://www.sicangucorp.com/post/rosebud-based-ecosystem-re-brands-as-sic-a-%C6%9Eg-u-co>.

¹⁸⁸ “About Us,” SICANGU CO.

learn more about economic and community development and advocate for change by leading a community-based project.¹⁸⁹

Ho-Chunk, Inc. The Winnebago Tribe—located in Thurston and Dixon counties, Nebraska, and Woodbury County, Iowa—started Ho-Chunk, Inc. in 1994 to help its people by creating jobs and diversifying the tribe’s revenue. Its goal was to establish an entrepreneurial company that was able to recognize and develop various economic opportunities. As Ho-Chunk, Inc. has grown, so has its economic impact—locally and across the tri-state region of Nebraska, Iowa, and South Dakota. Ho-Chunk, Inc. is now a leading regional employer and prominent developer of real estate and other capital projects. Recognizing the critical importance of qualifying tribal members for jobs with the company, Ho-Chunk, Inc. has established several education and training initiatives. These include internships that provide work experience within a business environment to college students ranging from the first year through the master’s level; college or technical college scholarships for selected candidates; and academic development opportunities to Winnebago tribal member students in 7th to 12th grade.¹⁹⁰

San Pasqual Economic Development Corporation (SPEDC). SPEDC is authorized by the San Pasqual Band of Mission Indians, located in Southern California, to pursue economic development activities on behalf of the tribal government and members. The organization is charged with developing and implementing the tribe’s long-term strategy of sustainable economic self-sufficiency. The mission of the San Pasqual Economic Development Corporation is to preserve and safeguard the tribe’s culture and traditions through the creation of a long-term economic development structure, ensuring prosperity for the next seven generations of the tribe. SPEDC has developed and overseen several projects, including Horizon Gas Station and The Pit Stop Market in Valley Center, CA, a \$7 million project spanning 8,100 square feet that brings convenient retail to the surrounding area while holding true to the community’s roots. The Native Oaks Golf Course and restaurant is another SPEDC project that attracts visitors, employs tribal members, and follows the natural contours of the countryside.¹⁹¹

Alaska Native Corporations¹⁹²

Alaska Native Corporations, established in 1971 through the Alaska Native Claims Settlement Act (ANCSA), are the largest private landowners in the state of Alaska, and provide a significant contribution to Alaska’s state economy and a source of jobs and wages that benefit Alaska Natives.¹⁹³ In 2019, the combined revenue of all Alaska Native corporations totaled \$9.1

¹⁸⁹ “Growing Lakota Knowledge, Building Lifelong Skills, Making Memories,” SICANGU CO, <https://www.sicangu.co/news/growing-lakota-knowledge>.

¹⁹⁰ “Ho-Chunk Incorporated,” Ho-Chunk, Inc., accessed April 30, 2023, <https://www.hochunkinc.com>.

¹⁹¹ “Who We Are,” San Pasqual Economic Development Corporation, accessed April 30, 2023, <https://sanpasqualedc.com>.

¹⁹² See Appendix A for additional information about the Alaska Native Claims Settlement Act (ANCSA).

¹⁹³ “Native Corporations Overview,” Resource Development Council, <https://www.akrdc.org/alaska-native-corporations>.

billion.¹⁹⁴ The often sizable dividends from the Alaska Native corporations constitute a substantial portion of household incomes for Alaska Natives. ANCSA divided the land of Alaska into 12 regions, each with a Regional Corporation delegated by Alaska Natives and dedicated to addressing the real social and economic needs of Natives within their corporation.¹⁹⁵ Alaska Native corporations frequently collaborate with resource industries on development projects and take advantage of economic opportunities that are available to them.¹⁹⁶

The 12 Alaska Native Regional Corporations are as follows:

1. Ahtna, Inc.,
2. The Aleut Corporation,
3. Arctic Slope Regional Corporation,
4. Bering Straits Native Corporation,
5. Bristol Bay Native Corporation,
6. Calista Corporation,
7. Chugach Alaska Corporation,
8. Cook Inlet Region, Inc.,
9. Doyon Limited,
10. Koniag Incorporated,
11. Nana Regional Corporation, and
12. Sealaska Corporation.

Homestead Associations of Hawaii¹⁹⁷

Homestead Associations in Hawaii, comparable to tribes on the U.S. mainland,¹⁹⁸ are beneficiary-controlled organizations that serve and represent the interests of Hawaii's homestead community.¹⁹⁹ Homestead Associations work with Homesteads and Beneficiary Associations (HBA) to assist the DOI in administering federal laws that apply to trust lands and trust funds.²⁰⁰ The Sovereign Council of Hawaiian Homestead Associations (SCHHA) is the longest running, largest self-governing federation of homestead associations, and is devoted to preserving and

¹⁹⁴ Ibid.

¹⁹⁵ "Native Corporations Overview."

¹⁹⁶ Ibid.

¹⁹⁷ See Appendix A for additional information pertaining to Hawaiian Home Lands.

¹⁹⁸ "About the SCHHA," Homestead Community Development Corporation, <https://hawaiianhomesteads.org/schha>.

¹⁹⁹ Ibid.

²⁰⁰ "Homestead & Beneficiary Associations: Frequently Asked Questions," U.S. Department of the Interior, <https://www.doi.gov/hawaiian/homestead-beneficiary-associations-faq>.

expanding self-determination and sovereignty of Native Hawaiians who are eligible under the 1920 Hawaiian Homes Commission Act.²⁰¹

The Department of Hawaiian Home Lands (DHHL), governed by the Hawaiian Homes Commission Act of 1920, was created to improve and protect the lives of Native Hawaiians of Hawaiian heritage.²⁰² DHHL acts to serve Native Hawaiian beneficiaries and manage Hawaiian Home Lands within its land trust, which contains over 200,000 acres spread across the islands of Maui, Moloka'i, O'ahu, Kaua'i, Hawai'i, and Lāna'i.²⁰³ DHHL serves Native Hawaiians in a variety of ways: beneficiaries may be granted 99-year homestead leases at a cost of \$1 per year for residential, agricultural, or pastoral purposes.²⁰⁴ These leases may be extended for a total term of no more than 199 years.²⁰⁵ Beneficiaries may receive financial assistance for home purchase, construction, replacement, or repair through direct loans, insured loans, or loan guarantees.²⁰⁶ However, as a state agency, DHHL has received criticism for its failure to provide homesteads in a quick and efficient manner.²⁰⁷ Program applicants have reported decades-long waiting lists, unclear financial expectations for qualification, and unsuitable homestead lands,²⁰⁸ which create complications for Native Hawaiians looking to obtain homestead housing.²⁰⁹

Tribal Organizations

Tribal organizations play an important role in providing information, convenings, training, and advocacy for tribes on the topic of community economic development. Each of the organizations described in this section has a unique focus, but all support tribal governance and community economic development.

National Congress of American Indians. The National Congress of American Indians (NCAI), founded in 1944, is the oldest and largest American Indian and Alaska Native rights organization meant to represent Native tribes in advocating for tribal sovereignty and against assimilation and the termination of tribal rights by the federal government.²¹⁰ NCAI's constitution includes the goal of improving "economic development, health, and welfare in Indian and Alaska Native communities."²¹¹ The organization actively promotes tribal economic investments in Indian

²⁰¹ "About the SCHHA."

²⁰² "About The Department of Hawaiian Home Lands," Department of Hawaiian Home Lands, <https://dhhl.hawaii.gov/dhhl>.

²⁰³ Ibid.

²⁰⁴ "About The Department of Hawaiian Home Lands."

²⁰⁵ Ibid.

²⁰⁶ Ibid.

²⁰⁷ Rob Perez and Agnel Philip, "To Reclaim Ancestral Land, All Native Hawaiians Need Is a \$300,000 Mortgage and to Wait in Line for Decades," ProPublica, October 24, 2020, <https://www.propublica.org/article/hawaii-native-land-homesteads-department-of-hawaiian-home-lands>.

²⁰⁸ Blaze Lovell, "The Problem With Hawaiian Homestead Land? Much Of It Can't Be Developed," *Honolulu Civil Beat*, <https://www.civilbeat.org/2019/06/the-problem-with-hawaiian-homestead-land-much-of-it-cant-be-developed>.

²⁰⁹ Ibid.

²¹⁰ "About NCAI," National Congress of American Indians, <https://www.ncai.org/about-ncai>.

²¹¹ "About NCAI," National Congress of American Indians, <https://www.ncai.org/about-ncai>.

Country with the goal of spurring innovative economic policy and growth while honoring tribal sovereignty.²¹² NCAI conducts research and prepares policy reports which outline opportunities for economic development, how tribes are exercising and advocating for sovereignty and securing economic success through sustainable practices.

Native American Finance Officers Association. The Native American Finance Officers Association (NAFOA) was established in 1982 to financially assist tribal economies and strengthen tribal finance.²¹³ NAFOA promotes responsible fiscal and economic policy, promotes financial and economic literacy, and brings together tribal leadership, seasoned professionals, and business partners.²¹⁴ NAFOA provides memberships to 140 member tribes over more than 25 states and connects them to services such as training on financial management, grant management and improved administrative processes; advocacy opportunities; exclusive membership events and networking; and discounts on conference registrations and publications.²¹⁵ NAFOA also administers the NAFOA Institute, which provides educational and professional opportunities for tribal members, from early career and young professional development to executive leadership and grants management.²¹⁶

National American Indian Housing Council. Founded in 1974, the National American Indian Housing Council provides training and technical assistance to all tribes and tribal housing entities, supporting them in providing safe, affordable, and culturally appropriate housing for Native people and communities.²¹⁷ NAIHC also conducts research and provides informational services within the realm of Native housing issues and programs.²¹⁸ NAIHC hosts the annual Legislative Conference in Washington D.C., an event which provides tribal advocates, leaders, attorneys, and other housing professionals the opportunity to hear directly from congressional members and federal representatives regarding the decisions that directly affect tribal programs, communities, and funding.²¹⁹ NAIHC also hosts an annual convention and trade show in partnership with AMERIND, and an annual legal symposium where over 500 tribal specialized housing professionals, tribal leaders, federal agencies, and law firms gather to address emerging tribal housing issues.²²⁰

National Center for American Indian Enterprise Development. The National Center for American Indian Enterprise Development (NCAIED) is the largest Native-centered national

²¹² “Economic Development & Commerce,” National Congress of American Indians, <https://ncai.org/policy-issues/economic-development-commerce>.

²¹³ “About NAFOA,” Native American Finance Officers Association, <https://nafoa.org/about>.

²¹⁴ “About NAFOA.”

²¹⁵ Ibid.

²¹⁶ “NAFOA Institute,” Native American Finance Officers Association, <https://nafoa.org/institute>.

²¹⁷ Erla Sagg, “About NAIHC,” Native American Indian Housing Council, <https://naihc.memberclicks.net/about-naihc>.

²¹⁸ “About the National American Indian Housing Council,” Native American Indian Housing Council, <https://naihc.net/about-2>.

²¹⁹ “NAIHC 2022 Legislative Conference,” Native American Indian Housing Council, <https://web.cvent.com/event/5312605d-98d4-413e-bc91-f9e245470cee/summary>.

²²⁰ “NAIHC 2022 Legal Symposium,” Native American Indian Housing Council, <https://naihc.net/legal-symposium>.

business organization. It is a 501(c)(3) nonprofit that strives to improve the lives of current and future generations of Native Americans.²²¹ NCAIED hosts the annual Reservation Economic Summit (RES), the country's largest tribal economic development conference, which offers business development sessions and networking and collaboration opportunities aimed at facilitating access to capital and enterprise development.²²²

Partnerships and Regional Development Efforts

Many tribal governments have addressed tribal economic development in collaboration with each other at a regional level, in addition to their individual efforts. For example, the Affiliated Tribes of Northwest Indians (ATNI), the South Puget Intertribal Planning Agency (SPIPA), the Great Lakes Inter-Tribal Council (GLITC), the Upper Columbia United Tribes (UCUT), and the United South and Eastern Tribes (USET) all pull together multiple tribes within specific regions of the United States for knowledge sharing, collaboration, and collective advocacy.

For example, the Affiliated Tribes of Northwest Indians (ATNI), which operates as a regional congress of tribal elected leaders and staff with over 50 member tribes in seven states, has actively worked to keep economic development issues on the forefront of tribal discussion through its Economic Development Committee (EDC).²²³ ATNI's economic development subsidiary (ATNI-EDC) provides financial and technical assistance for community and economic development efforts to the ATNI member tribes and their tribal members.²²⁴ The Upper Columbia United Tribes (UCUT), made up of the Coeur d'Alene Tribe of Idaho, the Kootenai Tribe of Idaho, the Confederated Tribes of the Colville Reservation, the Spokane Tribe of Indians, and the Kalispel Tribe of Indians, collaborate on several inter-tribal initiatives for natural resources and fisheries management on their lands in the Upper Columbia watershed.²²⁵

Beyond partnerships, many tribal entities have become powerful economic players and service providers in their surrounding regions. Winchell explores several examples of this in the Pacific Northwest. The Coeur d'Alene Tribe's wellness center, for example, is a public facility that is open to all residents of the region. It offers multiple swimming pools, gyms, weight and training rooms, as well as meeting rooms and an office for health care providers. The Confederated Tribes of the Colville Reservation operates four grocery stores that service rural areas. Overall, Winchell finds that "tribes have become important players within the rural regional economy and are now often in the lead in new innovations and investment in rural facilities and business operations."²²⁶

²²¹ "About NCAIED: The National Center for American Indian Enterprise Development," The National Center for American Indian Enterprise Development, <https://www.ncaied.org/about>.

²²² "About the Summit | The National Center for American Indian Enterprise Development | RES 2022," RES 2022 - Reservation Economic Summit, accessed September 13, 2022, <https://res.ncaied.org/Summit-Info/About>.

²²³ Winchell, "Indigenous Rural Renewal," 176.

²²⁴ "Affiliated Tribes of Northwest Indians Economic Development Corporation," Affiliated Tribes of Northwest Indians Economic Development Corporation, accessed September 15, 2022, <https://atniedc.com>.

²²⁵ Winchell, "Indigenous Rural Renewal," 191-192

²²⁶ Winchell, "Indigenous Rural Renewal," 191-192

Sovereign Wealth Funds

A sovereign wealth fund (SWF), also known as a social wealth fund or a sovereign investment fund, is a state-owned investment which generates wealth for the benefit of its citizens and economy.²²⁷ SWFs are created to help diversify an entity's source of revenues to strengthen its types of income streams, and have been successfully managed by authorities such as the Abu Dhabi Investment Authority (ADIA) and the China Investment Corporation (CIC). The introduction of SWFs in Indian Country can help with the diversification of wealth beyond the sectors or industries that tribes currently engage in or have access to, such as casinos and agriculture.

Seminole Tribes' Sovereign Wealth Fund. The Seminole Tribe of Florida developed a sovereign wealth fund to improve financial benefits and generational wealth to the Seminole Tribe.²²⁸ The Seminole SWF recently acquired its first real estate investment asset. Located in uptown Dallas, Texas, the McKinney Uptown Apartments are a midrise, upscale, residential 144-unit complex with luxury amenities and located close to dining, entertainment, and office space.²²⁹ Due to the increase in demand for multifamily apartment rentals, the real estate market has seen a steep increase in demand for apartment units and is an investment opportunity that has provided wealth for the Seminole Tribe.²³⁰ The tribe has historically received SWF revenue from casinos and other gaming properties, and the addition of commercial real estate allows for the tribe to further diversify contributions to the sovereign wealth fund.²³¹

²²⁷ "Sovereign Wealth Fund (SWF)." Investopedia.

https://www.investopedia.com/terms/s/sovereign_wealth_fund.asp.

²²⁸ Ari Rioseco, "Tribe Creates Sovereign Wealth Fund," The Seminole Tribune, <https://seminoletribune.org/tribe-creates-sovereign-wealth-fund>.

²²⁹ Ibid.

²³⁰ Ibid.

²³¹ Ibid.

Section 7: Sources of Funding and Capital for Community Economic Development

This section highlights the various potential sources of funding and capital available for community economic development in Indian Country.

There are a wide number of federal tools that have been leveraged for community economic development in Indian Country, with varying degrees of success. Tribes have historically had to rely primarily on public funds and grants to support their development projects. But in recent decades, increased income from tribal enterprises, the need for more capital for larger development projects, and federal incentives to leverage private funding to develop tribal housing have led to a more diversified mix of funding and capital in Indian Country.

However, tribes still face challenges when it comes to accessing non-Native capital for projects, and private investors also note risks or perceived risks associated with investing in Native projects.²³² Recent trends such as social impact investing and the response to the COVID-19 pandemic are changing the way both tribes and investors evaluate and structure projects. The successful examples of community economic development projects listed in the previous sections show the range of expertise and capacity among tribal governments, Native CDFIs, Native banks, Native CDEs, and other tribal entities, as well as the expansion potential of Native economies.

To fully understand the scope of economic development activities within Indian Country, it is important to note the common primary funding sources, such as government and private grants and loans, tribal capital, private investment, and tax incentives, as well as the possible ways to combine them. Several federal agencies, such as HUD and the EDA, have created special programs, set-asides, or initiatives focused on addressing the unique needs of tribal entities. Existing tribal revenue streams from tribal enterprises and reimbursements can be used to leverage additional capital and enable capital stacking.

A recently completed study from the U.S. Government Accountability Office (GAO) examined economic development programs available to tribal entities and found that federal efforts to support economic development show fragmentation and some overlap. GAO reports that programs are fragmented across seven agencies: the USDA, U.S. Department of Commerce, DOE, HHS, HUD, DOI, and the SBA. The tribal organizations that GAO spoke with said many tribes have limited capacity to identify and access programs and may not be aware of the federal assistance available.²³³

Table 1 towards the end of this section provides a high-level summary of select significant federal programs that offer funding for economic development in Indian Country, including the

²³² “Access to Capital.”

²³³ “Tribal Economic Development: Action is Needed to Better Understand the Extent of Federal Support,” U.S. Government Accountability Office (GAO), August 2022, <https://www.gao.gov/assets/gao-22-105215.pdf>.

funding type, eligibility criteria, authorized purposes, and typical award amounts. In the following paragraphs, we offer a more in-depth look at these various funding categories. Additional funding that may be supportive of community economic activities may come from other sources, such as FEMA, EPA, DOE, and state and local programs.

Grants

U.S. Department of Housing and Urban Development (HUD)

HUD offers two primary block grant programs that are specifically designed for Native projects: the Indian Housing Block Grant (IHBG) and the Indian Community Development Block Grant (ICDBG). Per its name, IHBG is focused on the operation, maintenance, and development of affordable housing in Indian Country, while the ICDBG can be used for community facilities and other economic development activities, in addition to housing.

IHBG was authorized by the Native American Housing Assistance and Self-Determination Act of 1996, PL 104-330, as amended (NAHASDA). This legislation changed the system for funding and developing tribal housing, with a focus on tribal self-determination and flexibility to accommodate the diversity of needs and cultural preferences across Indian Country. It was also designed to enable and encourage tribes to secure more private investment for housing projects. IHBG funds are awarded by formula to federally recognized tribes or their Tribally Designated Housing Entities (TDHEs), as well as a limited number of state-recognized tribes.²³⁴

While the program was designed to encourage private investment, an analysis of Annual Performance Report data submitted by NAHASDA grantees (through 2013) showed that grantees received less than \$2 per \$100 of IHBG grants in private sector investment. However, the flexibility and complexity of leveraging private investment, which is often combined with other government or tribal funds, makes reporting this information especially difficult.²³⁵

The ICDBG grant funds are split up into two categories: single purpose and imminent threat.²³⁶ Federally recognized tribes or villages and a limited number of state-recognized tribes and tribal organizations can apply for single-purpose grants on a competitive basis, while imminent threat grants are offered on a first-come, first-served basis to address threats to the public health or safety of tribal residents. Funds can be used for housing, community facilities, and economic development.

U.S. Department of Agriculture (USDA)

The United States Department of Agriculture has several grant programs that help contribute to rural development in both tribal and non-tribal areas. These various programs provide funding

²³⁴ “Indian Housing Block Grant Program,” U.S. Department of Housing and Urban Development, accessed August 24, 2022, https://www.hud.gov/program_offices/public_indian_housing/ih/grants/ihbg.

²³⁵ Pindus, et al., “Housing Needs of American Indians.”

²³⁶ “Indian Community Development Block Grant Program,” U.S. Department of Housing and Urban Development, accessed August 24, 2022, https://www.hud.gov/program_offices/public_indian_housing/ih/grants/icdbg.

for activities such as the construction of water infrastructure, community facilities, utilities, telecommunications systems, as well as the preservation and construction of affordable housing, small business development, and initiatives at tribal colleges and universities.²³⁷ The Community Facilities Direct Loan and Grant Program provides grants, low interest direct loans or a combination of the two, and offers a loan guarantee program. The funds can be used to purchase, construct, or improve essential community facilities, purchase equipment and pay related project expenses. The ReConnect Program offers loans, grants, and loan-grant combinations to facilitate broadband deployment in areas of rural America that currently do not have sufficient access to broadband. The Rural Business Development Grants and the Rural Innovation Stronger Economy (RISE) Grants provide businesses of various sizes with grants, loans, and technical assistance to secure employment opportunities in rural communities.

U.S. Economic Development Administration (EDA)

The EDA offers a variety of grant programs aimed at promoting community economic development for communities across the country, including Native communities. They include the Build to Scale program, which funds tech-based projects, the Economic Adjustment Assistance program, which provides support for public works and infrastructure projects in regions experiencing adverse economic changes, and the Local Technical Assistance and Planning programs, which support capacity-building activities such as economic feasibility studies, impact analyses, disaster resiliency plans, and project planning.²³⁸

Many tribes and Native organizations have leveraged EDA grants to develop businesses, public works, and infrastructure to support community and economic development. However, a 2004 GAO report found that the success of projects funded by these grant programs has been mixed, in terms of generating jobs, higher incomes, and private sector investment.²³⁹ Additionally, the report found that these shortcomings were not a result of issues with tribal governance, but instead stemmed from the challenges associated with a complex federal grant process of application, review, approval and monitoring. This highlights one of the key challenges associated with using federal grant funding for economic development.

As a part of the American Rescue Plan Act of 2021 (ARPA), the EDA received an additional infusion of \$100 million to allocate to indigenous communities, with awards ranging from \$100,000 to \$5,000,000 towards projects designed to create the conditions for economic growth in indigenous communities. Recipients of these funds can include tribes, a consortium of tribes, or nonprofits that serve Native Hawaiians or Pacific Islanders. This money can be used to help

²³⁷ “All Programs,” U.S. Department of Agriculture, accessed on September 13, 2022, <https://www.rd.usda.gov/programs-services/all-programs>.

²³⁸ “Federal Resources for Tribal Economic Development,” Bureau of Indian Affairs, July 12, 2022, https://www.bia.gov/sites/default/files/dup/inline-files/oied_shared_ed_resource_directory_v1_7.12.22.pdf.

²³⁹ “Indian Economic Development: Relationship to EDA Grants and Self-determination Contracting Is Mixed,” U.S. Government Accountability Office, September 08, 2004, <https://www.gao.gov/assets/gao-04-847.pdf>.

fund vital infrastructure and other projects that could help lead to economic development.²⁴⁰ We discuss more about the specific opportunities and challenges of ARPA funding below.

American Rescue Plan Act (ARPA): Opportunity and Inequitable Funding

ARPA provides a case study in grant distribution for tribal programs. Under ARPA, \$20 billion dollars was allocated to all federally recognized American Indian and Alaska Native tribal governments. Under the act, Treasury developed a formula to quickly allocate funding to tribal governments because Native communities were disproportionately impacted by COVID-19. The resulting formula distributed an initial \$1 billion evenly divided among all tribes. Sixty-five percent of the remaining funding was allocated based on the number of tribal citizens that tribes served, and 35% was based on the number of employees on reservations prior to the COVID-19 pandemic.²⁴¹ While this plan allowed for speed in the allocation of \$20 billion, the funding was disproportionately distributed, and as much as \$880,000 per tribal citizen went to already wealthy tribes, while tribes with higher poverty rates received less than \$10,000 per tribal citizen.²⁴² Future efforts to efficiently distribute grant money will need to improve upon this system to better track inequities and prioritize tribes with higher levels of need.

Loans and Leveraging Sources

Loan sources on reservation lands include government-backed loan guarantee programs, existing tribal capital from various revenue sources, and private capital loans. Government loan guarantee programs help extend low-interest credit to traditionally underserved communities or businesses and promote homeownership and wealth-building.

Federal Loan Guarantee Sources

Federal loan guarantee programs can help promote lending in Indian Country by providing lenders with security to approve loans or lines of credit. Federal loan guarantee programs have reportedly been underutilized by eligible parties due to stringent credit requirements, specific location requirements, high closing costs associated with mortgage loans, and loan limits that may discourage use for larger projects.²⁴³

Many agencies that offer grants for economic development activities also offer loan guarantee programs for similar activities. For example, the USDA offers both grants and loan guarantees

²⁴⁰ “EDA ARPA Plan Programs: Indigenous Communities,” Bureau of Indian Affairs, accessed September 9, 2022, <https://www.bia.gov/service/whcnaa/eda-arpa-indigenous-communities>.

²⁴¹ Eric C. Henson, Miriam R. Jorgensen, Joseph P. Kalt, & Isabelle G. Leonaitis, “Assessing the U.S. Treasury Department’s Allocations of Funding for Tribal Governments under the American Rescue Plan Act of 2021,” Native Nations Institute, November 3, 2021, https://ash.harvard.edu/files/ash/files/assessing_the_u.s._treasury_departments_allocations_of_funding_for_tribal_governments.pdf.

²⁴² Ibid.

²⁴³ Kramer et al., “Assessment of the Housing Needs.”

for community facilities projects.²⁴⁴ The USDA Community Facilities Guaranteed Loan Program provides 80% loan guarantees of up to \$100 million for loans going towards community facilities including health care services, fire and public safety, community or cultural facilities, transportation facilities, utilities, and more.²⁴⁵ The USDA Business and Industry (B&I) Loan Guarantee Program guarantees 80% of loans under \$5 million, and 60% for loans over \$10 million.²⁴⁶

The Small Business Administration (SBA) provides two primary loan guarantee programs: The SBA 7(a) loan guarantee program helps small businesses obtain credit on reasonable terms and provides a guarantee of up to 85% for loans under \$150,000 and a 75% guarantee for loans up to \$5 million, while the SBA 504 Loan program provides additional low-interest loans of up to \$5 million through the SBA.^{247,248} The BIA Loan Guarantee and Insurance Program provides loan guarantees for Native individuals and organizations funding projects that will benefit the economy of a reservation or tribal service area.²⁴⁹

HUD and the USDA also have loan guarantee programs targeted towards individual homeownership (USDA 502 and HUD Section 184) that help build intergenerational wealth through homeownership opportunities.²⁵⁰ HUD's program is specifically for American Indian and Alaska Native borrowers, and can be used for the new construction, rehabilitation, purchase, or refinancing of a one to four unit home on or off Native lands.²⁵¹ Homeownership programs can promote community economic development by supporting private development enterprises, growing intergenerational wealth through asset ownership, and increasing housing options for workers.

The CDFI Fund provides a Bond Guarantee Program that can help CDFIs access capital. Through this program, CDFIs (including Native CDFIs) can issue federally guaranteed bonds and use their proceeds to extend credit for community development purposes. Through fiscal

²⁴⁴ "All Programs."

²⁴⁵ "Community Facilities Guaranteed Loan Program," U.S. Department of Agriculture, accessed September 13, 2022, <https://www.rd.usda.gov/programs-services/community-facilities/community-facilities-guaranteed-loan-program>.

²⁴⁶ "Business & Industry Loan Guarantees," U.S. Department of Agriculture, accessed September 13, 2022, <https://www.rd.usda.gov/programs-services/business-programs/business-industry-loan-guarantees>.

²⁴⁷ "7(a) Loans," U.S. Small Business Administration, accessed September 9, 2022, <https://www.sba.gov/funding-programs/loans/7a-loans>.

²⁴⁸ "504 Loans," U.S. Small Business Administration, accessed September 9, 2022, <https://www.sba.gov/funding-programs/loans/504-loans>.

²⁴⁹ "Indian Loan Guarantee and Insurance Program (ILGP)," U.S. Department of the Interior Bureau of Indian Affairs, accessed September 13, 2022, <https://www.bia.gov/service/loans/ilgp>.

²⁵⁰ Kramer, et al., "Assessment of the Housing Needs."

²⁵¹ "Section 184 Indian Home Loan Guarantee Program," U.S. Department of Housing and Urban Development, accessed January 11, 2023, <https://www.hud.gov/section184>.

year (FY) 2022, more than \$ 2.1 billion had been guaranteed in bonds through the CDFI Bond Guarantee Program.²⁵²

Citizens Potawatomi Community Development Corporation, headquartered in Shawnee, Oklahoma, was the first Native CDFI to participate in the CDFI Bond Guarantee Program, receiving a \$16 million bond in 2015, with plans to use the bond loan to provide financing for large scale commercial real estate projects in the Citizens Potawatomi Nation.²⁵³

Using Existing Revenue Streams as Loan Collateralization

Since tribes often cannot use trust land as collateral for loans, a reliable revenue stream becomes very important in securing capital and better loan terms. Examples of potential revenue streams that may be used as collateral include reimbursement from health care facilities, successful hospitality operations, and Indian Housing Block Grant (IHBG) allocations that serve as collateral for HUD Title VI loans. Blackfeet Housing Authority's Glacier Heights Expansion project successfully leveraged a Title VI loan that used existing IHBG revenue streams as collateral to help cost-effectively develop 40 single-family homes.²⁵⁴ In this project, 19 units housed Native Veterans, which helped leverage additional future revenue streams, including Tribal HUD-VASH rental assistance and administrative fees. Other similar projects have been able to collateralize IHBG funding and other consistent revenue sources.

Tax Incentives

Tax credits and other tax incentives can encourage economic development by offering tax benefits to investors in return for their investment in specific types of economic development projects. Tax credits allow taxable entities to subtract the amount of the credit from their owed taxes.²⁵⁵ Other types of tax incentives include tax abatement and tax exemptions.

The Low-Income Housing Tax Credit (LIHTC) is a major tax incentive program for affordable housing and community development projects, and is often used in Native projects. During site visits conducted as part of a HUD tribal housing study, LIHTC was the program most often mentioned by tribes in connection with leveraging funds and was used at nine of the 22 sites visited. Many tribes welcomed the opportunity to leverage funds for developing new housing — the White Earth Nation, for example, was working on its fifth LIHTC project at the time of the survey and noted that more investors and developers are interested in building with LIHTC tax

²⁵² “Agency Financial Report Fiscal Year 2022,” CDFI Fund, U.S. Department of the Treasury, accessed April 12, 2023, https://www.cdfifund.gov/sites/cdfi/files/2023-01/CDFI_Fund_FY22_AFR_FINAL508.pdf.

²⁵³ “Treasury Guarantees \$327 Million in Bond Funding for Projects in Low-Income Communities,” September 29, 2015, <https://www.cdfifund.gov/news/178>.

²⁵⁴ “ONAP National Best Practice Webinar: Featuring Blackfeet Housing,” Office of Native American Programs, March 4, 2020, <https://www.hud.gov/sites/dfiles/PIH/documents/National%20Webinar%20Blackfeet%20Housing%20HUDVASH%20FINAL.pdf>.

²⁵⁵ Troy Segal, “Tax Credit,” *Investopedia*, January 27, 2022, <https://www.investopedia.com/terms/t/taxcredit.asp>.

credit incentives. But others noted that many LIHTC projects require the availability of leveraged funds and involve complicated paperwork and application requirements, which can be difficult to meet. The Bad River Tribe appointed a project manager specifically for tax credits and American Reinvestment and Recovery Act (ARRA) projects because the application and compliance process required too much work for regular staff.²⁵⁶

The overwhelming need for affordable housing in Native communities makes it easier to demonstrate demand and attract investors. In contrast, for NMTC investments, it may be more difficult to demonstrate demand for various commercial and community facility projects. However, LIHTC does require tribes to accept limited partnerships with outside entities, limited waivers of sovereign immunity, extended compliance periods, and other perceived "intrusions" into their sovereignty and this experience can serve as a gateway to larger, more complex transactions using NMTCs.

The New Markets Tax Credit (NMTC) Program, established in 2000, helps economically distressed communities attract private capital by providing investors with a federal tax credit. The CDFI Fund allocates tax credit authority to Community Development Entities (CDEs) through a competitive application process. CDEs use their authority to offer tax credits to investors in exchange for equity in the CDE. Using the capital from these equity investments, CDEs can make loans and investments to businesses operating in low-income communities on better rates and terms and with more flexible features than the market. In exchange for investing in CDEs, investors claim a tax credit worth 39% of their original CDE equity stake, which is claimed over a seven-year period.²⁵⁷ The program supports activities as varied as schools, apartment buildings, arts centers, restaurants, food production facilities, buildings for human service providers, grain elevators, manufacturing plants, sustainable forestry, and more.

By design, the NMTC is a flexible tool that allows CDEs discretion over which projects they fund.²⁵⁸ A recent analysis of NMTC investments from 2001- 2019 conducted by researchers at the Center for Indian Country Development, identified a total of 54 NMTC investments that involved a tribal entity. Those projects were directed to 36 of the 347 federally recognized tribes in the contiguous United States, one Alaska Native Village Corporation, and two consortia of Alaska Native Villages.²⁵⁹ The report finds that “while the share of NMTC investments involving tribal entities is increasing, the total number of tribes involved remains small, and the

²⁵⁶ Pindus, et al., “Housing Needs of American Indians,” 143-145.

²⁵⁷ “New Markets Tax Credit Program Fact Sheet,” CDFI Fund, U.S. Department of the Treasury, accessed December 12, 2022, <https://www.cdfifund.gov/sites/cdfi/files/documents/nmtc-fact-sheet-english-16sept2020-final.pdf>.

²⁵⁸ Brett Theodos, Christina Plerhoples Stacy, Daniel Teles, Christopher Davis, and Ananya Hariharan, (Washington, DC: Urban Institute, April 2021. https://www.urban.org/sites/default/files/publication/103956/which-types-of-projects-receive-new-markets-tax-credit-funding_0.pdf Accessed December 20, 2021.

²⁵⁹ Matthew Gregg, Michou Kokodoko, and Elijah Moreno, “Take-up of New Markets Tax Credit Increases in Indian Country, With Potential for Far More, Federal Reserve Bank of Minneapolis, May 10, 2022, <https://www.minneapolisfed.org/article/2022/take-up-of-new-markets-tax-credit-program-increases-in-indian-country-with-potential-for-far-more>.

number of financial intermediaries directing NMTC investments to tribal entities is even smaller.”²⁶⁰

There are other tax incentives aimed at attracting investment capital such as Opportunity Zones and renewable energy credits. The Tax Cuts and Jobs Act of 2017 included a federal incentive—Opportunity Zones—to spur investment in undercapitalized communities. Local areas (defined by census tracts) were eligible for selection as Opportunity Zones if they are Low Income Communities (LICs) under the high poverty or low median income definitions established for the New Markets Tax Credit program. Also eligible for selection were census tracts contiguous to LICs if median family income did not exceed 125% of the qualifying tract. About 56% of tracts in the United States were eligible for selection as Opportunity Zones and of these, governors selected over 8,700 zones, roughly 12% of tracts. Corporations and individuals that invest capital in Opportunity Zones defer or reduce taxes on capital gains.²⁶¹

Governors in 26 states named census tracts that include tribal areas. Of the 1,341 census tracts eligible for selection in tribal areas, 30% were selected. This, of course, is a first step as these areas need to attract investors and a tract being designated a zone does not ensure it will access Opportunity zone capital.²⁶² But for the 360 designated opportunity zones on rural lands in Indian Country, with 90 in Oklahoma and 70 in Alaska, the picture is bleak. Because of an oversight in the federal law, tribal governments cannot form or participate in Opportunity Funds and thus cannot pool investments from external sources.²⁶³ The law allows territories like Guam and American Samoa to set up opportunity funds, but tribal governments were not given the same status. The Opportunity Zones Program is still relatively new and reporting is limited, so its potential, especially in Indian Country, remains to be seen.

The Inflation Reduction Act of 2022 allows state, local, and tribal governments, as well as nonprofit organizations and other tax-exempt entities, such as rural electric cooperatives, to receive certain tax credits as direct payments from the Internal Revenue Service as an incentive to continue making investments to build a clean energy economy.²⁶⁴

²⁶⁰ Gregg, Kokodoko, and Moreno, “Take-up of New Markets Tax Credit,” 1.

²⁶¹ Brett Theodos, Brady Meixeil, and Carl Hedman, “Did States Maximize Their Opportunity Zone Selections?” May 18, 2018, revised July 18, 2018, https://www.urban.org/sites/default/files/publication/98445/did_states_maximize_their_opportunity_zone_selections_7.pdf.

²⁶² Nancy Pindus and Brady Meixeil, “Why Opportunity Zones are Important for Indian Country,” June 7, 2018, <https://www.urban.org/urban-wire/why-opportunity-zones-are-important-indian-country>. Note: This analysis included all Opportunity Zone tracts that had been approved by Treasury as well as proposed tracts awaiting approval as of publication date.

²⁶³ Paul Monies. “Tribes Shut Out of Opportunity Zone Deals.” March 26, 2019, <https://nondoc.com/2019/03/26/tribes-shut-out-of-opportunity-zone-deals/>

²⁶⁴ “Fact Sheet: Four Ways the Inflation Reduction Act’s Tax Incentives Will Support Building an Equitable Clean Energy Economy,” U.S. Department of the Treasury, 2022, <https://home.treasury.gov/system/files/136/Fact-Sheet-IRA-Equitable-Clean-Energy-Economy.pdf>.

Another tax incentive financing tool is tax-exempt bonds. Tribal Economic Development Bonds (TED Bonds), created by the ARRA, have been one of the broadest and most flexible forms of tribal tax-exempt bonds. They are not fully subject to the limits that typically affect tribal government's use of tax-exempt funds for the financing of "essential government functions."²⁶⁵ However, the tool has limitations: gambling establishments are excluded and projects must be located on tribal land, to name a few. TED Bonds were funded at \$2 billion in 2009.²⁶⁶ Issuance of tribal economic development bonds is subject to a national volume cap for all such bonds and a Published Volume Cap Limit for the aggregate amount of national volume cap that may be allocated per Indian tribal government. As of May 2, 2023, the amount of remaining available national volume cap was \$0. The Published Volume Cap Limit per Indian tribal government is \$100,000,000 and does not change. While no new Tribal Bond funding is available, there may be national volume cap available in the future if previously allocated volume cap is forfeited.²⁶⁷

While the issuance of bonds is a promising source of capital—since the bonds can attract investors and enable tribes to borrow funds at a reduced interest rate—they also come with administrative and compliance issues. If you are a tribal applicant, you must apply for an allocation of bonds that specifies what the capital will be used for, the cost of the project or projects, a financing plan, and outside documentation that the bonds will be marketable. Not all tribes that received allocations were able to use them due to delays in projects, difficulties obtaining loans, or selecting other financing options. Allocations that are not deployed within 180 days are returned to the Treasury.²⁶⁸

Initial demand for TED Bonds in their early years was slow, though activity has picked up in subsequent years. The first tranche of allocations to 58 applicants totaled just under \$1 billion with allocations ranging from \$1.5 million to \$22.4 million. The second tranche of allocations totaled just over \$1 billion with allocations to 76 applicants ranging from \$2.7 million to \$30 million.²⁶⁹ As of August 1, 2022 the remaining available national volume cap was about \$63 million.²⁷⁰ Gregg et al. comment that "the allocation pool has been effectively exhausted," pointing out that there is no shortage of potential investments and there is a need to continue this program or provide other ways to provide greater tax parity between states and tribes.²⁷¹

²⁶⁵ "Treasury Department Fact Sheet: Tribal Economic Development Bonds," U.S. Department of the Treasury, 2014, <https://www.irs.gov/pub/irs-tege/Tribal%20Economic%20Development%20Bonds%20Fact%20sheet%202014.pdf>.

²⁶⁶ "Treasury Department Fact Sheet: Tribal Economic Development Bonds."

²⁶⁷ "Published Volume Cap Limit for Tribal Economic Development Bonds," Internal Revenue Service, U.S. Department of the Treasury, last updated May 4, 2023, <https://www.irs.gov/tax-exempt-bonds/published-volume-cap-limit-for-tribal-economic-development-bonds>.

²⁶⁸ Ibid.

²⁶⁹ "IRS Announces Tribal Economic Development Bonds Allocations," Internal Revenue Service, last updated February 2, 2022, <https://www.irs.gov/tax-exempt-bonds/irs-announces-tribal-economic-development-bonds-allocations>.

²⁷⁰ "Published Volume Cap Limit for Tribal Economic Development Bonds."

²⁷¹ Matthew Gregg, Ryan Nunn, and Casey Lozar, "An Urgent Priority: Accurate and Timely Indian Country Data," Federal Reserve Bank of Minneapolis, May 10, 2022, <https://www.minneapolisfed.org/article/2022/an-urgent-priority-accurate-and-timely-indian-country-data>.

Programs Incentivizing or Promoting Tribal Community Economic Development

The Small Business Association (SBA)’s 8(a) Business Development Program is a nine-year program that provides management, technical, financial, and procurement assistance to firms owned or controlled by socially and economically disadvantaged individuals.²⁷² There are also special exceptions in the law that govern enterprises owned by Alaska Native corporations, tribes, Native Hawaiian organizations, and CDCs. These entities may have multiple 8(a) firms, but for most firms and individuals, participation is one time only.

Once certified, participating businesses can compete for certain federal sole-source and competitive set-aside contracts. Up to \$7.5 million in sole-source contracts is authorized for assigned manufacturing North American Industry Classification System codes, and \$4.5 million for all other acquisitions.²⁷³ Alaska Native corporations have been particularly successful at leveraging 8(a) status into productive contracts. A 2007 GAO report found that obligations for 8(a) contracts to ANC firms increased from \$265 million in FY 2000 to \$1.1 billion in 2004.²⁷⁴

Table 1 | Summary List of Federal Funding Sources

1.1 Bureau of Indian Affairs

Agency/ Program	Funding Type	Eligibility	Authorized Purposes	Typical Amounts
Indian Business Incubators Program	Grants	Indian entities; tribal organizations; tribal colleges or universities; institute of higher education in any state admitting students as per 20 U.S.C. 1091(d); joint applicants who are independently eligible	Establish and run business incubators that serve entrepreneurs who will provide products or services in American Indian and Alaska Native communities.	\$100,000-\$300,000 ²⁷⁵

²⁷² “8(a) Business Development program,” U.S. Small Business Administration, accessed September 13, 2022, <https://www.sba.gov/federal-contracting/contracting-assistance-programs/8a-business-development-program>.

²⁷³ “8(a) Business Development program.”

²⁷⁴ Katherine V. Schinasi, “Alaska Native Corporations: Increased Use of Special 8(a) Provisions Calls for Tailored Oversight,” U.S. Government Accountability Office, September 19, 2007, <https://www.gao.gov/assets/gao-07-1251t.pdf>.

²⁷⁵ “Indian Business Incubators Program,” Bureau of Indian Affairs, accessed September 6, 2022, <https://www.bia.gov/service/grants/ibip>.

Agency/ Program	Funding Type	Eligibility	Authorized Purposes	Typical Amounts
Indian Loan Guarantee and Insurance Program	Loan Guarantee and Insurance	Most lending institutions, including CDFIs, may obtain a guarantee or insurance; non-bank lenders may be eligible to access guarantees. Borrowers must be an enrolled member of a federally recognized tribe or group; or a business entity owned by federally recognized AIAN individuals	Loans may be used for a variety of purposes including operating capital, equipment purchases, acquisition and refinancing, building construction, and lines of credit. The project must benefit the economy of a reservation or tribal service area.	In 2000, the average loan guarantee was \$7 million. ²⁷⁶ In addition, lenders issued insured loans at an average amount of just over \$57,000
Living Languages Grant Program	Grant	Federally recognized tribal governments	Funding to document and revitalize languages that are at risk of disappearing because of a declining native-speaker population.	\$150,000 to \$200,000 ²⁷⁷
National Tribal Broadband Grant	Grant	Federally recognized tribal governments	Developing or extending broadband services in communities to spur economic development and commercial activity, create opportunities for self-employment, enhance educational resources and remote learning opportunities, and meet emergency and law enforcement needs. ²⁷⁸	\$100,000 - \$175,000 ²⁷⁹

²⁷⁶ “Indian Loan Guarantee and Insurance Program,” Bureau of Indian Affairs, accessed December 28, 2022, <https://www.bia.gov/service/loans/ilgp/what-indian-loan-guarantee-and-insurance-program-ilgp>.

²⁷⁷ “Past Funded LLGP Grant Projects,” Bureau of Indian Affairs, accessed August 24, 2022, <https://www.bia.gov/service/grants/llgp/past-funded-llgp-grant-projects>.

²⁷⁸ “National Tribal Broadband Grant (NTBG),” Bureau of Indian Affairs, accessed August 24, 2022, <https://www.bia.gov/service/grants/ntbg>.

²⁷⁹ “Past Funded NTBG Grant Projects,” Bureau of Indian Affairs, accessed August 24, 2022, <https://www.bia.gov/service/grants/ntbg/past-funded-ntbg-grant-projects>.

Agency/ Program	Funding Type	Eligibility	Authorized Purposes	Typical Amounts
Native American Business Development Institute Grant	Grant	Tribes and tribal organizations	Funds go to hiring consultants to perform feasibility studies or business plans to help tribes and tribal organizations weigh their risks to determine whether a project is worth pursuing and empowers them to make informed decisions about their economic futures. All projects must be completed within one year.	\$25,000- \$40,000 ²⁸⁰
Tribal Tourism Grant Program	Grant	Tribes or organizations	Hiring consultants, preparing project feasibility studies, and expanding or developing tourism business plans, awarded tribes and organizations can leverage grant funding to explore COVID-19 recovery options.	\$25,000 - \$150,000

1.2 U.S. Department of Agriculture

Agency/Program	Funding Type	Eligibility	Authorized Purposes	Typical Amounts
Business and Industry Loan Guarantees	Loan guarantee	For-profit or nonprofit businesses, cooperatives, federally recognized tribes, public bodies, individuals engaged or proposing to engage in a business	Business development activities, business acquisition, land acquisition for commercial or industrial properties, the purchase and installation of machinery and equipment, supplies or inventory, debt refinancing.	\$25 million loan maximum, 80% loan guarantee in 2022. ²⁸¹
Community Facilities Grants	Grant	Organizations and tribes in cities, towns, unincorporated areas with less than 20,000 individuals	Nonprofit public improvement projects, including real estate and equipment projects.	\$15,000 - \$50,000 ²⁸²

²⁸⁰ “Past Funded NABDI Grant Projects,” Bureau of Indian Affairs, accessed September 6, 2022, <https://www.bia.gov/service/grants/nabdi/past-funded-nabdi-grant-projects>.

²⁸¹ “OneRD Guarantee Loan Initiative Lender Guide,” U.S. Department of Agriculture, November 4, 2020, <https://www.rd.usda.gov/sites/default/files/OneRDLenderGuide.pdf>.

²⁸² Ibid.

Agency/Program	Funding Type	Eligibility	Authorized Purposes	Typical Amounts
Community Facilities Guaranteed and Direct Loans	Loans and loan guarantees	Organizations and tribes in cities, towns, unincorporated areas with less than 20,000 individuals	Nonprofit public improvement projects, including real estate and equipment projects.	\$100,000 - \$5 million ²⁸³
Intermediary Relending Program	Loan	Nonprofits, federally recognized tribes, public agencies, cooperatives	Provides 1% low-interest loans to local lenders that re-lend to businesses to improve economic conditions and create jobs in rural communities.	Up to \$1 million for local lenders; up to \$400,000 to ultimate recipient ²⁸⁴
ReConnect	Loan or grant	Tribes or organizations	Construction, improvement, or acquisition of facilities and equipment to provide broadband service in eligible rural areas. ²⁸⁵	\$25 million - \$50 million ²⁸⁶
Rural Business Development Grants	Grant	Public bodies, government entities, nonprofit entities, and federally recognized tribes	Technical assistance and training for small rural businesses.	\$10,000 - \$500,000 ²⁸⁷
Rural Innovation Stronger Economy (RISE) Grant	Grant	Nonprofit entities, state entities, tribal entities, institutions of higher education, public bodies	Building or supporting a business incubator, providing worker training for new or higher-paying jobs.	\$500,000 - \$2,000,000 ²⁸⁸

²⁸³ “Housing Support Programs Across the Federal Government.”

²⁸⁴ “Intermediary Relending Program,” U.S. Department of Agriculture, accessed April 11, 2023, <https://www.rd.usda.gov/programs-services/business-programs/intermediary-relending-program>.

²⁸⁵ “ReConnect Loan and Grant Program,” U.S. Department of Agriculture, accessed August 24, 2022, <https://www.usda.gov/reconnect>.

²⁸⁶ Ibid.

²⁸⁷ “Rural Business Development Grants (RBDG),” U.S. Department of Agriculture, December 2019, https://www.rd.usda.gov/sites/default/files/fact-sheet/508_RD_FS_RBS_RBDG.pdf.

²⁸⁸ “Rural Innovation Stronger Economy (RISE) Grants,” U.S. Department of Agriculture, accessed April 11, 2023, <https://www.rd.usda.gov/programs-services/business-programs/rural-innovation-stronger-economy-rise-grants>.

Agency/Program	Funding Type	Eligibility	Authorized Purposes	Typical Amounts
Rural Microentrepreneur Assistance Program	Loan or grant	Nonprofits, federally recognized tribes, institutions of higher education	Provides loans and grants to Microenterprise Development Organizations (MDOs), which can then provide loans and technical assistance to small rural businesses.	Up to \$500,000 for MDOs, up to \$50,000 for ultimate recipients. ²⁸⁹
Section 502 Direct Loan Program	Loan	Low-income homebuyers in rural areas	Purchase homes in rural areas; build, repair, renovate or relocate a home; or purchase and prepare sites.	Loan limits vary by county, typically below \$500,000 for a 1-unit property. ²⁹⁰

1.3 U.S. Department of Health and Human Services

Agency/Program	Funding Type	Eligibility	Authorized Purposes	Typical Amounts
Social and Economic Development Strategies (SEDS) Grants	Grant	Federally recognized tribal governments, tribal organizations, nonprofits	Community-driven projects designed to grow local economies, strengthen Native American families, preserve Native American cultures, and strengthen community-based businesses and social and economic infrastructure in Native American communities.	\$100,000 - \$400,000 ²⁹¹

²⁸⁹ “Rural Microentrepreneur Assistance Program,” U.S. Department of Agriculture, accessed April 11, 2023, <https://www.rd.usda.gov/programs-services/business-programs/rural-microentrepreneur-assistance-program>.

²⁹⁰ “Single Family Housing Direct Home Loans,” U.S. Department of Agriculture, accessed April 11, 2023, <https://www.rd.usda.gov/programs-services/single-family-housing-programs/single-family-housing-direct-home-loans>.

²⁹¹ “Social and Economic Development Strategies -SEDS,” U.S. Department of Health and Human Services, April 6, 2021, <https://www.grants.gov/web/grants/view-opportunity.html?oppId=329546>.

1.4 U.S. Department of Housing and Urban Development

Agency/Program	Funding Type	Eligibility	Authorized Purposes	Typical Amounts
Indian Community Development Block Grant	Grant	Federally recognized tribes/villages, limited state-recognized tribes and tribal organizations	Housing, community facilities, and other economic development activities. ²⁹²	\$500,000 - \$1.2 million ²⁹³
Indian Housing Block Grant	Grant	Federally recognized tribes/villages, limited state-recognized tribes	Affordable housing development, assistance, services, and problem solving; safety and crime prevention. ²⁹⁴	\$86,000 - \$650 million (dependent on tribe size and need) ²⁹⁵
Section 184 Indian Home Loan Guarantee Program	Loan guarantee	American Indians or Alaska Natives who are members of a federally recognized tribe, federally recognized Indian tribes, tribally designated housing entities, Indian Housing Authorities	New home construction or rehabilitation, the purchase of an existing home, or refinancing, both on and off Native lands. Can be used for homes with between one and four units.	Loan limits vary by county, typically below \$500,000 for a 1-unit property ²⁹⁶

1.5 U.S. Department of the Treasury

Agency/Program	Funding Type	Eligibility	Authorized Purposes	Typical Amounts
CDFI Bond Guarantee Program (CDFI Fund)	Bond Guarantee	CDFIs, including Native CDFIs	Enables CDFIs to issue federally guaranteed bonds and use their proceeds to extend credit for community development.	Through FY 2019, nearly \$1.6 billion had been guaranteed in bonds through the CDFI Bond Guarantee Program ²⁹⁷

²⁹² “Indian Community Development Block Grant Program.”

²⁹³ “FY 2021 Indian Community Development Block Grant,” U.S. Department of Housing and Urban Development, accessed August 24, 2022, <https://www.hud.gov/sites/dfiles/PA/documents/ICDBG-Competitive-Awards-2022.pdf>.

²⁹⁴ “Indian Housing Block Grant Program.”

²⁹⁵ “Housing Support Programs Across the Federal Government,” U.S. Department of Agriculture, September, 2016, <https://www.usda.gov/sites/default/files/documents/housing-support-programs-federal-government.pdf>.

²⁹⁶ “Section 184 Indian Home Loan Guarantee Program.”

²⁹⁷ “Fact Sheet: CDFI Bond Guarantee Program.”

Agency/Program	Funding Type	Eligibility	Authorized Purposes	Typical Amounts
Native American CDFI Assistance Program (NACA, CDFI Fund)	Grant	Competitive process; Native CDFIs	Facilitates the creation and advancement of Native CDFIs. Serves organizations in the early planning stages of CDFI formation; tribal entities working to certify an existing lending program; and established Native CDFIs in need of further capacity-building assistance.	FY 2022: Technical Assistance \$125,000 - \$150,000 Financial Assistance \$197,000-\$1,000,000 ²⁹⁸
New Markets Tax Credit Program (CDFI Fund)	Tax credit	Competitive process; CDFI-certified Community Development Entities (CDEs) receive authority to issue tax credits	CDEs offer loans, equity investments, and other services to Qualified Low Income Community Businesses in a wide variety of industries including manufacturing, food, retail, housing, health, technology, energy, education, and child care. ²⁹⁹	Leveraged funding varies by type of project, but typically range from \$1-20 million ³⁰⁰
Low Income Housing Tax Credit (IRS)	Tax credit	Developers producing affordable housing throughout the U.S.	Affordable rental housing development.	\$1 million - \$2 million ³⁰¹
Tribal Economic Development Bonds (TED Bonds) (IRS)	Tax exempt bonds that can be issued by tribal governments	Federally recognized tribal governments	To finance any project or activity for which state or local governments could issue tax-exempt bonds. For example, TED Bonds could be used to finance water treatment facilities, sewage facilities, solid waste disposal facilities, and qualified residential facilities.	Volume cap limit per tribal government for the two-month period starting August 1, 2022, was \$100,000,000. ³⁰²

²⁹⁸ “NACA Program Award Book,” CDFI Fund, U.S. Department of the Treasury, 2022, https://www.cdfifund.gov/sites/cdfi/files/2023-02/2022_NACA_Award_Book.pdf.

²⁹⁹ “New Markets Tax Credit,” CDFI Fund, U.S. Department of the Treasury, accessed December 28, 2022, <https://www.cdfifund.gov/programs-training/programs/new-markets-tax-credit>.

³⁰⁰ CDFI Fund, *FY 2022 NMTC Public Data Release: 2003-2020 Data File*, (October 6, 2022), distributed by CDFI Fund, <https://www.cdfifund.gov/documents/data-releases>.

³⁰¹ “2022 QAPs and Applications,” Novogradac, accessed August 24, 2022, <https://www.novoco.com/resource-centers/affordable-housing-tax-credits/2022-qaps-and-applications>.

³⁰² “Published Volume Cap Limit for Tribal Economic Development Bonds.”

1.6 U.S. Economic Development Administration

Agency/Program	Funding Type	Eligibility	Authorized Purposes	Typical Amounts
CARES Act Economic Recovery Corps and Equity Impact Investments Programs	Grant	Local and state governments, Native tribal governments, 501(c)(3) nonprofits	Two programs designed to support underserved communities across the country in developing successful economic plans and projects.	\$3 million - \$30 million ³⁰³
Build to Scale	Grant	States, local governments, tribes, nonprofit organizations, higher education institutions, public-private partnerships, research organizations, venture development organizations, economic development organizations	Projects aimed at furthering tech-based economic development initiatives.	Between \$300,000 and \$2 million ³⁰⁴
Public Works and Economic Adjustment Assistance	Grant	District Organizations of Economic Development Districts, federally recognized tribes and any Alaska Native Village or Regional Corporations, state and local governments, institutions of higher education, public or private nonprofit organizations	A wide range of technical, planning, and public works and infrastructure assistance in regions experiencing adverse economic changes.	\$100,000 - \$30,000,000 ³⁰⁵

³⁰³ “CARES Act Economic Recovery Corps and Equity Impact Investments,” U.S. Economic Development Administration, accessed August 24, 2022, <https://www.grants.gov/web/grants/view-opportunity.html?oppId=341163>.

³⁰⁴ “2022 Build to Scale Program Notice of Funding Opportunity,” U.S. Economic Development Administration, May 2022, <https://www.eda.gov/sites/default/files/2022-05/FY22-Build-to-Scale-NOFO.pdf>.

³⁰⁵ “FY 2023 EDA Public Works and Economic Adjustment Assistance Programs,” U.S. Department of Commerce, March 14, 2023, <https://www.grants.gov/web/grants/view-opportunity.html?oppId=346815>.

Agency/Program	Funding Type	Eligibility	Authorized Purposes	Typical Amounts
Indigenous Communities Program	Grant	Tribes or nonprofits serving Native Hawaiians or Pacific Islanders	Develop projects to recover from the pandemic and build economies.	\$100,000 - \$5,000,000 ³⁰⁶
Planning and Local Technical Assistance Program	Grant	Individual and consortia of: local and state governments, Native tribal governments, 501(c)(3) nonprofits, and higher education entities	Economic feasibility studies, impact analyses, disaster resiliency plans, and project planning.	\$100,000 ³⁰⁷

1.7 Small Business Administration

Agency/Program	Funding Type	Eligibility	Authorized Purposes	Typical Amounts
The SBA 7(a) Loan Guarantee Program	Loan guarantee	Small businesses	Helps small businesses obtain credit.	Guarantee of up to 85% for loans under \$150,000 and a 75% guarantee for loans up to \$5 million ³⁰⁸
SBA 504 Loan Program	Loan	For-profit company	Long-term, fixed rate financing for major fixed assets that promote business growth and job creation.	Up to \$5.5 million ³⁰⁹

Private Capital and Investment

Despite progress being made in tribal economic development, for many tribes there are inherent tensions in working with non-Native investors. While the influx of private capital holds the

³⁰⁶ “Funding Opportunities.”

³⁰⁷ “Funding Opportunities,” Economic Development Agency, accessed August 24, 2022, <https://eda.gov/funding-opportunities>.

³⁰⁸ “7(a) Loans.”

³⁰⁹ “504 Loans.”

potential to expand tribal economies and allow tribal governments to improve services to residents, the interests of investors may not align with tribes' self-determined goals.³¹⁰

In addition, as discussed in Section 3, many investors still hold biases and misperceptions concerning the riskiness of lending to Native borrowers. Jorgensen recommends that non-tribal providers of capital and credit educate themselves about the business-related infrastructure of tribes with whom they work, and that tribes and other advocates take the lead in such education. In some cases, Jorgensen points out that the reduced flow of funding can be understood as a symptom of some Native nations' limited preparedness to engage with lenders and lending institutions.³¹¹ The use of Native CDFIs or other Native financial institutions as intermediaries can also help make connections and ease uncertainties between parties. Access to credit lags in tribal areas that have a dearth of financial institutions, a lack of diversity of funding sources, and less access to collateral and equity resources. Successful examples of projects financed with private capital are discussed in Section 4 and others are included below in the subsection on capital stacking.

A 2013 survey of home mortgage lenders, Native CDFIs and credit unions, and other organizations serving Indian Country provides some insights into the motivations behind private lending in Indian Country. Tribally owned mortgage lenders were primarily motivated by their ability to serve their own people. Other lenders were motivated to provide mortgages to a traditionally underserved population, but mortgage lending on Native lands itself was not expected to be especially profitable because of the lengthy time to close loans and their relatively modest dollar amount.³¹²

Some lenders hoped their presence and service to Native homeowners would achieve greater economic returns from future long-term business opportunities, such as business loans to tribes, especially to tribes that operated casinos or other business activities requiring capital for investment. Lender respondents noted the importance of being visible within the Native community, for example by sending representatives to community events and meeting with groups to make sure tribal members are aware of what the lender has to offer.³¹³

Role and Potential of Philanthropy

Philanthropies and foundations offer a wide variety of opportunities for community organizations and other entities to access funding. But Native American nonprofit leaders report having less positive experiences with foundation funders than do nonprofit leaders of other races and ethnicities. Native nonprofit leaders cite similar challenges to those that arise when partnering with private investors, including difficulties building relationships and a lack of understanding on the part of foundations. In a 2021 survey, almost two thirds of foundation

³¹⁰ Fredericks and Finn, "Harnessing Private Equity."

³¹¹ "Access to Capital."

³¹² Listokin et al., "Mortgage Lending on Tribal Land."

³¹³ Ibid.

leaders said that they provide little or no grant dollars to organizations primarily serving Native American communities.³¹⁴

Native-serving nonprofits, such as the First Nations Development Institute, Native Americans in Philanthropy, NDN Collective, and Native Ways Foundation, have urged foundations to take actions to better support their communities, including participating in their organization's meetings and events, conducting site visits, being more communicative, and hiring Native American staff. Several of these nonprofits have developed resource materials that are available to foundations to learn more about working effectively with Native American leaders and communities.³¹⁵

Generally, Native American communities and causes are underfunded relative to their share of the population: A 2019 report found that large U.S. foundations provided just 0.4% of their funding towards Native American communities and causes even though 2% of the total population of the United States is American Indian and Alaska Native.³¹⁶ Between 2006 to 2022, a total of 53,513 grants from over 6,000 large funders were designed to benefit American Indian, Alaska Native and Native Hawaiian populations in the United States. These grants totaled \$3.8 billion, and were granted to 5,748 organizations.

Top funders that provided more than \$100 million in grants each to Native communities over this period include the Ford Foundation, W.K. Kellogg Foundation, The Robert Wood Johnson Foundation, Northwest Area Foundation, Novo Foundation, and Bush Foundation. The top project categories funded by foundation grants in Native communities include education, human rights, arts and culture, and community and economic development.

The outlook for philanthropic investments in Native communities appears to be improving. The Johnson Center for Philanthropy reports that “philanthropy is entering a new era of engagement with Native communities.”³¹⁷ Events in recent years such as the stand-off at Standing Rock and the racial reckonings of 2020 have brought an increased awareness in the philanthropic community of the unique experiences, strengths, and challenges faced by Native American communities.³¹⁸ MacKenzie Scott's philanthropic efforts, both in their scale and hands-off approach, are influencing the philanthropic landscape.³¹⁹

³¹⁴ Ellie Buteau, Hannah Martin, and Katarina Malmgren, “Overlooked (Part Two): Foundation Support for Native American Leaders and Communities,” Center for Effective Philanthropy, 2021, http://cep.org/wp-content/uploads/2021/07/CEP_Overlooked_Native_American.pdf.

³¹⁵ Buteau, Martin, and Malmgren, “Overlooked (Part Two).”

³¹⁶ Avi Bond, et al., “Investing in Native Communities: Philanthropic Funding for Native American Communities and Causes,” Candid, 2019, <https://www.issuelab.org/resources/35493/35493.pdf>.

³¹⁷ Trish Abalo, Adam Engwis, and Tory Martin, “Philanthropy is Entering a New Era of Engagement with Native Communities,” Dorothy A. Johnson Center for Philanthropy, January 18, 2022, 1, <https://johnsoncenter.org/blog/philanthropy-is-entering-a-new-era-of-engagement-with-native-communities/>.

³¹⁸ Abalo, Engwis, and Martin, “Philanthropy is Entering a New Era.”

³¹⁹ MacKenzie Scott, “Seeding by Ceding,” *Medium*, June 15, 2021, <https://mackenzie-scott.medium.com/seeding-by-ceding-ea6de642bf>.

In describing the selection process for her donations, MacKenzie Scott noted a focus on community-centered service. She and her advisors conducted research to identify and evaluate equity-oriented nonprofit teams working in areas that have been neglected. Furthermore, she chose to make relatively large gifts with no restrictions, trusting in the experience and judgment of organizations on the front line.³²⁰

Eight Native American and Alaska Native organizations focused on supporting indigenous higher education, philanthropy, and arts and culture received a portion of the \$2.74 billion in donations announced in June 2021 by MacKenzie Scott. These organizations are:

- American Indian College Fund, which gives scholarships to Native American students;
- American Indian Higher Education Consortium (AIHEC), a group representing tribal colleges;
- First Peoples Fund, a national nonprofit that supports Native artists and youth through entrepreneurship and cultural practice;
- Native Americans in Philanthropy, an organization that invests funding throughout Native communities;
- Native Arts & Cultures Foundation, which grants funding and mentorship to Native artists;
- NDN Collective, an indigenous-led organization supporting self-determination and movement building;
- Alaska Native Heritage Center, which works to preserve and strengthen Alaska Native languages, cultures and traditions; and
- Santa Fe, N.M.-based IAIA Museum of Contemporary Native Arts, the country's only art museum focusing on modern Native art.³²¹

Tribal colleges and cultural institutions are an important component of community economic development, for building the future workforce and for providing jobs to residents of Native communities. A 2013 report sponsored by the First Peoples fund found that an estimated 30% of Native peoples are practicing or potential artists, but many are living below the poverty level and lack the arts-specific business skills and training needed to operate successful art ventures. With

³²⁰ Scott, "Seeding by Ceding."

³²¹ Jenna Kunze, "Indigenous Nonprofits Included in Philanthropist MacKenzie Scott's Latest \$2.74B Round of Donations," *Tribal Business News*, June 15, 2021, <https://tribalbusinessnews.com/sections/economic-development/13526-indigenous-nonprofits-included-in-philanthropist-mackenzie-scott-s-latest-2-74b-round-of-donations>.

additional support, the Native arts economy “has the potential to expand dramatically, affecting not only the artists themselves, but their communities, as well.”³²²

At the same time, global efforts to address climate change are increasing recognition of the value of the cultural and historical knowledge of indigenous people.³²³ In September 2021, nine grantmakers signed on to the Protecting Our Planet Challenge. Their collective \$5 billion commitment to conservation efforts included a pledge to work closely and differently with indigenous communities going forward.³²⁴ At the United Nations Climate Change Conference (COP26) in November 2021, the United States and four other countries, in partnership with 17 funders, pledged to invest \$1.7 billion to help indigenous and local communities protect the biodiversity of tropical forests that are vital to protecting the planet from climate change, biodiversity loss, and pandemic risk.³²⁵ While much of this effort is directed at tropical rainforests, the overarching approach represents a change in the relationship of philanthropy to indigenous communities, including Native entities in the United States.

Capital Stacking

Jorgensen has documented examples of tribes successfully gaining access to capital and credit, including in the sectors of health care facilities, infrastructure projects (water and sewer, cellular towers and telecommunication equipment, broadband), grocery stores, and land purchases.³²⁶ Successful projects in each of these categories have used unique combinations of multiple sources of financing, such as tribal revenue; a tribal bond issue secured by a pledge of third-party billing revenues (for the health care facility); federal awards and grants from IHS, EPA, and USDA; loans from tribal banks and the USDA; and loans from several CDEs that raised investment capital through the NMTC program. While capital stacking is a common approach to funding community economic development within and outside of Native communities, these examples demonstrate how creative tribes must be to acquire the funding they need to build the communities they desire. These projects also demonstrate the importance of a reliable revenue stream to secure and repay loans, and that tribes and Native financial institutions and banks can realize benefits by building relationships and working together.

Capital stacking does not always bring in new private investment. During site visits for a HUD report on Native American and Alaska Native housing, tribes mentioned combining other federal

³²² “Establishing a Creative Economy,” First Peoples Fund, July 2013, 7, <https://static1.squarespace.com/static/57be24e9d1758e95b6146331/t/57c9d010c534a5aa98846fce/1472843798529/document-market-study.pdf>.

³²³ Abalo, Engwis, and Martin, “Philanthropy is Entering a New Era of Engagement.”

³²⁴ Jim Rendon, “\$5B Conservation Plan Offers New Approach, But Faces Hurdles,” AP News, September 28, 2021, <https://apnews.com/article/climate-change-science-business-philanthropy-oceans-6ca70181c532be88358cbedda72dce1e>.

³²⁵ “Governments and Private Funders Announce Historic US\$1.7 Billion Pledge at COP26 in Support of Indigenous Peoples and Local Communities,” Ford Foundation, November 1, 2021, <https://www.fordfoundation.org/news-and-stories/news-and-press/news/governments-and-private-funders-announce-historic-us-17-billion-pledge-at-cop26-in-support-of-indigenous-peoples-and-local-communities>.

³²⁶ “Access to Capital.”

funds, such as ICDBG funds, or tribal funds or land to support a project, in addition to their main funding source.³²⁷ Several tribes mentioned using the HUD Title VI Loan Guarantee program, which allows recipients of Indian Housing Block Grant Funds to use current and future fund allocations as a means of leverage to obtain HUD guaranteed financing. While combining funding sources can allow some projects to move forward, it can also impose an administrative burden: several site visit respondents mentioned the need to work with experts, hire additional staff, or obtain more training to improve their ability to leverage funding and combine multiple funding sources. In addition, many smaller tribes view leveraging as unfeasible because their recurring funding streams are small, limiting their ability to develop the project scale necessary to make other sources, such as LIHTC, work for them.

In 2021, Nesika Illahee, an affordable housing development in northeast Portland's Cully neighborhood, was completed using a unique partnership of federal, tribal, state, and local resources.³²⁸ Community Development Partners (CDP), the Native American Youth and Family Center (NAYA), and the Native American Rehabilitation Association (NARA) partnered with the Confederated Tribes of Siletz Indians (Siletz) to develop the project. The Siletz Tribe sponsored a portion of the project with its HUD IHBG funding. Twenty of the development's 59 units give first residential priority to Siletz tribal members and second priority to members of a federally or state-recognized tribe and Alaskan Natives. One goal of the project is to combat homelessness, which is experienced disproportionately by Native Americans relative to other county residents. It also aimed to foster a sense of belonging for tribal members in an urban setting through culturally specific design, services, and amenities. This project provides an interesting example of capital stacking that involves a tribe, but it is located in an urban area, which may bring other unique opportunities or challenges.

The Nesika Illahee development reflects the combination of funding sources and their requirements. Oregon Housing and Community Services (OHCS) granted 4% low-income housing tax credits, which required that the development accommodate households making no more than 60% of area median income. The tribe's IHBG funds supported 20 units that give first residential priority to Siletz tribal members and second priority to members of a federally or state-recognized tribe and Alaskan Natives. Since IHBG funds do not guarantee that renters will provide tribes and TDHEs with rental income, the development received additional support for these units, including \$1.5 million that will provide \$75,000 per year in rental subsidies over 20 years. The OHCS Mental Health Housing and General Housing Account programs funded 15 units that are set aside as recovery housing for tenants with substance use disorders. These residents receive additional support from NARA through drug and alcohol counseling. Located about a half-mile from the complex, NAYA serves families with children through wraparound services that provide food, clothes, and domestic violence interventions along with other forms of emergency assistance.

³²⁷ Pindus, et al., "Housing Needs of American Indians," 143.

³²⁸ "Innovative Funding Provides Culturally Specific Affordable Housing to Native Americans," PD&R Edge; U.S. Department of Housing and Urban Development, 2021, <https://www.huduser.gov/portal/pdredge/pdr-edge-inpractice-072621.html>.

All units contain ENERGY STAR® appliances and LED lighting. The OHCS Multifamily Energy Program (MEP) covered the costs of these energy-efficiency measures, which have reduced Nesika Illahee’s electricity use by nearly 50% and earned the development Platinum certification from Earth Advantage. OHCS also provided a loan through its Local Innovation and Fast Track rental housing program, bringing its total contribution to Nesika Illahee to more than \$10 million.

With Native American households making up 90% of its residents, Nesika Illahee is a culturally specific community whose design and amenities give residents a place to partake in tribal traditions at different scales, including virtual and oral storytelling using art pieces created by local and national Native American artists. Signage and murals provide a familiar cultural element for residents.

Section 8: Community Economic Development in Indian Country: Addressing Challenges and Moving Forward

This concluding section highlights opportunities and promising practices that can further economic resilience in Native lands and address the need for more and better data, including recommendations for future data collection.

To best support the community economic development aims of American Indians, Alaska Natives, and Native Hawaiians, it is essential to be aware of the challenges that have historically prevented Native communities from accessing opportunities, as well as the challenges that remain today. The objective of the CDFI Fund's NMTC Native Initiative is to support efforts to increase NMTC investment in NMTC Native Areas. This Market Research Report aims to increase knowledge and understanding of community and economic development strategies in Indian Country as one step toward increasing investments in NMTC Native Areas and other Native lands. A shared understanding of the following points is critical for moving forward:

- Opportunities exist for enhanced community economic development in Indian Country because of new federal funding, increased tribal capacity to plan projects, and the growing sophistication of Native CDFIs and other Native actors accessing capital.
- The need for more and better data underlies many limitations to community economic development in Indian Country.
- Understanding of and respect for cultural values is essential for future community economic development in Indian Country.

Opportunities for Community Economic Development in Indian Country

Although challenges remain, the community economic development capacities of tribal and other Native entities have improved over time and tribal governments and enterprises are well-positioned to pursue new opportunities for growth.

Increased federal funding, including ARRA (2009) and the CARES Act (2020), which included set-asides for Native communities, provided significant amounts of new, time-sensitive funding. When these funds needed to be deployed quickly, tribes gained experience prioritizing and structuring projects. The COVID-19 pandemic raised awareness of disparities in infrastructure, broadband, housing, and health care in tribal areas. Implementing projects to address these disparities has provided tribes with experience in addressing complex financing and land issues and working with non-Native outside investors.

Federal funding sources continue to provide opportunities for tribes and Native communities. GAO identified eight federal programs that are specifically for tribal entities and provided over \$930 million in grants and loan guarantees in FY 2017–2021. An additional 14 programs were identified that provide significant amounts to tribal entities but also to a wider range of eligible recipients, such as small businesses or local governments. However, the total amount of

assistance provided by these 14 programs to tribal entities is unknown because two of these agencies, SBA’s Office of Capital Access and USDA’s Farm Service Agency, do not analyze data to estimate obligations provided to tribal entities. GAO states that “estimating and reporting the amount of program obligations provided to tribal communities would allow federal agencies and decision makers, such as Congress, to better understand the reach of these programs and identify areas where tribal entities may need additional support.”³²⁹

Historically, the Community Reinvestment Act (CRA) has not been a strong incentive for banks to invest in Indian Country. Banks have some flexibility in setting their CRA assessment areas, but they have to include areas where they have branches and ATMs, as well as surrounding communities. Since reservations tend to be under-banked—in part because of population density issues—many banks do not include these areas as part of their CRA assessment areas, choosing instead to invest in other low- and moderate-income communities to obtain CRA credit. But recently proposed (2020) updates to Community Reinvestment Act (CRA) rules include some incentives for increased lending in Indian Country including:

- Specific measures aimed at spurring investments in tribal public safety, housing, education, health care, and communications infrastructure, as well as other community and economic development projects on tribal lands;
- Providing banks with CRA credit for serving tribal communities even when Indian Country falls outside their CRA assessment areas; and
- Creating CRA scoring incentives for banks that choose to do business in Indian Country.³³⁰

Since these rules are proposed and not final, they may face additional changes before potential adoption. It is too early to know whether a final version of these rules will have a significant impact on the number of entities involved in Native communities.

The growth of Native financial entities also presents opportunities for increased access to capital and credit in Indian Country. Native CDFIs, credit unions, and other tribal entities are beginning to develop and offer lending options specifically crafted for potential Native homeowners' incomes, employment status, expense loads, credit histories, and relative borrowing comfort levels. Native financial institutions have the opportunity to strengthen their impact and community support through the inclusion of services that will serve the unique needs of their clients. However, this is contingent on the ability of Native CDFIs to continually collaborate and work closely with both tribal governments and outside investors to be successful. According to a survey of mortgage lenders, a physical presence near Indian land and developing consistent,

³²⁹ “Tribal Economic Development: Action is Needed.”

³³⁰ “Community Reinvestment Act Proposed Rulemaking,” Board of Governors of the Federal Reserve System, August 24, 2022, <https://www.federalreserve.gov/consumerscommunities/community-reinvestment-act-proposed-rulemaking.htm>.

working relationships between tribes and financial actors is effective for improving tribal collaboration with non-tribal entities.³³¹

The details discussed in this report confirm that the pieces and players are in place to continue to build a pipeline of community economic development projects in Native communities. As described in Section 3, tribes have increased their land management and planning capacity, and as described in Section 6, Native actors are expanding the diversity and volume of their partnerships and access to capital. There are projects waiting to be done in Native communities in various stages of planning, review and approval, and funding. Opportunities lie in the growth of tribal enterprises and jobs in the sectors of natural resources extraction, manufacturing, construction, hospitality, and public sector projects such as health facilities and community centers. Native CDFIs and other financial entities serving Indian Country continue to search for ways to meet a growing demand for credit and capital, which will only continue to increase as Native economies and tribal capacities grow.

The Need for Better Economic Data Regarding Indian Country

There are glaring gaps in the available data necessary to support community economic development in Native lands, resulting from both a lack of relevant or accurate data being collected and restricted access to the data that do exist. This lack of critical data continues to hinder the attraction of capital to Indian Country, though several tribes, Native organizations, and local, state, and federal agencies are actively working to improve existing data sources and to create new ones.

Quality data on economic and community characteristics can be thought of as the “lingua franca of investors and policymakers”—necessary for attracting investment and facilitating policy change.³³² Despite this, the historical misuse of tribal data in non-economic contexts, “like the study of tribal health issues [without the consent of the tribal members participating in the study], has generated mistrust about sharing tribal data more broadly.”³³³ One concrete example of the consequences this mistrust has for tribes and tribal enterprises: In 2020, the federal government was unable to determine the total debt of tribally-owned enterprises, which left the government unable to determine sufficient levels of economic support for these entities during the COVID-19 pandemic.³³⁴

That sufficient data for community economic development is lacking in Indian Country is no secret. A 2012 report from the Board of Governors of the Federal Reserve System found that insufficient research and data and a lack of coordination of research efforts across federal

³³¹ Listokin et al., “Mortgage Lending on Tribal Land.”

³³² “The Role of Data in Building Vibrant Tribal Economies,” Financial Security Program, The Aspen Institute, November 30, 2022, <https://www.aspeninstitute.org/blog-posts/the-role-of-data-in-building-vibrant-tribal-economies>.

³³³ Ibid.

³³⁴ Ibid.

agencies were major impediments to the development of Native American economies.³³⁵ There are three primary data challenges facing Indian Country: “inadequate sample sizes, mismatched geographies, and unique data characteristics.”³³⁶ Inadequate sample size, resulting from the relatively small Native populations in many areas of the U.S., is the reason often cited for the exclusion of Native populations from national statistics reporting. Longitudinal datasets “often do not have a sufficient number of American Indians to conduct the standard analyses employed for other races,” due to the small relative size of the population.³³⁷ The data that is available from the U.S. Census Bureau’s Decennial Census, American Community Survey (ACS), and other surveys does not provide information about how individuals are doing over time, making it difficult to evaluate the impact of policies and programs aimed at improving economic and quality of life outcomes.³³⁸ Additionally, although the ACS does oversample in Native and tribal areas, the ACS has a smaller sample size than the 2000 decennial census long-form that it replaced and thus wider confidence intervals, particularly for smaller or more rural geographies seen in many tribal areas.

Some surveys and reports fail to incorporate American Indian, Alaska Native, or Other Pacific Islander as an available answer choice altogether. For example, the monthly Bureau of Labor Statistics Jobs Report did not publish monthly labor force estimates for Native Americans because of “issues around sample size,” before changing its policy in early 2022.^{339,340} Data collected on Native communities might also require unique attributes that are typically not collected in existing surveys, such as tribal affiliation and enrollment.³⁴¹

Geography becomes a challenge for accurate data collection in Native lands and service areas because “the geographic units used in many surveys do not line up precisely with Indian Country maps,” and conditions can vary dramatically just inside and just outside tribal-area borders.³⁴² Tribal lands and Native communities often cross other political boundaries, including county and state boundaries, and adjacent non-Native communities may exhibit very different characteristics that may obscure real needs and opportunities or even prevent tribes and Native entities from being eligible for certain grants, tax credit programs, and other community economic development incentive programs. Furthermore, while data may be available at a county or

³³⁵ “Growing Economies in Indian Country: Taking Stock of Progress and Partnerships,” Board of Governors of the Federal Reserve System, April 2012, <https://www.federalreserve.gov/newsevents/conferences/GEIC-white-paper-20120501.pdf>.

³³⁶ Gregg, Nunn, and Lozar, “An Urgent Priority,” 1.

³³⁷ Gabriel R. Sanchez, Robert Maxim, and Raymond Foxworth, “The monthly jobs report ignores Native Americans. How are they faring economically?” *The Avenue*, Brookings, November 10, 2021, <https://www.brookings.edu/blog/the-avenue/2021/11/10/the-monthly-jobs-report-ignores-native-americans-how-are-they-faring-economically>.

³³⁸ Ibid.

³³⁹ Ibid.

³⁴⁰ Alicia Wallace, “The US will now break out jobs data for Native Americans,” *CNN Business*, March 5, 2022, <https://www.cnn.com/2022/03/05/economy/native-american-monthly-employment-data/index.html>.

³⁴¹ Akee, “Sovereignty and Improved Economic Outcomes.”

³⁴² Gregg, Nunn, and Lozar, “An Urgent Priority.”

reservation level, it may not be available at other vital levels, such as service areas, funding formula areas, or tribally established reservation districts.

The Census Bureau’s application of “differential privacy,”—the deliberate introduction of noise into a dataset to prevent users from identifying individual respondents—to its decennial census data set has created significant concern about the accuracy of that essential source of demographic data for Native communities, other racial groups, and other areas with smaller populations. Differential privacy methods are especially implemented in areas with lower population counts, “such as rural or remote areas where commercial data could more easily be used to identify individuals.”³⁴³ This could significantly change population counts in areas “where a disproportionate number of individuals from certain racial and ethnic groups reside, especially when they are in small numbers in that area or geographic region,” and for small populations such as the American Indian, Alaska Native, and Native Hawaiian populations.³⁴⁴ This practice has the potential to exacerbate the aforementioned issues with the availability and reliability of data on Native populations.

The Role of Data Sovereignty

Data sovereignty, a component of the overarching sovereignty possessed by Indian tribes and a critical manifestation of tribal self-determination, refers to the right of indigenous people and nations to govern the collection, ownership, and application of their own data.³⁴⁵ Historically, Native communities were essentially treated as laboratories by universities and research institutions, with resource-limited tribes unable to exercise substantial control over potentially harmful research activities within their lands.³⁴⁶

To prevent the exploitative and extractive practices of some researchers operating within reservations and Native communities, and to ensure that tribes and Native communities retain access to and ownership of information collected from their people as well as the authority to determine how that information can be used, many tribes have established Institutional Review Boards (IRBs).³⁴⁷

³⁴³ “Differential Privacy and the 2020 U.S. Decennial Census: Impact on American Indian and Alaska Native Data,” NCAI Policy Research Center, National Congress of American Indians September, 2019, https://www.ncai.org/prc/2020_Census_and_AIAN_data_FINAL_9_11_2019.pdf.

³⁴⁴ Ibid.

³⁴⁵ Alex Tammaro, “Native Data Sovereignty Can Address Data Gaps and Improve Equity,” *Urban Wire*, Urban Institute, June 13, 2022, <https://www.urban.org/urban-wire/native-data-sovereignty-can-address-data-gaps-and-improve-equity>.

³⁴⁶ Danielle Hiraldo, et al., “Native Nation Rebuilding for Tribal Research and Data Governance,” Tucson: Native Nations Institute, University of Arizona, January 1, 2020, <https://nnigovernance.arizona.edu/sites/nnigovernance.arizona.edu/files/resources/Policy%2520Brief-%2520Native%2520Nation%2520Rebuilding%2520for%2520Tribal%2520Research%2520and%2520Data%2520Governance.pdf>.

³⁴⁷ “Institutional Review Boards,” Indian Health Service, accessed April 28, 2023, <https://www.ihs.gov/dper/research/hsrp/instreviewboards>.

These boards are generally composed of experienced researchers from tribal colleges and nearby universities, local leaders, and community members who are tasked with reviewing the purpose, methodology, and efficacy of proposed research; evaluating potential or anticipated harms or negative impacts on community members who will be asked to participate in the research; and retaining the authority to approve or reject proposed uses or publication of the information gathered. In addition to protecting community members from harm or exploitation, IRBs often also seek to coordinate, and in some cases limit, externally developed research activities within reservations and Native communities, which are already frequently surveyed internally by tribes and tribal programs themselves to assess needs, refine programs and services, and plan for the future.³⁴⁸

As tribes continue to more fully express and implement data sovereignty, and other non-tribal entities embrace and incorporate the guiding principles of data sovereignty into their processes, tribes and Native communities are more actively participating in the design and monitoring stages of data collection projects within their lands. They are also developing strong partnerships with other tribal and non-tribal organizations at state, regional and national levels.³⁴⁹ By capitalizing on the resources and expertise of each of the partners, they can produce much-needed accurate tribal data sets, while retaining tribal ownership and control over the use of the data collected. For many tribes, the next step along the path toward true data sovereignty and self-determination is the development of the requisite data management infrastructure and human resources necessary to securely store, organize, analyze, and efficiently use and share the data that they possess.³⁵⁰

Impacts of Data Limitations for Native Communities

The lack of accurate, relevant, and precise subject-specific data undercuts the efforts of tribes and Native organizations to promote and sustain community economic development activities. This data is not only necessary for supporting internal community economic development planning efforts, but it is also essential for allowing lenders and investors to assess the opportunities and risks associated with bringing their capital to Native lands. The unique land ownership issues and stunted housing markets in many Native communities, for example, limits or prevents many mainstream data-related services, such as Zillow, from covering Native communities. Many appraisers located outside of Native lands may be discouraged from conducting land and structure valuation activities in these areas due to the lack of available databases of comparable property values.³⁵¹ As a result, land sales are hindered due to

³⁴⁸ Deana Around Him, et al., “Tribal IRBs: A Framework for Understanding Research Oversight in American Indian and Alaska Native Communities,” *American Indian and Alaska Native Mental Health Research* 2, no. 2 (2019): 71–95.

³⁴⁹ Heather Erb, “Tribal Data Sovereignty and the Critical Role of Data in Public Health Governance,” American Indian Health Commission for Washington State, accessed April 28, 2023, <https://bja.ojp.gov/doc/tribal-data-sovereignty-presentation.pdf>.

³⁵⁰ Hiraldo, et al., “Native Nation Rebuilding for Tribal Research and Data Governance.”

³⁵¹ Kevin Klingbeil and Harry Maher, “Appraisal Market Study,” South Dakota Native Homeownership Coalition, February 2, 2021, <https://www.sdnativehomeownershipcoalition.org/2019/wp-content/uploads/2019/10/SDNHC-Appraisal-Market-Study-Final-Report.pdf>.

uncertainty regarding property values for both the seller and the buyer. Many tribes have created their own realty and title offices to reduce the amount of time necessary to obtain title status reports to facilitate land and home sales and purchases, and to develop their own databases recording real property sales to support their land and housing markets.

Similarly, because many businesses operating on reservations are owned by the tribe and are not subject to federal taxation, critical business data, such as average return on investment, anticipated growth in terms of hiring and revenue, numbers and timing of new business or facility development, or telecommunications connectivity of households and local enterprises, which demonstrate the viability of economic development in Native lands, may not be disclosed.³⁵² In cases where it is disclosed, such as in the National Indian Gaming Commission (NIGC) annual reports on the Native gaming industry, it may only be available in the form of aggregated data sets or comprehensive tribal economic reports.³⁵³

The limited presence and scope of measurement and reporting of community economic development activities in tribal lands, via tribal planning departments, data/vital records centers, and chambers of commerce, also likely contributes to the challenge of attracting capital to Native lands. Without consistent and available measurement or reporting, potential investors and grantmaking entities have a more difficult time identifying the broader framework in which a project or investment will fit, and may not believe that the necessary infrastructure will be created or maintained to support their investment. There is no standardized system for measuring the contributions that some tribal governments provide to their regional and local economies. Recent tribal efforts to measure economic impacts include a 2014 summary of the economic impacts of the five tribes of Idaho on Idaho's economy, a 2019 study of economic impacts of Oklahoma tribes,³⁵⁴ a 2019 Michigan study of the benefits of non-gaming tribal enterprises, and a 2022 report on the impact of investments made by 29 Washington tribes to the state's quality of life.³⁵⁵

The absence of reliable demographic and community economic development data also has a direct impact on the levels of federal grant funding allocated to tribes and Native communities as well as their eligibility to participate in specific programs designed to target areas with demonstrated need.³⁵⁶ For example, the Indian Housing Block Grant (IHBG) formula allocates Native American Housing and Self-Determination Act (NAHASDA) funding based on the number of self-identified American Indian Alaska Native and Native Hawaiian (AIANNH) individuals and households in an area, since these services can only be provided to tribal

³⁵² "Indian Country's Once-in-a-Seven-Generation Opportunity," Wells Fargo, 2022, <https://www08.wellsfargomedia.com/assets/pdf/commercial/focus/2022-tribal-economic-resiliency-report-0929.pdf>.

³⁵³ "The Role of Data in Building Vibrant Tribal Economies."

³⁵⁴ "Oklahoma Native Impact," Oklahoma Native Impact Study, 2019, <https://www.oknativeimpact.com>.

³⁵⁵ Meister Economic Consulting, "The Economic Impact of Tribal Gaming: A State-by-State Analysis," American Gaming Association, November, 2018, <https://www.americangaming.org/wp-content/uploads/2018/11/Economic-Impact-of-Tribal-Gaming-Two-Pager-11.5.18.pdf>.

³⁵⁶ "Data and Funding Gaps in Tribal Early Care and Education," Bipartisan Policy Center, April, 2021, <https://bipartisanpolicy.org/explainer/gaps-in-tribal-care>.

members.³⁵⁷ Funding for the tribal transportation program is partially based on the AIANNH population data incorporated into the IHBG formula, so any inaccuracy within the data set used for IHBG funding is then magnified when used as the basis for another critical federal funding formula. Other tax incentive programs, such as the LIHTC and NMTC programs, require that projects be located in Qualified Census Tracts or areas designated as low-income communities, which are based on the income levels of households in the relevant area. But tract boundaries do not always correspond to the geography of Native lands, and many “landless” tribes have service areas rather than official reservation lands. Geographical mismatches between tribal lands or services areas and official Census boundaries can prevent tribes from qualifying for federal programs, especially if tribal lands fall into tracts that overlap with wealthier non-Native communities.

Recommendations for Future Data Collection

To improve and fill in the gaps in federal, tribal, and other data describing Native communities, a comprehensive evaluation of available data sources should be conducted. This evaluation would address the issues of data relevance, accuracy, and precision described above. One example of a similar but narrower exercise was an evaluation of an array of potential data sources for the IHBG formula, completed by the Data Study Group to support the Indian Housing Block Grant Formula Negotiated Rulemaking Committee. The Data Study Group highlighted the specific reasons why federal, tribal, and other data sources would or would not work for the specific purpose of supporting the IHBG formula and allocation of funds pursuant to NAHASDA. The researchers also recommended changes to certain surveys and data collection processes to better serve Native communities, such as oversampling in Native lands or revisiting the use of proxies (such as neighbors or knowledgeable non-members of the household) to collect information about large or multi-family households.³⁵⁸

Changing large scale data collection processes to better cover specific populations is not always feasible or practical without significant legislative advocacy. But efforts to further analyze or visualize existing data or analyze datasets in relation to one another can help increase their value in promoting community economic development in Native lands. The Center for Indian Country Development (CICD) launched an effort to expand the evaluation, analysis, and visualization of data regarding tribal and Native communities, which includes analysis of Current Population Survey (CPS) data to more appropriately capture the employment and labor force participation rates of individuals who self-identify as either AIAN alone or AIAN in combination with other races.³⁵⁹ CICD has also mapped financial resources in American Indian, Alaska Native and Native Hawaiian (AIANNH) areas and layered geospatial data to enable users to identify

³⁵⁷ “Data Use and Regulatory Status of the Indian Housing Block Grant Program,” U.S. Government Accountability Office, GAO-15-353R, Washington, DC: U.S., March 10, 2015, <https://www.gao.gov/products/gao-15-353r>.

³⁵⁸ “IHBG Negotiated Rulemaking Data Study Group Final Report,” Indian Housing Block Grant Formula Negotiated Rulemaking Committee, no. 1, July 31, 2015, https://ihbgrulemaking.org/images/Library/IHBG_Negotiated_Rulemaking_Data_Study_Group_Report_080315_Volume_I.pdf.

³⁵⁹ “Native American Labor Market Dashboard.”

economic development activities in AIANNH areas as well as areas eligible for Community Reinvestment Act activities.^{360,361}

Any evaluation of existing data sources must include an inventory of local and tribal data. Tribal governments gather a wide array of informative data through their own departments and chartered entities because of their ongoing relationships with local and state governments, utility providers, and other local, state, and national organizations. For example, application and certification processes enable programs to collect vital information about household incomes, telecommunications and utility costs, the condition of housing and community infrastructure, health and wellness, and employment status.

Many tribes and Native organizations have recognized that new data collection is necessary to ensure that Native communities are equipped with databases that are appropriate for their intended purposes and that accurately reflect the conditions, needs, and opportunities in their communities. The resulting surveys, market studies, and needs assessments enable tribes and Native communities to gather more accurate data regarding:

- Informal economies (including self-employment in the form of craft-making and fishing);
- Available skills sets and experience within their communities;
- Individual interest in new employment, small business development and further education;
- Community interest in specific new tribal enterprises and services; and
- The potential interest and availability of members living off-reservation to support new enterprises, tribal departments, and homeownership programs.

As tribes and Native communities become collectors and providers of new, more accurate local datasets, their ability to serve as partners in regional planning and economic development efforts will increase.

Critical requirements for tribal data collection include the internal tribal, organizational, or departmental capacity to complete data collection efforts with the statistical rigor required for the proposed data use. It might be necessary to locate new sources of funding to conduct data collection activities. Programs such as the HUD Section 4 Capacity Building program, implemented in Native communities by Enterprise Community Partners, provides funding specifically for tribes and community development organizations to build data collection capacity. Additionally, specific federal grant programs managed by Federal Emergency

³⁶⁰ Center for Indian Community Development, “Native American Funding and Finance Atlas,” Federal Reserve Bank of Minneapolis, accessed January 13, 2023, <https://www.minneapolisfed.org/indiancountry/resources/native-american-funding-and-finance-atlas>.

³⁶¹ “Mapping Native American Financial Institutions.”

Management Agency (FEMA),³⁶² the Substance Abuse and Mental Health Services Administration (SAMHSA),³⁶³ and EDA³⁶⁴ provide funding for needs assessment and planning activities, which includes a community-based data collection component. Tribal grants and planning departments, vital records offices, data and business resource centers, and other organizations engaged in using existing and newly collected data are vital for maximizing the utility and value of collected data and for highlighting areas for improvement for tribal, federal, and other surveys.

Cultural Values and Economic Development

While tribal governments work towards economic growth, they are also focused on preserving tribal culture, identity, sovereignty, population, and land, creating a unique balance of priorities that is distinct from other rural communities. All components of community economic development in Indian Country are also considered through a cultural lens by tribal actors, which can help explain some of the economic decisions made by tribal governments.

Tribal self-governance adds a layer of complexity to economic growth, which is distinct from the layers of governance non-tribal rural areas experience. For example, many tribes might make an active choice to avoid exploiting or developing their natural resources, such as minerals, water, or forests, for economic gain. While natural resources are a common economic resource for most rural areas, land itself, in its unspoiled state, often holds a significant historical, cultural, and spiritual meaning. Therefore, the appropriate choice for a tribe might be to preserve the land rather than develop resources for economic growth. Tribes might also decide to invest resources into acquiring more land, especially land of historic significance, rather than investing in other economic ventures. Tribal land ownership through the trust system is critical to maintaining tribal sovereignty and preserving the reservation land base. This system is unique to Indian Country and does not occur in other rural areas.

Tribes often weave their cultural values into their decisions for how to run their businesses. For example, many tribes have designated their casinos as alcohol-free, which is not a common choice among non-tribal casinos. Many tribal casinos offer day care centers on site for employees. Tribes may also incorporate their Native languages into their economic development strategies by adding them to road, interstate, town, and business signage.

Many tribes have strong community, family, and cultural ties that help communities stay together even if poverty rates are high, in an effort to protect cultural identity. This is different from many other rural areas, where large-scale migration is a common response to poverty. This

³⁶² “Hazard Mitigation Grant Program,” Federal Emergency Management Agency, accessed January 13, 2023, <https://www.fema.gov/grants/mitigation/hazard-mitigation>.

³⁶³ “Circles of Care,” Substance Abuse and Mental Health Services Administration, U.S. Department of Health & Human Services, accessed January 13, 2023, <https://www.samhsa.gov/tribal-ttac/circles-care>.

³⁶⁴ “Fiscal Year 2021-2023 EDA Planning and Local Technical Assistance Program,” U.S. Economic Development Administration, accessed January 13, 2023, <https://www.eda.gov/funding/funding-opportunities/fiscal-year-2021-2023-eda-planning-and-local-technical-assistance>.

community dynamic might inform tribal decisions to use general tribal funds and gaming or enterprise revenue to preserve and create affordable housing, when possible, to allow members to remain near their tribal lands and communities.

Those interested in partnering on projects in Indian Country can benefit from enhanced cultural understanding. When surveyed, Native American nonprofit leaders stressed the desire for funders and foundations to have already conducted background research before establishing relationships to cultivate connections based on deepened understanding of the specific community.³⁶⁵ Outreach to Native tribes needs to be consistent and thorough while acknowledging the wide perspectives and unique experiences and complexities of each tribe and community.

Conclusion

After emerging from several generations of near-complete federal (and, in some cases, state) government control of economic development within most Native lands and communities, tribes and Native communities have been steadily building their community economic development capacity and diversified their local economies since the onset of the self-determination era in the 1970s. This has resulted in an expansion of tribal enterprises and community economic development activities, including in the gaming, health care, clean energy, and environmental sectors.

Tribes and Native communities have successfully used federal programs, grants, and tax credit allocations, as well as land leasing authority granted under the HEARTH Act, to leverage investment in housing and develop mechanisms that support and promote expanded investment within trust lands. This review of community economic development in Indian Country describes the diverse range of approaches and successful efforts to funding and planning community economic development in Indian Country, as well as challenges still facing the space.

Many regional and national Native organizations argue that the issue of community economic development in Native lands is now less dependent on capacity-building than on adequate and equitable access to financing and capital. These organizations posit that the focus should be on developing grant and financing guidelines that more fairly incorporate the unique circumstances of Native communities into selection criteria, as well as the creation of a set of tribal and Native set-asides to ensure tribal participation in certain programs.³⁶⁶ Such set-asides would outweigh or defray the cost and uncertainty related to applying for competitive grants, tax credits, and other financing mechanisms.

Despite the progress that has been made, federal policymakers, funders, and private investors still often lack necessary understanding about the community economic development goals and

³⁶⁵ Buteau, Martin, and Malmgren, “Overlooked (Part Two).”

³⁶⁶ “Lawmakers Call for Expanded NMTC Access for Native Communities,” *Tax Notes*, September 28, 2020, <https://www.taxnotes.com/research/federal/legislative-documents/congressional-tax-correspondence/lawmakers-call-for-expanded-nmtc-access-for-native-communities/2d088>.

outlooks of Native American leaders, planners, and communities. Relationship-building and consultation should continue to ensure that all parties can participate in the array of opportunities that exist for investment and economic development in Native lands. Furthermore, there are structural factors in current federal and state programs and policies that limit the abilities of even well-intended programs to adequately support and encourage participation of Native communities and meet their needs in ways that are consistent with their cultural values. This Market Research Report is a first step towards bridging that divide.

Glossary

AIANNH: American Indian, Alaska Native, and Native Hawaiian. The Indian Housing Block Grant formula allocates NAHASDA funding based on the number of self-identified AIANNH individuals and households in an area.

ANCSA: Alaska Native Claims Settlement Act: Authorized Alaska Natives to 44 million acres of public land in Alaska and \$962.5 million in cash as settlement of their aboriginal claim to land in the state. It established Alaska Native villages and regional Alaska Native corporations to oversee the lands and payments, changing the land ownership model from one of shared co-ownership to one of corporate shareholding.

ANVSA: Alaskan Native Village Statistical Areas. Census-defined areas representing the permanent or seasonal residences for Alaska Natives who are members of, or receiving governmental services from, a defined Alaska Native village.

ATNI: Affiliated Tribes of Northwest Indians. Formed in 1953, today ATNI is a nonprofit organization representing 57 Northwest tribal governments from Oregon, Idaho, Washington, southeast Alaska, Northern California and Western Montana, dedicated to tribal sovereignty and self-determination.

CDC: Community Development Corporation. Community-centered nonprofit organizations whose primary purpose is to provide resources to and revitalize low-income, historically underserved areas that experience high levels of divestment.

CDFI Fund: Community Development Financial Institutions Fund. Created for the purpose of promoting economic revitalization and community development through investment in and assistance to community development financial institutions. The CDFI Fund was established by the Riegle Community Development and Regulatory Improvement Act

of 1994. Native American CDFIs and a special CDFI Native Initiative Fund stimulate and aid these CDFIs.

CDFI: Certified Community Development Financial Institution. Banks, credit unions, loan funds, microloan funds, or venture capital providers that provide access to financial products and services for residents and businesses in low-income communities.

CRA: Community Reinvestment Act. Enacted in 1977, the Community Reinvestment Act requires the Federal Reserve and other federal banking regulators to encourage financial institutions to help meet the credit needs of the communities in which they do business, including low- and moderate-income neighborhoods.

fractionated ownership: The term used to note ownership of a property in the name of more than one individual. It is typically used in conjunction with allotted or individual trust lands to describe situations in which, over time and through division of inheritance, multiple parties have claim to a single property.

Federal Indian Reservations: Land reserved for a tribe or tribes under treaty or other agreement with the United States, executive order, or federal statute or administrative action as permanent tribal homelands, and where the federal government holds title to the land in trust on behalf of the tribe.

GLITC: Great Lakes Inter-Tribal Council, Inc. is a consortium of federally recognized Indian tribes in Wisconsin and the Upper Peninsula of Michigan. The organization was chartered in 1965 as a nonprofit corporation. Today, GLITC is recognized as a tribal organization under the Indian Self-Determination and Education Act. Its mission has evolved to support member tribes in expanding self-determination efforts by providing services and assistance.

GSE: Government-sponsored entity. A government-sponsored entity, also known as a government-sponsored enterprise, is a quasi-governmental, privately held agency established by Congress to improve credit flow in some regions of the United States' economy. GSEs provide financial services to the public for various things, particularly mortgages, through capital market liquidity. GSEs help to facilitate borrowing for a variety of individuals, including students, farmers, and homeowners.

Hawaiian Home Land Trust: More than 200,000 acres set aside by Congress in 1921 via the Hawaiian Homes Commission Act (HHCA), managed today by the State of Hawaii Department of Hawaiian Home Lands (DHHL). Eligible Native Hawaiians—those who are 50% or more Native Hawaiian by blood quantum—can apply to live on designated trust land.

HEARTH Act: Helping Expedite and Advance Responsible Tribal Homeownership. The HEARTH Act of 2012 creates an alternative land leasing process. Tribes are authorized to execute agricultural and business leases of tribal trust lands for a primary term of 25 years and up to two renewal terms of 25 years each without approval by the Secretary of the U.S. Department of the Interior, provided governing tribal leasing regulations have already been submitted to the Secretary.

Homestead Associations: Comparable to tribes on the main continent, these are Native Hawaiian entities that are beneficiary-controlled and serve and represent the interests of a homestead community.

Indian Country: The definition of “Indian Country” has changed throughout history, but the term is used here in the common colloquial sense to mean tribal areas, including Alaska Native villages. The term “Indian Country” is not used as a legal term in this report.

ICDBG: Indian Community Development Block Grant. A grant program administered by HUD to promote community development in Native communities.

IHBG: Indian Housing Block Grant, a formula grant that allocates funding for a range of affordable housing activities on Indian reservations and Indian areas. The block grant approach to housing for Native Americans was enabled by the Native American Housing Assistance and Self Determination Act of 1996 (NAHASDA.)

IMDA: Indian Mineral Development Act of 1982. Allowed tribes to enter into agreements for the development of their mineral resources.

Indian Self-Determination and Education Assistance Act of 1975: This piece of legislation redistributed power from the federal government to tribes in education and program administration. Later amendments in the 1980s and 1990s established block grants from the Indian Health Service and Bureau of Indian Affairs to cover other programs.

LIHTC: Low-Income Housing Tax Credit. Created by the Tax Reform Act of 1986, the LIHTC program gives state and local LIHTC allocating agencies the equivalent of nearly \$8 billion in annual budget authority to issue tax credits for the acquisition, rehabilitation, or new construction of rental housing targeted to lower-income households.

Native American Credit Unions: A credit union is a financial cooperative, owned entirely by its members. Typically, more than half of a Native American credit union's current and eligible potential members and more than half of its current board of directors are Native American.

NAFOA: The Native American Finance Officers Association. Established in 1982 to

financially assist tribal economies and strengthen tribal finance.

NAHASDA: Native American Housing Assistance and Self Determination Act. Signed on October 26, 1996, NAHASDA replaced the myriad programs that had previously provided housing assistance to Native American tribes under the U.S. Housing Act of 1937 with a block grant that allowed tribes or their Tribally Designated Housing Entities (also called TDHEs) more flexibility to decide whom to serve, what services to offer, and how to deliver programs and services. As with the 1937 Act, under NAHASDA, tribes are still required to primarily serve low-income families.

NAIHC: The National American Indian Housing Council. Founded in 1974, NAIHC provides training and technical assistance to tribes and tribal housing entities to support the development of safe, affordable, and culturally appropriate housing for Native people and communities.

NCAI: The National Congress of American Indians. Founded in 1944, NCAI is the oldest, and largest American Indian and Alaska Native rights organization meant to represent Native tribes and advocate for tribal sovereignty.

NCAIED: The National Center for American Indian Enterprise Development. The largest Native-centered national business organization.

Native CDFI: Native Community Development Financial Institution. CDFIs that direct at least 50% of their activities to serve Native Americans, Alaska Natives, or Native Hawaiian communities.

New Markets Native Areas (NMTC Native Areas): Defined by the CDFI Fund as Federal Indian Reservations, Off-Reservation Trust Lands, Hawaiian Home Lands, and Alaskan Native Village Statistical Areas.

NMTC: New Markets Tax Credits. The New Markets Tax Credit Program, established in 2000, incentivizes community development and economic growth through the use of tax credits that attract private investment to distressed communities.

off-reservation trust lands: Areas off of reservations but for which the United States holds title in trust for the benefit of a tribe (tribal trust land) or for an individual American Indian (individual trust land). Census-recognized off-reservation trust lands are associated with a specific federally recognized reservation or tribal government, and American Indian tribes have primary governmental authority over these lands.

OTSA: Oklahoma Tribal Statistical Area. Census-designated areas representing former American Indian reservations that existed in Indian and Oklahoma territories prior to Oklahoma statehood.

Pueblo: Communities and homelands of the Pueblo peoples, mostly in the Southwestern United States.

State-recognized American Indian Reservations: Tribal lands that are recognized by a state but not necessarily recognized by the federal government.

SWF: Sovereign wealth fund. Also known as a social wealth fund or a sovereign investment fund, these are state-owned investments which generate wealth for the benefit of its citizens and economy.

TDHE: Tribally Designated Housing Entity. The entity designated by each tribe that is responsible for administering its housing assistance program that is funded by the federal government.

TERA: Tribal Energy Development and Self-Determination Act of 2005 allows tribes to gain approval from the Secretary of the Interior for a

Tribal Energy Resource Agreement, giving them blanket authority to manage mineral development on its lands, without separate approval of each venture.

USET: United South and Eastern Tribes, Inc., established in 1969, is a nonprofit, inter-tribal organization serving thirty-three (33) federally recognized tribal nations from the Northeastern

Woodlands to the Everglades and across the Gulf of Mexico. USET is dedicated to enhancing the development of tribal nations, improving the capabilities of tribal governments, and improving the quality of life for Indian people through a variety of technical and supportive programmatic services.

Appendix A: Special Circumstances Pertaining to Alaska Native Villages, Oklahoma Tribes, Pueblos, and Hawaiian Home Lands

While all economic development throughout Native communities is shaped by unique legal, historical, and cultural contexts, there are some important distinctions between Alaska Native villages and Alaska Native corporations, Oklahoma tribal lands, Pueblos and Spanish land grants, and Hawaiian Home Lands.

Alaska

Passage of the Alaska Native Claims Settlement Act (ANCSA) in 1971 radically changed the way the United States deals with Indian tribes and Native villages in Alaska and dramatically affected the path of economic development for Alaska Natives. What is now Alaska is the aboriginal home of several Indian tribes and many Alaska Native groups, including Athabascan Indians, Aleuts, and Inuit (the Inuit include the Inupiat and Yupik peoples). Before 1971, the United States dealt with Indians and Native groups in Alaska in a fashion similar to that used with Indian tribes in the lower 48 states: through treaties, legislation, and executive orders.

ANCSA extinguished Native land claims to almost all of Alaska in exchange for about one-ninth of the state's land plus \$962.5 million in compensation. By conveying Native land title to 12 regional and 200 local Village Corporations chartered under Alaska state law, ANCSA changed the relationship between Natives and the land from one of co-ownership of shared lands to one of corporate shareholding (that is, land ownership was based on a corporate model). After ANCSA, Native villages served members and Native village corporations, and Native regional corporations served shareholders. A thirteenth regional Native corporation was created for Alaska Natives who had left the state and were not shareholders in one of the 12 regional corporations.

The Native regional corporations and Native village corporations operate very differently from most Native villages and Indian tribes. They have stockholders, substantial liquid assets, and are governed by a board of directors. Through a combination of corporate structure where individual members of tribes or Native villages own shares in the corporation, the relatively large amount of liquid assets they received when they were created (pursuant to the enactment of ANCSA), and their mission of protecting and expanding their assets, Alaska Native corporations are generally more open to investment outside their Native communities and have invested broadly in the economy of the United States.³⁶⁷

Oklahoma

The history of Oklahoma Indians is unlike that of any other state, and differences remain in land ownership and legal jurisdiction that continue to affect the economic development activities of Oklahoma tribes. Most of the tribes in Oklahoma are there as a result of relocation policies,

³⁶⁷ Walter Hillbrant, Judy Earp, Mack Rhoades, and Nancy Pindus, "Overcoming Challenges to Business and Economic Development in Indian Country," Princeton, NJ: Mathematica Policy Research, Inc. 2004.

which forced the movement of some tribes to the state from as far away as New England and the Pacific Northwest. The Five Civilized Tribes of the Southeast United States (Seminole, Choctaw, Chickasaw, Cherokee, and Creek) were among those forcibly removed to lands in Oklahoma in exchange for their homelands in the east.³⁶⁸

By 1837, all of Oklahoma's Indian Territory had been assigned to the Five Civilized Tribes, although some plains tribes such as the Kiowa, Comanche, Wichita, and Apache were granted hunting rights in the area. Between 1837 and the outbreak of the Civil War, the tribes largely functioned with limited interference from the U.S. government. The Civil War, however, had a devastating effect on the tribes. Some Indians remained loyal to the Union; others joined the Confederacy. The United States used the latter to abrogate all treaties made with the Five Civilized Tribes. Over the next few years, a new series of treaties resulted in extensive land cessions.³⁶⁹

Shortly after the Civil War, hostilities with the Southern Plains tribes led to the segregation of the Native population into Indian Territory. Many tribes were moved into the lands ceded by the Five Civilized Tribes. This move accounts for the current day boundaries of the reservations in Western Oklahoma. Life in Indian Territory again went through a period of relative calm, until the enactment of the Dawes Act, also known as the General Allotment Act, in 1887, which finally destroyed the notion of Indian Territory. The law authorized the President to break up reservation land, which was held in common by the members of a tribe, into small allotments to be parceled out to individuals. This, in effect, terminated the centralized reservations of the Five Civilized Tribes. The tribes of the western side of Oklahoma, such as the Comanche, the Kiowa, the Apache, the Tonkawa, and the Shawnee, remained largely independent of the white way of life; they maintained their nomadic hunting way of life.³⁷⁰

This complicated history has led to variation in state policies affecting Oklahoma Native populations, and ongoing legal disputes regarding land and mineral rights, court jurisdiction, taxation, and tribal sovereignty. While the situation has improved since 1976, legal issues continue. Oklahoma Tribal Statistical Areas (OTSAs) used by the Census denote areas that were formerly reservations, and still contain significant Native populations. The Census also recognizes OTSA joint-use areas, which are OTSAs that are administered jointly or claimed by two or more American Indian tribes that have a delineated OTSA.³⁷¹ Despite these Census-recognized areas, Oklahoma tribes have a limited amount of reservation land held in trust by the

³⁶⁸Hank Adams, John Echohawk, Dough Nash, Kevin Gover, and Roman Bitsuie, "Report on Trust Responsibilities and the Federal-Indian Relationship; Including Treaty Review. Final Report to the American Indian Policy Review Commission., Section VI Oklahoma," HathiTrust, American Indian Policy Review Commission, 1976, <https://babel.hathitrust.org/cgi/pt?id=uc1.31210015689068&view=1up&seq=1&skin=2o21>.

³⁶⁹ Adams, et al., "Report on Trust Responsibilities."

³⁷⁰ Ibid.

³⁷¹ Nancy Pindus, et al., "Technical Appendixes: Housing Needs of American Indians and Alaska Natives in Tribal Areas: A Report From the Assessment of American Indian, Alaska Native, and Native Hawaiian Housing Needs," U.S. Department of Housing and Urban Development, January, 2017.

federal government. Unlike many tribal communities in the lower 48, most land ownership in Oklahoma tribal areas is in fee-simple ownership which can be readily mortgaged.

Pueblos and Spanish Land Grants

From the end of the seventeenth century to the mid-nineteenth century, Spain (and later Mexico) made land grants to individuals, towns, and groups to promote development in the frontier lands that now constitute the American Southwest. There were two kinds of grants—private grants given to individuals, and community grants to settlers for new towns.³⁷²

Spain also issued land grants to several indigenous pueblo communities, which had occupied the areas granted long before Spanish settlers arrived in the Southwest. For example, in the Albuquerque area the Spanish governor awarded grants to the Pueblo de Sandia and the Pueblo de Isleta peoples. Under Spanish and Mexican law, common land was set aside as part of the original grant for the use of the entire community. The Spanish system required that the land surrounding an Indian pueblo be allotted to that pueblo for one league in each direction from the pueblo. This set up political and cultural boundaries for the Pueblo Indians and helped sustain Pueblo cultures.³⁷³

In 1848, the Treaty of Guadalupe Hidalgo formally ended the Mexican-American War, and the United States assumed control over vast new territories, including much of what is now the state of New Mexico. Under the treaty, the United States agreed to recognize all types of property ownership within the ceded areas. Over the next half century, the United States developed procedures to validate land grants in the territory of New Mexico to implement the treaty provisions.

But land tenure and ownership patterns were very different in Mexico and the United States. The Mexican and Spanish systems were based on a rural, community-based system of land holding prevalent in medieval Europe, and not on fee-simple ownership. Land was viewed more in its relationship to the community and was used primarily to provide sustenance to the local population, rather than as a commodity that could be exchanged or sold in a competitive market. The Surveyor General at the time found that many boundaries could no longer be found. Some grants overlapped. Owners had lost their original papers.³⁷⁴ Whether the United States accurately carried out the provisions of the treaty, especially regarding community land grants, has been a controversial issue for generations. Many persons, including grantee heirs, scholars, and legal experts, still claim that the United States did not protect the property of Mexican-Americans and their descendants, particularly the common lands of community land grants.³⁷⁵ They remain

³⁷² “Treaty of Guadalupe Hidalgo: Definition and List of Community Land Grants in New Mexico,” U.S. Government Accountability Office (GAO), GAO-01-951, September 2001, <https://www.gao.gov/assets/gao-01-330.pdf>.

³⁷³ “History: Land Grants,” Albuquerque Historical Society Tricentennial, accessed September 6, 2022, <https://albuqhistosoc.org/SecondSite/pkfiles/pk208landgrants.htm>.

³⁷⁴ Ibid.

³⁷⁵ “Treaty of Guadalupe Hidalgo.”

critical of the federal courts' treatment of the common lands and the failure to approve more of the acreage claimed. These disputes still arise and can delay or prevent economic development.

Hawaii

Although Congress has repeatedly acknowledged its special political and trust relationship with the Native Hawaiian community since the overthrow of the Kingdom of Hawaii more than a century ago, the federal government does not maintain a formal government-to-government relationship with the Native Hawaiian community as an organized, sovereign entity.

As part of this relationship and to support the self-sufficiency and well-being of the Native Hawaiian people, Congress established the Hawaiian Home Land Trust in 1921, a set-aside of more than 200,000 acres of land via the Hawaiian Homes Commission Act (HHCA). The State of Hawaii Department of Hawaiian Home Lands (DHHL), a state agency, manages the Hawaiian Home Land Trust, with oversight provided by the U.S. Department of the Interior (DOI). HHCA provides eligible Native Hawaiians—those who are 50% or more Native Hawaiian by blood quantum—with the ability to live on designated trust land. These trust lands are leased to HHCA trust beneficiaries for residential, agricultural, and pastoral purposes in homestead communities. From a legal perspective, the Hawaiian Home Lands are public lands held in trust by the State of Hawaii for the benefit of Native Hawaiians, as defined in HHCA. Thus, HHCA beneficiaries who become residents on one of the Hawaiian Home Lands are not landowners, but rather “lessees.”

The Native Hawaiian population receives federal housing funds through the Native Hawaiian Housing Block Grant (NHHBG), which is authorized by an amendment to the Native American Housing Assistance and Self-Determination Act (NAHASDA). DHHL manages NHHBG funds in addition to their day-to-day management of the Hawaiian Home Lands program. In 2014, Hawaii had 56 occupied homestead communities with 9,838 leases and, in 2010, according to the 2010 Census, there were 30,858 residents on the Home Lands.³⁷⁶ Apart from the Home Lands, Native Hawaiians are not eligible for any other federal set-asides available to recognized tribal or Native entities. Demand for homestead leases has consistently outstripped supply.³⁷⁷

Economic development within Hawaiian Home Lands is both supported and complicated by the fact that the DHHL manages the land held in trust for Hawaiian Home Lands trust beneficiaries. Most of the housing, infrastructure and economic development activities within these lands is conducted or coordinated by DHHL and are subject to applicable legal, regulatory, staffing, and

³⁷⁶ Kristen Corey, Jennifer Biess, Nancy Pindus, Doray Sitko, “Housing Needs of Native Hawaiians: A Report From the Assessment of American Indian, Alaska Native, and Native Hawaiian Housing Needs,” U.S. Department of Housing and Urban Development, 2017.

³⁷⁷ Nancy Pindus, et al., “Housing Needs of American Indians and Alaska Natives in Tribal Areas: A Report From the Assessment of American Indian, Alaska Native, and Native Hawaiian Housing Needs,” U.S. Department of Housing and Urban Development, January, 2017.

financial constraints.³⁷⁸ But homestead associations and organizations such as the Hawaiian Community Development Corporation allow Native Hawaiians to engage in economic development and engage in programs such as the Native CDFI program. Homestead associations are beneficiary-controlled organizations that serve and represent the interests of their homestead communities. They assist the DOI to communicate and work with Homestead and Beneficiary Associations (HBA) to administer federal laws that apply to Trust Lands and Trust Funds.³⁷⁹ Nonprofit organizations and homestead associations representing Native Hawaiian beneficiaries throughout the islands are developing greater capacity, expanding critical partnerships and program eligibility, and attracting greater and more diverse sources of funding and capital to serve Native Hawaiians and carry out community economic development activities within Hawaiian Home Lands and in communities throughout the Hawaiian Islands.³⁸⁰

³⁷⁸ “Maui Beneficiary Ho’ohui Project,” Big Water Consulting, October 12, 2021, <https://static1.squarespace.com/static/5be730232487fdec648106ac/t/622250eba04b4565ed2e8982/1646416112418/Maui+Beneficiary+Ho%27ohui+Project+Final+Report.pdf>.

³⁷⁹ “Homestead & Beneficiary Associations: Frequently Asked Questions.”

³⁸⁰ “Maui Beneficiary Ho’ohui Project.”

Appendix B: Organizations Participating in Information Gathering Discussions

Many initiatives unfolding within Native lands are not summarized in traditional academic journals or newspapers. To provide a more complete view of current models, challenges and opportunities for community economic development in Native lands and identify additional sources of information describing them, the research team conducted conversations with knowledgeable individuals from the organizations listed below.

Organizations Participating in Discussions with Big Water Consulting

Citizen Potawatomi Community Development Corporation, 13 July 2022. <https://cpcdc.org>.

Cook Inlet Housing Authority, 12 July 2022. <https://www.cookinlethousing.org>.

MoFI, 27 July 2022. <https://www.mofi.org>.

Small Business Administration (SBA), 5 August 2022. <https://www.sba.gov/about-sba/sba-locations/headquarters-offices/office-native-american-affairs>.

Clearinghouse CDFI, 27 July 2022. <https://www.clearinghousecdfi.com>.

Native American Bank, 19 July 2022. <https://nativeamericanbank.com>.

Four Bands Community Fund, 14 July 2022. <https://fourbands.org>.

Alaska Growth Capital BIDCO, Inc., 27 July 2022. <https://www.alaskagrowth.com>.

Craft3, 14 July 2022. <https://www.craft3.org>.

Federal Reserve Bank of Minneapolis' Center for Indian Country Development, CICD), 20 July 2022. <https://www.minneapolisfed.org/indiancountry>.

Native Nations Institute, University of Arizona, 3 August 2022. <https://nni.arizona.edu>.

Native CDFI Network, 18 July 2022. <https://nativecdfi.net>.

Travois. 13 July 2022. <https://travois.com>.

Native American Finance Officers Association (NAFOA), 18 July 2022. <https://nafoa.org>.

Sovereign Council of Hawaiian Homestead Associations (SCHHA) and Native CDFI Network,
27 July 2022. <https://hawaiianhomesteads.org/schha>

Northwest Native Development Fund, 14 July 2022. <https://thenndf.org>.

Native Community Capital, 29 July 2022. <https://nativecap.org>.

Chickasaw Nation Community Development Endeavor, LLC, 19 August 2022. <http://cncde.net>.

Bibliography

- Abalo, Trish, Adam Engwis, and Tory Martin. "Philanthropy is Entering a New Era of Engagement with Native Communities," Dorothy A. Johnson Center for Philanthropy. January 18, 2022. <https://johnsoncenter.org/blog/philanthropy-is-entering-a-new-era-of-engagement-with-native-communities/>.
- Adams, Hank, John Echohawk, Dough Nash, Kevin Gover, and Roman Bitsuie. "Report on Trust Responsibilities and the Federal-Indian Relationship; Including Treaty Review. Final Report to the American Indian Policy Review Commission., Section VI Oklahoma" HathiTrust. American Indian Policy Review Commission, 1976. <https://babel.hathitrust.org/cgi/pt?id=uc1.31210015689068&view=1up&seq=1&skin=2o21>.
- Affiliated Tribes of Northwest Indians Economic Development Corporation. "Affiliated Tribes of Northwest Indians Economic Development Corporation." Accessed September 15, 2022. <https://atniedc.com>.
- Akee, Randall. "Sovereignty and Improved Economic Outcomes for American Indians: Building on the Gains Made Since 1990." *Washington Center for Equitable Growth*, 2021. <https://equitablegrowth.org/sovereignty-and-improved-economic-outcomes-for-american-indians-building-on-the-gains-made-since-1990>.
- Albuquerque Historical Society Tricentennial. "History: Land Grants." 2008. Accessed September 2, 2022. <https://albuqhistsoc.org/SecondSite/pkfiles/pk208landgrants.htm>.
- AMERIND. "Tribal Government & Business." Accessed September 6, 2022. <https://amerind.com/services/tribal-government-business>.
- Anderson, John E., and Robert W. Wassmer. *Bidding for Business: The Efficacy of Local Economic Development Incentives in a Metropolitan Area*. Kalamazoo, MI: W.E. Upjohn Institute for Employment Research, 2000. <https://doi.org/10.17848/9780585313610>.
- Around Him, Deana, Temana Andalcio Aguilar, Anita Frederick, Heather Larsen, Michaela Seiber, and Jyoti Angal. "Tribal IRBs: A Framework for Understanding Research Oversight in American Indian and Alaska Native Communities." *American Indian and Alaska Native Mental Health Research* 2, no. 2 (2019): 71–95.
- Bank of Cherokee County. "Our Story." Accessed September 6, 2022. <https://www.bankofcherokeecounty.net/about/our-story>.
- Baer Gee, Shalom. "Pine Ridge, Rosebud Reservations Receive \$70M Broadband Grant." *Rapid City Journal*, August 23, 2022. Accessed September 6, 2022.

https://rapidcityjournal.com/news/pine-ridge-rosebud-reservations-receive-70m-broadband-grant/article_04f7788c-ef2e-5115-9e7f-a7731c22aeca.amp.html.

Bay Bank. “About Us.” Accessed September 6, 2022. <https://www.baybankgb.com/About-Us>.

Biess, Jennifer. “Homelessness in Indian Country Is a Hidden, but Critical, Problem.” *Urban Wire*, Urban Institute, April 11, 2017. <https://www.urban.org/urban-wire/homelessness-indian-country-hidden-critical-problem>.

Big Island Video News. “West Hawaii Community Health Center Opens.” *Big Island Video News*, July 15, 2015. Accessed September 7, 2022. <https://www.bigislandvideonews.com/2015/07/15/west-hawaii-community-health-center-opens>.

Big Water Consulting. “Maui Beneficiary Ho’ohui Project.” October 12, 2021. <https://static1.squarespace.com/static/5be730232487fdec648106ac/t/622250eba04b4565ed2e8982/1646416112418/Maui+Beneficiary+Ho%27ohui+Project+Final+Report.pdf>.

Bipartisan Policy Center. “Data and Funding Gaps in Tribal Early Care and Education.” April 2021. <https://bipartisanpolicy.org/explainer/gaps-in-tribal-care>.

Board of Governors of the Federal Reserve System. “Community Reinvestment Act (CRA).” Accessed January 11, 2023. https://www.federalreserve.gov/consumerscommunities/cra_about.htm.

Board of Governors of the Federal Reserve System. “Growing Economies in Indian Country: Taking Stock of Progress and Partnerships.” April 2012. <https://www.federalreserve.gov/newsevents/conferences/GEIC-white-paper-20120501.pdf>.

Board of Governors of the Federal Reserve System. “Community Reinvestment Act Proposed Rulemaking.” August 24, 2022. <https://www.federalreserve.gov/consumerscommunities/community-reinvestment-act-proposed-rulemaking.htm>.

Bombardieri, Marcella. “At Navajo Technical University, a World-Class Laboratory Is Building Native American Manufacturing Capacity.” Center for American Progress. January 24, 2023. <https://www.americanprogress.org/article/at-navajo-technical-university-a-world-class-laboratory-is-building-native-american-manufacturing-capacity>.

Bond, Avi, Sarina Dayal, Mantin Diomande, Anna Koob, Supriya Kumar, Yumei Lin, Larry McGill, Betty Saronson, Grace Sato, Vanessa Suarez. “Investing in Native Communities: Philanthropic Funding for Native American Communities and Causes.” Candid, 2019. <https://www.issuelab.org/resources/35493/35493.pdf>.

- Bowman, Michelle. W. "Engagement, Research and Policy: Integrating Indigenous Voices into Economic Inclusion at the Federal Reserve." Federal Reserve Board, November 29, 2021. <https://www.federalreserve.gov/newsevents/speech/bowman20211129a.htm>.
- Boyer, Paul. "Ready for Work." *Native Science Report*, February 2022. <https://nativesciencereport.org/2020/02/ready-for-work>.
- Bureau of Indian Affairs. "Approved Hearth Act Regulations." Accessed September 2, 2022. <https://www.bia.gov/service/HEARTH-Act/approved-regulations>.
- Bureau of Indian Affairs. "Business Leasing on Indian Lands Handbook." September 30, 2021. https://www.bia.gov/sites/default/files/dup/assets/public/raca/handbook/pdf/52%20IAM%2014-H_Business%20Leasing%20Handbook_FINAL_signed_w.footer_508.pdf.
- Bureau of Indian Affairs. "EDA ARPA Plan Programs: Indigenous Communities." Accessed September 9, 2022. <https://www.bia.gov/service/whcnaa/eda-arpa-indigenous-communities>.
- Bureau of Indian Affairs. "Federal Resources for Tribal Economic Development." July 12, 2022. https://www.bia.gov/sites/default/files/dup/inline-files/oied_shared_ed_resource_directory_v1_7.12.22.pdf.
- Bureau of Indian Affairs. "Indian Affairs approves three Tribal Nations' HEARTH Act regs." U.S. Department of the Interior. February 25, 2022. <https://www.bia.gov/news/indian-affairs-approves-three-tribal-nations-hearth-act-regs>.
- Bureau of Indian Affairs. "Indian Business Incubators Program." Accessed September 6, 2022. <https://www.bia.gov/service/grants/ibip>.
- Bureau of Indian Affairs. "Indian Loan Guarantee and Insurance Program (ILGP)." U.S. Department of the Interior, accessed September 13, 2022. <https://www.bia.gov/service/loans/ilgp>.
- Bureau of Indian Affairs. "National Tribal Broadband Grant (NTBG)." Accessed August 24, 2022. <https://www.bia.gov/service/grants/ntbg>.
- Bureau of Indian Affairs. "Past Funded LLGP Grant Projects." Accessed August 24, 2022. <https://www.bia.gov/service/grants/llgp/past-funded-llgp-grant-projects>.
- Bureau of Indian Affairs. "Past Funded NABDI Grant Projects." Accessed September 6, 2022. <https://www.bia.gov/service/grants/nabdi/past-funded-nabdi-grant-projects>.

- Bureau of Indian Affairs. "Past Funded NTBG Grant Projects." Accessed August 24, 2022. <https://www.bia.gov/service/grants/ntbg/past-funded-ntbg-grant-projects>.
- Bureau of Justice Statistics. "Tribal Law Enforcement." Accessed September 6, 2022. <https://bjs.ojp.gov/topics/tribal-crime-and-justice/tribal-law-enforcement>.
- Buteau, Ellie, Hannah Martin, and Katarina Malmgren. "Overlooked (Part Two): Foundation Support for Native American Leaders and Communities." Center for Effective Philanthropy, 2021. http://cep.org/wp-content/uploads/2021/07/CEP_Overlooked_Native_American.pdf.
- Center for Indian Community Development. "Mapping Native American Financial Institutions." Federal Reserve Bank of Minneapolis. Accessed August 25, 2022. <https://www.minneapolisfed.org/indiancountry/resources/mapping-native-banks>.
- Center for Indian Community Development. "Native American Funding and Finance Atlas." Federal Reserve Bank of Minneapolis. Accessed January 13, 2023. <https://www.minneapolisfed.org/indiancountry/resources/native-american-funding-and-finance-atlas>.
- Center for Indian Community Development. "Native American Labor Market Dashboard." Federal Reserve Bank of Minneapolis. Accessed December 11, 2022. <https://www.minneapolisfed.org/indiancountry/resources/native-american-labor-market-dashboard>.
- CDFI Fund. "Agency Financial Report Fiscal Year 2022." U.S. Department of the Treasury. Accessed April 12, 2023. https://www.cdfifund.gov/sites/cdfi/files/2023-01/CDFI_Fund_FY22_AFR_FINAL508.pdf.
- CDFI Fund. "CDFI Certification." U.S. Department of the Treasury. Accessed April 24, 2023. <https://www.cdfifund.gov/programs-training/certification/cdfi>.
- CDFI Fund. "Fact Sheet: CDFI Bond Guarantee Program." U.S. Department of the Treasury, 2020. [https://www.cdfifund.gov/sites/cdfi/files/documents/cdfi-bond-guarantee-program-fact-sheet-\(english\)-12march2020.pdf](https://www.cdfifund.gov/sites/cdfi/files/documents/cdfi-bond-guarantee-program-fact-sheet-(english)-12march2020.pdf).
- CDFI Fund. *FY 2022 NMTC Public Data Release: 2003-2020 Data File*. October 6, 2022. Distributed by CDFI Fund. <https://www.cdfifund.gov/documents/data-releases>.
- CDFI Fund. "NACA Program Award Book." U.S. Department of the Treasury. 2022. https://www.cdfifund.gov/sites/cdfi/files/2023-02/2022_NACA_Award_Book.pdf.

- CDFI Fund. "Native Initiatives." U.S. Department of the Treasury, accessed September 6, 2022. <https://www.cdfifund.gov/programs-training/programs/native-initiatives>.
- CDFI Fund. "New Markets Tax Credit." U.S. Department of the Treasury. Accessed December 28, 2022. <https://www.cdfifund.gov/programs-training/programs/new-markets-tax-credit>.
- CDFI Fund. "New Markets Tax Credit: Frequently Asked Questions." U.S. Department of the Treasury. September 2020. <https://www.cdfifund.gov/sites/cdfi/files/documents/nmtc-compliance-monitoring-faq-16sept2020-final.pdf>.
- CDFI Fund. "New Markets Tax Credit Program Fact Sheet." U.S. Department of the Treasury. Accessed December 12, 2022. <https://www.cdfifund.gov/sites/cdfi/files/documents/nmtc-fact-sheet-english-16sept2020-final.pdf>.
- Celovsky, Anne, Amber Hunter, Katelin Jones, Kevin Klingbeil, Mary Lindeblad-Fry, Nancy Pindus. "Cheyenne River Housing Authority Housing Needs Study Report." South Dakota Native Homeownership Coalition. Accessed September 6, 2022. <https://static1.squarespace.com/static/5be730232487fdec648106ac/t/5c7078a1e4966b8d06adb454/1550874816156/Final+CRHA+Housing+Study+HQ+PDF+-+no+Bleed.pdf>.
- Chicago Metropolitan Agency for Planning. "Economic Development Incentives." June 2009. Accessed September 8, 2022. https://www.cmap.illinois.gov/documents/10180/50455/Economic+Development+Incentives+Strategy_June.pdf/0722371d-51d3-4f3e-aa15-171347ad7455.
- Colombe, James Robert, Rory Taylor. "Tribal Enterprises Drive Economic Activity in Indian Country and Beyond." Federal Reserve Bank of Minneapolis. July 6, 2021. <https://www.minneapolisfed.org/article/2021/tribal-enterprises-drive-economic-activity-in-indian-country-and-beyond>.
- Community-Wealth.Org. "Community Development Corporations (CDCs)." February 18, 2014. <https://community-wealth.org/strategies/panel/cdcs/index.html>.
- Congressional Native American Caucus. Letter to The Honorable Janet Yellon. March 29, 2022.
- Corey, Kristen, Jennifer Biess, Nancy Pindus, and Doray Sitko. "Housing Needs of Native Hawaiians: A Report from the Assessment of American Indian, Alaska Native, and Native Hawaiian Housing Needs." U.S. Department of Housing and Urban Development, 2017. <https://www.huduser.gov/portal/publications/housing-needs-native-hawaiians.html>.
- Cornell, Stephen. "What Makes First Nations Enterprises Successful? Lessons from the Harvard Project." *Joint Occasional Papers on Native Affairs*, no. 2006-01 (2006).

https://nnigovernance.arizona.edu/sites/nnigovernance.arizona.edu/files/2022-09/2006_CORNELL_JOPNA_whatmakesfirstnations.pdf.

Cornell, Stephen, and Joseph P. Kalt. "American Indian Self-Determination: The Political Economy of a Policy that Works." *HKS Faculty Research Working Paper Series*, RWP10-043 (2010). https://dash.harvard.edu/bitstream/handle/1/4553307/RWP10-043_Cornell_Kalt.pdf.

Cornell, Stephen and Joseph P. Kalt. "Two Approaches to Economic Development on American Indian Reservations: One Works, the Other Doesn't." *Joint Occasional Papers on Native Affairs*, (2006). https://www.honigman.com/media/site_files/111_imgimgjopna_2005-02_Approaches.pdf

Cunningham, Alisa, F. "Tribal College Contributions to Local Economic Development." Institute for Higher Education Policy, Washington, DC.; American Indian Higher Education Consortium, Alexandria, CA, 2000. http://www.aihec.org/our-stories/docs/reports/TC_contributionsLocalEconDevmt.pdf.

Dahl, Robert. "AMERIND Empowers Tribes to Take Control of Their Insurance Programs." *Tribal Business News*, July 25, 2022. Accessed September 6, 2022. <https://tribalbusinessnews.com/sponsored-content-category/13976-amerind-empowers-tribes-to-take-control-of-their-insurance-programs>.

Department of Hawaiian Home Lands. "About The Department of Hawaiian Home Lands." Accessed September 6, 2022. <https://dhhl.hawaii.gov/dhhl>.

Department of Hawaiian Home Lands. "La'i 'Ōpua Breaks Ground on Community Center." March 15, 2017. Accessed September 7, 2022. <https://dhhl.hawaii.gov/2017/03/15/la%ca%bbi-%ca%bbopua-breaks-ground-on-community-center>.

Department of Hawaiian Home Lands. "La'i 'Ōpua Celebrates New Health Center." December 13, 2013. Accessed September 7, 2022. <https://dhhl.hawaii.gov/2013/12/12/la%ca%bbi-%ca%bbopua-celebrates-new-health-center>.

Dimitrova-Grajzl, Valentina, Peter Grajzl, A. Joseph Guse. "Jurisdiction, Crime, and Development: The Impact of Public Law 280 in Indian Country." *Law & Society Review* 49, no. 1 (2014).

Dominguez, Carina, "Indigenous Women Say 'No' to Extraction for Sustainable Future." *Indian Country Today*, April 29, 2022. Accessed September 6, 2022. <https://indiancountrytoday.com/news/indigenous-women-say-no-to-extraction-for-sustainable-future>.

- Erb, Heather. "Tribal Data Sovereignty and the Critical Role of Data in Public Health Governance." American Indian Health Commission for Washington State. Accessed April 28, 2023. <https://bj.a.ojp.gov/doc/tribal-data-sovereignty-presentation.pdf>.
- Federal Communications Commission. "Chairwoman Rosenworcel Proposes to Increase Minimum Broadband Speeds and Set Gigabit Future Goal." July 15, 2022. <https://www.fcc.gov/document/chairwoman-rosenworcel-proposes-increase-minimum-broadband-speeds>.
- Federal Deposit Insurance Corporation. "Minority Depository Institutions List." November 30, 2022, <https://www.fdic.gov/regulations/resources/minority/mdi.html>.
- Federal Emergency Management Agency. "Hazard Mitigation Grant Program." Accessed January 13, 2023. <https://www.fema.gov/grants/mitigation/hazard-mitigation>.
- FDL Resource Management. "Strategic Energy Plan." 2022. Accessed September 7, 2022. <https://www.fdlrez.com/RM/energyplan.htm>.
- Financial Security Program. "The Role of Data in Building Vibrant Tribal Economies." *The Aspen Institute*. November 30, 2022. <https://www.aspeninstitute.org/blog-posts/the-role-of-data-in-building-vibrant-tribal-economies>.
- First Peoples Fund. "Establishing a Creative Economy." July 2013. <https://static1.squarespace.com/static/57be24e9d1758e95b6146331/t/57c9d010c534a5aa98846fce/1472843798529/document-market-study.pdf>.
- Fredericks, Carla F. and Kate R. Finn. "Harnessing Private Equity for Indigenous Peoples." Boulder, CO: First Peoples Worldwide University of Colorado, Boulder, 2020. https://www.colorado.edu/program/fpw/sites/default/files/attached-files/harnessing_private_equity_for_indigenous_peoples_-_final.pdf.
- Friedman, Misha. "For Native Americans, Health Care Is a Long, Hard Road Away." *NPR*. April 13, 2016. <https://www.npr.org/sections/health-shots/2016/04/13/473848341/health-care-s-hard-realities-on-the-reservation-a-photo-essay>.
- Ford Foundation. "Governments and Private Funders Announce Historic US\$1.7 Billion Pledge at COP26 in Support of Indigenous Peoples and Local Communities." November 1, 2021. <https://www.fordfoundation.org/news-and-stories/news-and-press/news/governments-and-private-funders-announce-historic-us-17-billion-pledge-at-cop26-in-support-of-indigenous-peoples-and-local-communities>.

- GCI Newsroom. “GCI, Wells Fargo Partner to Make AU-Aleutians Fiber Project a Reality.” *GCI Newsroom*, April 27, 2021. Accessed September 6, 2022. <https://news.gci.com/news-releases/new-market-tax-credits>.
- Gregg, Matthew and Elijah Moreno. “Examining tribal enterprises to understand Native economic development.” Federal Reserve Bank of Minneapolis, July 14, 2021. <https://www.minneapolisfed.org/article/2021/examining-tribal-enterprises-to-understand-native-economic-development>.
- Gregg, Matthew, Michou Kokodoko, & Elijah Moreno. “Take-up of New Markets Tax Credit Increases in Indian Country, With Potential for Far More.” Federal Reserve Bank of Minneapolis, 2022. <https://www.minneapolisfed.org/article/2022/take-up-of-new-markets-tax-credit-program-increases-in-indian-country-with-potential-for-far-more>.
- Gregg, Matthew, Ryan Nunn, and Casey Lozar. “An Urgent Priority: Accurate and Timely Indian Country Data.” The Federal Reserve Bank of Minneapolis, 2022. <https://www.minneapolisfed.org/article/2022/an-urgent-priority-accurate-and-timely-indian-country-data>.
- Grogan, Maura, Rebecca Morse, April Youpee-Roll. “Native American Lands and Natural Resource Development.” Revenue Watch Institute, 2011. <https://resourcegovernance.org/analysis-tools/publications/native-american-lands-and-natural-resource-development>
- Hawai‘i Island Community Health Center. “Employment – Hawai‘i Island Community Health Center.” Accessed September 7, 2022. <https://www.hicomcommunityhealthcenter.org/employment>.
- Hardee County Economic Development Council. “Functions of an Economic Development Corporation.” Accessed August 25, 2022. <https://hardeebusiness.com/resources/functions-of-an-economic-development-corporation>
- Henning, Stephanie and Anthony “Morgan” Rodman. “National Tribal Broadband Strategy.” U.S. Department of the Interior, Indian Affairs, January 15, 2021. <https://www.bia.gov/sites/default/files/dup/assets/as-ia/doc/2020.%20December.%20National%20Tribal%20Broadband%20Strategy%20FINAL-cover%20change.pdf>.
- Henson, Eric C., Miriam R. Jorgensen, Joseph P. Kalt, & Isabelle G. Leonaitis. “Assessing the U.S. Treasury Department’s Allocations of Funding for Tribal Governments under the American Rescue Plan Act of 2021.” Native Nations Institute, November 3, 2021. https://ash.harvard.edu/files/ash/files/assessing_the_u.s._treasury_departments_allocation_s_of_funding_for_tribal_governments.pdf.

Hillabrant, Walter, Judy Earp, Mack Rhoades, and Nancy Pindus. "Overcoming Challenges to Business and Economic Development in Indian Country." Princeton, NJ: Mathematica Policy Research, Inc. 2004. <http://webarchive.urban.org/publications/411104.html>.

Hiraldo, Danielle, Stephanie Russo Carroll, Dominique M. David-Chavez, Mary Beth Jäger, and Miriam Jorgensen. "Native Nation Rebuilding for Tribal Research and Data Governance." Tucson: Native Nations Institute, University of Arizona. January 1, 2020. <https://nnigovernance.arizona.edu/sites/nnigovernance.arizona.edu/files/resources/Policy%20Brief-%20Native%20Nation%20Rebuilding%20for%20Tribal%20Research%20and%20Data%20Governance.pdf>.

Ho-Chunk, Inc. "Ho-Chunk Incorporated." Accessed April 30, 2023. <https://www.hochunkinc.com>.

Homestead Community Development Corporation. "About the SCHHA." Accessed September 6, 2022. <https://hawaiianhomesteads.org/schha>.

Homestead Community Development Corporation. "Creating Jobs and Affordable Housing on Hawaiian Homelands." Accessed September 6, 2022. <https://hawaiianhomesteads.org>.

Horn-Miller, Kahente. "What Does Indigenous Participatory Democracy Look Like? Kahnawāke's Community Decision Making Process." *Review of Constitutional Studies* 18, no. 1 (2013). https://papers.ssrn.com/sol3/papers2.cfm?abstract_id=2437675.

Howard, Brian and Mikhail Sundust. "COVID-19: The Impact of Limited Internet Access and Issues with Social Distancing for Native Students." American Indian Policy Institute. Arizona State University. Accessed September 6, 2022. https://aipi.asu.edu/sites/default/files/indigenous_digital_divide_policy_brief.pdf.

Hurtado, Denny. "From the Rebuilding Native Nations Course Series: 'The Importance of Strategic Planning.'" Native Nations Institute for Leadership, Management, and Policy, University of Arizona. Tucson, Arizona, March 26, 2009. Accessed September 2, 2022. <https://nnigovernance.arizona.edu/rebuilding-native-nations-course-series-importance-strategic-planning>.

Indian Health Service. "Institutional Review Boards. Accessed April 28, 2023. <https://www.ihs.gov/dper/research/hsrp/instreviewboards>.

Indian Housing Block Grant Formula Negotiated Rulemaking Committee. "IHBG Negotiated Rulemaking Data Study Group Final Report," no. 1. July 31, 2015. https://ihbgrulemaking.org/images/Library/IHBG_Negotiated_Rulemaking_Data_Study_Group_Report_080315_Volume_I.pdf.

- Internal Revenue Service. “IRS Announces Tribal Economic Development Bonds Allocations.” U.S. Department of the Treasury. Accessed August 25, 2022. <https://www.irs.gov/tax-exempt-bonds/irs-announces-tribal-economic-development-bonds-allocations>.
- Internal Revenue Service. “Published Volume Cap Limit for Tribal Economic Development Bonds.” U.S. Department of the Treasury. Last updated May 4, 2023. <https://www.irs.gov/tax-exempt-bonds/published-volume-cap-limit-for-tribal-economic-development-bonds>.
- The Investopedia Team. “Sovereign Wealth Fund (SWF).” *Investopedia*, September 8, 2021. https://www.investopedia.com/terms/s/sovereign_wealth_fund.asp.
- Jojola, Ted. “Indigenous Planning—An Emerging Context.” *Canadian Journal of Urban Research* 17, no. 1 (2008). https://www.uwinnipeg.ca/ius/docs/cjur/37-47_Jojola.pdf.
- Jorgensen, Miriam and Randall K.Q. Akee. “Access to Capital and Credit in Native Communities: A Data Review.” Tucson, AZ: Native Nations Institute and the Arizona Board of Regents, 2017. https://nnigovernance.arizona.edu/sites/nnigovernance.arizona.edu/files/2022-09/Accessing_Capital_and_Credit_in_Native_Communities__A_Data_Review.pdf.
- Klingbeil, Kevin, and Harry Maher. “Appraisal Market Study.” South Dakota Native Homeownership Coalition. February 2, 2021. <https://www.sdnativehomeownershipcoalition.org/2019/wp-content/uploads/2019/10/SDNHC-Appraisal-Market-Study-Final-Report.pdf>.
- Kocherlakota, Narayana. “What’s Different about Economic Development in Indian Country?” Remarks at Growing Economies in Indian Country: A National Summit. Washington, DC, 2012. <https://www.minneapolisfed.org/speeches/2012/whats-different-about-economic-development-in-indian-country>.
- Kodras, Janet E. “The Changing Map of American Poverty in an Era of Economic Restructuring and Political Realignment.” *Economic Geography* 73, no. 1 (1997): 67-93. DOI: 10.1111/j.1944-8287.1997.tb00085.x.
- Kokodoko, Michael. “Enhanced Tool Maps Critical Role of Native Financial Development Institutions,” Federal Reserve Bank of Minneapolis, November 30, 2022. Accessed December 11, 2022. <https://www.minneapolisfed.org/article/2022/enhanced-tool-maps-critical-role-of-native-american-financial-institutions>.
- Kokodoko, Michou. “Making the New Markets Tax Credit work in Native communities.” Federal Reserve Bank of Minneapolis, 2017. <https://www.minneapolisfed.org/article/2011/making-the-new-markets-tax-credit-work-in-native-communities>.

- Kokodoko, Michael. “Findings from the 2017 Native CDFI Survey: Industry Opportunities and Limitations.” Center for Indian Country Development, Federal Reserve Bank of Minneapolis, November 2017. Accessed December 16, 2022. <https://www.minneapolisfed.org/~media/files/community/indiancountry/resources-education/working-papers/cicd-wp-2017-04.pdf>.
- Koran, Mario. “We’ve got to get gaming out of our blood.” *Indian Country Today*, April 5, 2022. <https://indiancountrytoday.com/news/weve-got-to-get-gaming-out-of-our-blood>.
- Kramer, Rachel, Harry Maher, Kevin Klingbeil, Nancy Pindus, Megan Knox, and Lonny Macy. “Assessment of the Housing Needs of American Indians, Alaska Natives and Native Hawaiians in Washington State.” Big Water Consulting for Washington State Department of Commerce, 2021. https://www.commerce.wa.gov/wp-content/uploads/2022/04/CommerceReports_2021_CSHD_NA-Housing_4.26.22_Final.pdf.
- Kunesh, Patrice H. “Case Study: HEARTH Act Implementation.” *Tribal Leaders Handbook on Homeownership*. Minneapolis, MN: Federal Reserve Bank of Minneapolis – Center for Indian Country Development, 2018. 88–92.
- Kunesh, Patrice H. “Getting Real about Indian Country Surprising Progress in the Heartland.” *Indian Country Today*, 2019. <https://newsmaven.io/indiancountrytoday/opinion/getting-real-about-indian-country-surprising-progress-in-the-heartland-P9OJ5PA0aECquc42NM5dYg>.
- Kunesh, Patrice H. “Lending Opportunities: Opening the Door to Homeownership in Indian Country” Written Testimony of Patrice H. Kunesh. United State Senate Committee on Indian Country, 2019. <https://www.indian.senate.gov/sites/default/files/10.16.2019%20%20Kunesh%2C%20Patrice%2C%20Testimony%20CICD%2C%20MPLS%20Fed%2C%20SCIA%20%20-%20Final.pdf>.
- Kunze, Jenna. “Indigenous Nonprofits Included in Philanthropist MacKenzie Scott’s Latest \$2.74B Round of Donations.” *Tribal Business News*. June 15, 2021. <https://tribalbusinessnews.com/sections/economic-development/13526-indigenous-nonprofits-included-in-philanthropist-mackenzie-scott-s-latest-2-74b-round-of-donations>.
- Lakota Funds. “Our Story.” Accessed January 11, 2023. <https://lakotafunds.org/about/>.
- LCO Federal Credit Union. “Welcome to LCO Federal Credit Union - Home.” Accessed September 13, 2022. <https://www.lcofcu.com/index.php>.

- Leonard, Bryan, Dominic Parker, and Terry Anderson. "Land Quality, Land Rights, and Indigenous Poverty." *Journal of Development Economics* 143, (2020): 1-24. <https://doi.org/10.1016/j.jdeveco.2019.102435>.
- Listokin, David, Kenneth Temkin, Nancy Pindus, and David Stanek. "Mortgage lending on tribal land: A Report from the Assessment of American Indian, Alaska Native, and Native Hawaiian Housing needs." U.S. Department of Housing and Urban Development, 2017. <https://www.huduser.gov/portal/publications/NAHSC-Lending.html>.
- Lofthouse, Jordan K. "Institutions and Economic Development on Native American Lands." *The Independent Review* 24, no. 2 (Fall 2019): 227-248. https://www.independent.org/pdf/tir/tir_24_2_04_lofthouse.pdf.
- Lovell, Blaze. "The Problem with Hawaiian Homestead Land? Much Of It Can't Be Developed." Honolulu Civil Beat, June 12, 2019. <https://www.civilbeat.org/2019/06/the-problem-with-hawaiian-homestead-land-much-of-it-cant-be-developed/>.
- Martinchek, Kassandra and Alexander Carther. "Native Communities Face Sustained Challenges to Building Financial Resilience." *Urban Wire*, Urban Institute, February 25, 2021. Accessed September 2, 2022. <https://www.urban.org/urban-wire/native-communities-face-sustained-challenges-building-financial-resilience>.
- Meister Economic Consulting. "The Economic Impact of Tribal Gaming: A State-by-State Analysis." American Gaming Association. November 2018. <https://www.americangaming.org/wp-content/uploads/2018/11/Economic-Impact-of-Tribal-Gaming-Two-Page-11.5.18.pdf>.
- Meit, Michael, Katherine Meyer, Tess Gilbert, Jennie Alfaro, Sara Levintow, Carol Hafford, Alana Knudson, Aleena Hernandez, Theresa Carino. "Higher Education & Workforce Development in Tribal Communities & the Role of Tribal HPOG." Office of Planning, Research & Evaluation, Office of the Administration for Children & Families, July 2015. www.acf.hhs.gov/sites/default/files/documents/opre/hpog_practice_brief_higher_education_and_workforce_development_in_0.pdf.
- NACDC. "Native American Community Development Corporation." 2008. <https://nacdc.org/about.html>.
- Naeth, M. Anne, P. Michael Rutherford, Allen M. Jobson. "Soil Reclamation and Remediation of Disturbed Lands." University of Saskatchewan, August 12, 2021. Accessed September 6, 2022. <https://openpress.usask.ca/soilscience/chapter/soil-reclamation-and-remediation-of-disturbed-lands>.
- National American Indian Housing Council. "About the National American Indian Housing Council." Accessed September 6, 2022. <https://naihc.net/about-2>.

The National Center for American Indian Enterprise Development. “About NCAIED: The National Center for American Indian Enterprise Development.”
<https://www.ncaied.org/about>.

National Congress of American Indians. “About NCAI.” NCAI.org, accessed September 6, 2022. <https://www.ncai.org/about-ncai>.

National Congress of American Indians. “Economic Development & Commerce.” Accessed September 6, 2022. <https://ncai.org/policy-issues/economic-development-commerce>.

National Congress of American Indians. “Tribal Infrastructure: Investing in Indian Country for a Stronger America.” 2017. <https://www.ncai.org/NCAI-InfrastructureReport-FINAL.pdf>.

National Congress of American Indians. “Workforce Development: Building the Human Capacity to Rebuild Tribal Nations.” Accessed September 1, 2022. <https://www.ncai.org/ptg/workforce-development>.

National Telecommunications and Information Administration. “TBCP Awards.” Accessed April 28, 2023. <https://broadbandusa.maps.arcgis.com/apps/dashboards/07f987529ae24273aec3320e5033d503>.

Native American Indian Housing Council. “NAIHC 2022 Legal Symposium.”
<https://naihc.net/legal-symposium>.

Native American Finance Officers Association. “About NAFOA.” NAFOA, accessed August 5, 2022. <https://nafoa.org/about>.

Native American Finance Officers Association. “NAFOA Institute.” <https://nafoa.org/institute>.

Native American Financial Services Association. “Native-owned Banks and Credit Unions: Serving the Underserved.” February 5, 2019. <https://nativefinance.org/news/native-owned-banks-and-credit-unions-serving-the-underserved>.

Native American Indian Housing Council. “NAIHC 2022 Legislative Conference.”
<https://web.cvent.com/event/5312605d-98d4-413e-bc91-f9e245470cee/summary>.

Native CDFI Network. “Native CDFI Network.” Accessed December 11, 2022. <https://nativecdfi.net>.

National Credit Union Administration. “Minority Depository Institutions.” Accessed April 10, 2023. March 17, 2023. <https://ncua.gov/support-services/credit-union-resources-expansion/resources/minority-depository-institution-preservation/mdi>.

- Native Knot. “Native Credit Unions Provide Needed Services for Tribal Communities.” *Native Knot*, April 18, 2019. <https://www.nativeknot.com/news/Native-American-News/Native-Credit-Unions-Provide-Needed-Services-for-Tribal-Communit.html>.
- Native Nations Institute. “Access to Capital and Credit in Native Communities.” 2016. http://nni.arizona.edu/application/files/8214/6378/9056/Access_to_Capital_and_Credit_in_Native_Communities.pdf.
- Navajo-Hopi Observer. “Grand Canyon West reaches 1 million visitors, gearing up for 2016 tourism.” January 12, 2016. Accessed December 12, 2022. <https://www.nhnews.com/news/2016/jan/12/grand-canyon-west-reaches-1-million-visitors-gear/>.
- NCAI Policy Research Center. “Differential Privacy and the 2020 U.S. Decennial Census: Impact on American Indian and Alaska Native Data.” National Congress of American Indians. September 2019. https://www.ncai.org/prc/2020_Census_and_AIAN_data_FINAL_9_11_2019.pdf.
- NCAI Policy Research Center. “Tribal Insights Brief: Higher Education & Workforce Development: Leveraging Tribal Investments to Advance Community Goals.” National Congress of American Indians. June 18, 2012. https://www.ncai.org/resources/ncai_publications/tribal-insights-brief-higher-education-workforce-development-leveraging-tribal-investments-to-advance-community-goals
- New Market Tax Credits Coalition. “Alaska – New Markets Tax Credit Coalition.” Accessed September 7, 2022. <https://nmtccoalition.org/state/alaska>.
- New Markets Tax Credit Coalition. “Winnebago Educare.” July 29, 2021. Accessed September 7, 2022. <https://nmtccoalition.org/project/winnebago-educare>.
- Novogradac. “2022 QAPs and Applications.” Accessed August 24, 2022. <https://www.novoco.com/resource-centers/affordable-housing-tax-credits/2022-qaps-and-applications>.
- Oklahoma Native Impact Study. “Oklahoma Native Impact.” 2019. <https://www.oknativeimpact.com>.
- Office of Native American Programs. “ONAP National Best Practice Webinar: Featuring Blackfeet Housing.” U.S. Department of Housing and Urban Development. March 4, 2020. <https://www.hud.gov/sites/dfiles/PIH/documents/National%20Webinar%20Blackfeet%20Housing%20HUDVASH%20FINAL.pdf>.

- Oxendine, Chex. “Barriers to Tribal Economic Development Hinge on Sovereignty-related Issues.” *Tribal Business News*. April 11, 2022.
<https://www.tribalbusinessnews.com/sections/economic-development/13861-barriers-to-tribal-economic-development-hinge-on-sovereignty-related-issues>.
- PD&R Edge. “Innovative Funding Provides Culturally Specific Affordable Housing to Native Americans.” U.S. Department of Housing and Urban Development, 2021.
<https://www.huduser.gov/portal/pdredge/pdr-edge-inpractice-072621.html>.
- Pedersen, Brendan. “Ignored by banks, Indigenous communities build their own financial system.” University of Arizona, July 14, 2021. Accessed September 6, 2022.
https://nnigovernance.arizona.edu/sites/default/files/resources/2021%20American%20Banker_0.pdf.
- Perez, Rob, and Agnel Philip. “To Reclaim Ancestral Land, All Native Hawaiians Need Is a \$300,000 Mortgage and to Wait in Line for Decades.” ProPublica, October 24, 2020.
<https://www.propublica.org/article/hawaii-native-land-homesteads-department-of-hawaiian-home-lands>.
- Perry, Steven W., Michael B. Field and Amy D. Lauger. “Tribal Courts in the United States, 2014 – Statistical Tables.” Bureau of Justice Statistics, July 2021.
https://bjs.ojp.gov/sites/g/files/xyckuh236/files/media/document/tcus14st_0.pdf.
- Peterson, Steven. “Tribal Economic Impacts: The Economic Impacts of the Five Idaho Tribes on the Economy of Idaho.” The Five Tribes of Idaho, January 2015.
<https://www.sde.idaho.gov/indian-ed/files/curriculum/Idaho-Tribes-Economic-Impact-Report.pdf>.
- Pettit, Kathy, G. Thomas Kingsley, Jennifer Biess, Kassie Bertumen, Nancy Pindus, Chris Narducci, & Amos Budde. “Continuity and Change: Demographic, Socioeconomic, and Housing Conditions of American Indians and Alaska Natives.” U.S. Department of Housing and Urban Development Office of Policy Development and Research, 2014.
https://www.huduser.gov/portal/publications/commdevl/housing_conditions.html.
- Pieratos, Nikki. “Native Credit Unions: A Middle Path for Building Financial Access and Capability in Native Communities.” Federal Reserve Bank of Minneapolis, February 15, 2019. <https://www.minneapolisfed.org/article/2019/native-credit-unions-a-middle-path-for-building-financial-access-and-capability-in-native-communities>.
- Phillips, Rhonda and Robert H. Pittman, eds. *An Introduction to Community Development*. New York: Routledge 2009.

- Pindus, Nancy, and Brady Meixeil, “Why Opportunity Zones are Important for Indian Country.” June 7, 2018. <https://www.urban.org/urban-wire/why-opportunity-zones-are-important-indian-country>.
- Pindus, Nancy, and Kevin Klingbeil. “Tribes are Using Creative Place-Based Solutions to Increase Homeownership Options.” *Housing Matters*, Urban Institute, 2019. <https://housingmatters.urban.org/articles/tribes-are-using-creative-place-based-solutions-increase-homeownership-options>.
- Pindus, Nancy, G. Thomas Kingsley, Jennifer Biess, Diane Levy, Jasmine Simington, & Christopher Hayes. “Housing Needs of American Indians and Alaska Natives in Tribal Areas: A Report From the Assessment of American Indian, Alaska Native, and Native Hawaiian Housing Needs.” U.S. Department of Housing and Urban Development Office of Policy Development and Research, 2017. <https://www.huduser.gov/portal/sites/default/files/pdf/HNAIHousingNeeds.pdf>.
- Rees, Jill. “USDA Announces Funding for New School Complex for the Confederated Tribes of the Warm Springs Reservation.” U.S. Department of Agriculture. June 19, 2013. <https://www.rd.usda.gov/newsroom/news-release/usda-announces-funding-new-school-complex-confederated-tribes-warm-springs>.
- Rendon, Jim. “\$5B Conservation Plan Offers New Approach, But Faces Hurdles.” *AP News*. September 28, 2021. <https://apnews.com/article/climate-change-science-business-philanthropy-oceans-6ca70181c532be88358cbdda72dce1e>.
- RES 2022 - Reservation Economic Summit. “About the Summit | The National Center for American Indian Enterprise Development | RES 2022.” Accessed September 13, 2022. <https://res.ncaied.org/Summit-Info/About>.
- Resource Development Council for Alaska. “Native Corporations Overview.” Accessed September 6, 2022. <https://www.akrdc.org/alaska-native-corporations>.
- Rhodes, Dean. “Tribe Receives \$800,000 EPA Grant to Clean up Blue Heron Site.” *Smoke Signals*, May 13, 2021. Accessed September 6, 2022. <https://www.smokesignals.org/articles/2021/05/13/tribe-receives-800-000-epa-grant-to-clean-up-blue-heron-site>.
- Rioseco, Ari. “Tribe Creates Sovereign Wealth Fund.” *The Seminole Tribune*, November 5, 2022. <https://seminoletribune.org/tribe-creates-sovereign-wealth-fund>.
- Sanchez, Gabriel R., Robert Maxim, and Raymond Foxworth. “The monthly jobs report ignores Native Americans. How are they faring economically?” *The Avenue*. Brookings. November 10, 2021. <https://www.brookings.edu/blog/the-avenue/2021/11/10/the-monthly-jobs-report-ignores-native-americans-how-are-they-faring-economically>.

- San Pasqual Economic Development Corporation. “Who We Are.” Accessed April 30, 2023. <https://sanpasqualedc.com>.
- Sagg, Erla. “About NAIHC.” National American Indian Housing Council.” Accessed September 6, 2022. <https://naihc.memberclicks.net/about-naihc>.
- Schinasi, Katherine V. “Alaska Native Corporations: Increased Use of Special 8(a) Provisions Calls for Tailored Oversight.” U.S. Government Accountability Office, September 19, 2007. <https://www.gao.gov/assets/gao-07-1251t.pdf>.
- Scott, Andrew P. “An Overview of Rural Credit Markets.” Washington, DC: Congressional Research Service, September 2021. <https://crsreports.congress.gov/product/pdf/R/R46914>.
- Scott, MacKenzie. “Seeding by Ceding.” *Medium*. June 15, 2021. <https://mackenzie-scott.medium.com/seeding-by-ceding-ea6de642bf>.
- Segal, Troy. “Tax Credit.” *Investopedia*, January 27, 2022. <https://www.investopedia.com/terms/t/taxcredit.asp>.
- Sicangu Co. “About Us: REDCO: Rosebud Economic Development Corporation.” Accessed September 6, 2022. <https://www.sicangucorp.com/about-us-1>.
- Sicangu Co. “Growing Lakota Knowledge, Building Lifelong Skills, Making Memories.” Accessed September 9, 2022. <https://www.sicangu.co/news/growing-lakota-knowledge>.
- Sicangu Co. “Rosebud-Based Ecosystem Re-Brands as Sicangu Co.” Accessed September 8, 2022. <https://www.sicangucorp.com/post/rosebud-based-ecosystem-re-brands-as-sic-a%C6%9Eg-u-co>.
- Sicangu Co. “Rosebud Construction.” Accessed September 6, 2022. <https://www.sicangu.co/construction>.
- SNIFCU. “Membership Eligibility - Seneca Nation of Indians Federal Credit Union.” Accessed September 13, 2022. <https://www.snifcu.org/membership.php/#HTJ>.
- Southern Ute Growth Fund. “Business Areas.” Accessed September 6, 2022. <https://www.sugf.com/business>.
- Southern Ute Indian Tribe. “Red Willow Production Company.” Accessed September 6, 2022. <https://www.rwpc.us>.
- Substance Abuse and Mental Health Services Administration. “Circles of Care.” U.S. Department of Health & Human Services. Accessed January 13, 2023. <https://www.samhsa.gov/tribal-ttac/circles-care>.

Tammaro, Alex. “Native Data Sovereignty Can Address Data Gaps and Improve Equity.” *Urban Wire*. Urban Institute. June 13, 2022. <https://www.urban.org/urban-wire/native-data-sovereignty-can-address-data-gaps-and-improve-equity>.

Tax Notes. “Lawmakers Call for Expanded NMTC Access for Native Communities.” *Tax Notes*. September 28, 2020. <https://www.taxnotes.com/research/federal/legislative-documents/congressional-tax-correspondence/lawmakers-call-for-expanded-nmtc-access-for-native-communities/2d088>

Theodos, Brett, Brady Meixeil, and Carl Hedman. “Did States Maximize Their Opportunity Zone Selections?” May 18, 2018. Revised July 18, 2018. https://www.urban.org/sites/default/files/publication/98445/did_states_maximize_their_opportunity_zone_selections_7.pdf.

Todd, Richard M. “Industry Concentration of Jobs Highlights Economic Diversification Opportunity in Indian Country.” Center for Indian Country Development, Federal Reserve Bank of Minneapolis, 2018. <https://www.minneapolisfed.org/article/2018/industry-concentration-of-jobs-highlights-economic-diversification-opportunity-in-indian-country><https://www2.census.gov/ces/wp/2018/CES-WP-18-50.pdf>.

Trahant, Mark. “At The Crossroads: State of the Economy in Indian Country.” *Indian Country Today*, 2022. <https://indiancountrytoday.com/news/at-the-crossroads-state-of-the-economy-in-indian-country>.

Tribal Business News Staff, “Office of Indian Economic Development Opens Applications for Tribal Tourism Grants Program.” *Tribal Business News*, August 23, 2021. Accessed September 6, 2022. <https://tribalbusinessnews.com/sections/tourism/14001-office-of-indian-economic-development-opens-applications-for-tribal-tourism-grants-program>.

Tribal Government Gaming. “Financial Roundtable: Economic Diversification in Indian Country.” *Tribal Government Gaming*, March 6, 2020. <https://tribalgovernmentgaming.com/article/financial-roundtable-economic-diversification-in-indian-country>.

Tribal Government Gaming. “True Economic Diversification Financial Roundtable: Economic Diversification in Indian Country.” *Tribal Government Gaming*, 2020. <https://tribalgovernmentgaming.com/article/true-economic-diversification>.

- U.S. Department of Agriculture. “All Programs.” Accessed on September 13, 2022. <https://www.rd.usda.gov/programs-services/all-programs>.
- U.S. Department of Agriculture. “Business & Industry Loan Guarantees.” Accessed September 13, 2022. <https://www.rd.usda.gov/programs-services/business-programs/business-industry-loan-guarantees>.
- U.S. Department of Agriculture. “Community Facilities Guaranteed Loan Program.” Accessed September 13, 2022. <https://www.rd.usda.gov/programs-services/community-facilities/community-facilities-guaranteed-loan-program>.
- U.S. Department of Agriculture. “Housing Support Programs Across the Federal Government.” September, 2016. <https://www.usda.gov/sites/default/files/documents/housing-support-programs-federal-government.pdf>.
- U.S. Department of Agriculture. “Intermediary Relending Program.” Accessed April 11, 2023. <https://www.rd.usda.gov/programs-services/business-programs/intermediary-relending-program>.
- U.S. Department of Agriculture. “OneRD Guarantee Loan Initiative Lender Guide.” November 4, 2020. <https://www.rd.usda.gov/sites/default/files/OneRDLenderGuide.pdf>.
- U.S. Department of Agriculture. “ReConnect Loan and Grant Program.” Accessed August 24, 2022, <https://www.usda.gov/reconnect>.
- U.S. Department of Agriculture. “Rural America At A Glance.” 2018. <https://www.ers.usda.gov/webdocs/publications/90556/eib-200.pdf>.
- U.S. Department of Agriculture. “Rural Business Development Grants (RBDG).” December 2019. https://www.rd.usda.gov/sites/default/files/fact-sheet/508_RD_FS_RBS_RBDG.pdf.
- U.S. Department of Agriculture. “Rural Innovation Stronger Economy (RISE) Grants.” Accessed April 11, 2023. <https://www.rd.usda.gov/programs-services/business-programs/rural-innovation-stronger-economy-rise-grants>.
- U.S. Department of Agriculture. “Rural Microentrepreneur Assistance Program.” Accessed April 11, 2023. <https://www.rd.usda.gov/programs-services/business-programs/rural-microentrepreneur-assistance-program>.
- U.S. Department of Agriculture. “Single Family Housing Direct Home Loans.” Accessed April 11, 2023. <https://www.rd.usda.gov/programs-services/single-family-housing-programs/single-family-housing-direct-home-loans>.

- U.S. Department of Agriculture. “USDA Meeting the Needs of a Rural Day Care Center.” December 2020. https://www.rd.usda.gov/sites/default/files/success-story/SD_SuccessStory_WagnerDayCareFinal.pdf.
- U.S. Department of Commerce. “FY 2023 EDA Public Works and Economic Adjustment Assistance Programs.” March 14, 2023. <https://www.grants.gov/web/grants/view-opportunity.html?oppId=346815>.
- U.S. Department of Commerce. “U.S. Department of Commerce Invests Approximately \$45 Million to Grow the Indigenous Finance Sector in Montana, North Dakota, South Dakota, Wyoming Through American Rescue Plan Regional Challenge.” September 2, 2022. Accessed September 14, 2022. <https://www.eda.gov/news/press-release/2022/09/02/us-department-commerce-invests-approximately-45-million-grow>.
- U.S. Department of Energy. “Fond Du Lac Band Poised to Double 2020 Clean Energy Goal.” September 27, 2016. Accessed September 7, 2022. <https://www.energy.gov/indianenergy/articles/fond-du-lac-band-poised-double-2020-clean-energy-goal>.
- U.S. Department of Health and Human Services. “Social and Economic Development Strategies -SEDS.” April 6, 2021. <https://www.grants.gov/web/grants/view-opportunity.html?oppId=329546>.
- U.S. Department of Housing and Urban Development. “FY 2021 Indian Community Development Block Grant.” Accessed August 24, 2022. <https://www.hud.gov/sites/dfiles/PA/documents/ICDBG-Competitive-Awards-2022.pdf>.
- U.S. Department of Housing and Urban Development. “Indian Community Development Block Grant Program.” Accessed August 24, 2022, https://www.hud.gov/program_offices/public_indian_housing/ih/grants/icdbg.
- U.S. Department of Housing and Urban Development. “Indian Housing Block Grant Program,” Accessed August 24, 2022. https://www.hud.gov/program_offices/public_indian_housing/ih/grants/ihbg.
- U.S. Department of Housing and Urban Development. “Section 184 Indian Home Loan Guarantee Program.” Accessed January 11, 2023. <https://www.hud.gov/section184>.
- U.S. Department of the Interior. “Benefits of Trust Land Acquisition (Fee to Trust).” Accessed April 27, 2023. <https://www.bia.gov/service/trust-land-acquisition/benefits-trust-land-acquisition>.

- U.S. Department of the Interior. “Homestead & Beneficiary Associations: Frequently Asked Questions.” Accessed September 6, 2022. <https://www.doi.gov/hawaiian/homestead-beneficiary-associations-faq>.
- U.S. Department of the Interior. “Land Buy-Back Program for Tribal Nations: About.” Accessed January 10, 2023. <https://www.doi.gov/buybackprogram/about>.
- U.S. Department of the Treasury. "Community Reinvestment Act Regulations." *Federal Register* Vol. 85, no. 109 (June 5, 2020): 34734-34834. <https://www.govinfo.gov/content/pkg/FR-2020-06-05/pdf/2020-11220.pdf>.
- U.S. Department of the Treasury. “Fact Sheet: Four Ways the Inflation Reduction Act’s Tax Incentives Will Support Building an Equitable Clean Energy Economy.” 2022. <https://home.treasury.gov/system/files/136/Fact-Sheet-IRA-Equitable-Clean-Energy-Economy.pdf>.
- U.S. Department of the Treasury. “Treasury Department Fact Sheet: Tribal Economic Development Bonds.” 2014. <https://www.irs.gov/pub/irs-tege/Tribal%20Economic%20Development%20Bonds%20Fact%20sheet%202014.pdf>.
- U.S. Department of the Treasury. “Tribal Economic Development Bonds Fact Sheet 2014.” Accessed August 25, 2022. <https://home.treasury.gov/system/files/136/Tribal-Economic-Development-Bonds-Fact-sheet-2014.pdf>.
- U.S. Economic Development Administration. “2022 Build to Scale Program Notice of Funding Opportunity.” May 2022. <https://www.eda.gov/sites/default/files/2022-05/FY22-Build-to-Scale-NOFO.pdf>.
- U.S. Economic Development Administration. “CARES Act Economic Recovery Corps and Equity Impact Investments.” Accessed August 24, 2022. <https://www.grants.gov/web/grants/view-opportunity.html?oppId=341163>.
- U.S. Economic Development Administration. “Fiscal Year 2021-2023 EDA Planning and Local Technical Assistance Program.” Accessed January 13, 2023. <https://www.eda.gov/funding/funding-opportunities/fiscal-year-2021-2023-eda-planning-and-local-technical-assistance>.
- U.S. Economic Development Administration. “Funding Opportunities.” Accessed August 24, 2022. <https://eda.gov/funding-opportunities>.
- U.S. Economic Development Administration. “U.S. Department of Commerce Invests \$1 Million in American Rescue Plan Funds to Support Construction of Tribal Health Center on Rocky Boy Reservation.” August 16, 2022. Accessed September 6, 2022. <https://eda.gov/news/press-releases/2022/08/16/rocky-boy-reservation.htm>.

- U.S. Government Accountability Office. “Breaking Down Barriers to Broadband Access.” *GAO Watch Blog*. August 11, 2022. <https://www.gao.gov/blog/breaking-down-barriers-broadband-access>.
- U.S. Government Accountability Office. “Data Use and Regulatory Status of the Indian Housing Block Grant Program.” GAO-15-353R. Washington, DC: U.S. March 10, 2015. <https://www.gao.gov/products/gao-15-353r>.
- U.S. Government Accountability Office. “Indian Economic Development: Relationship to EDA Grants and Self-determination Contracting Is Mixed.” September 08, 2004. <https://www.gao.gov/assets/gao-04-847.pdf>.
- U.S. Government Accountability Office. “Treaty of Guadalupe Hidalgo: Definition and List of Community Land Grants in New Mexico.” GAO-01-951. September 2001. Accessed September 2, 2022. <https://www.gao.gov/assets/gao-01-951.pdf>.
- U.S. Government Accountability Office. “Tribal Economic Development: Action is Needed to Better Understand the Extent of Federal Support: Report to Congressional Committees.” GAO-22-105215. Washington, DC: U.S. 2022. <https://www.gao.gov/products/gao-22-105215>.
- U.S. Small Business Administration. “504 Loans.” Accessed September 9, 2022. <https://www.sba.gov/funding-programs/loans/504-loans>.
- U.S. Small Business Administration. “7(a) Loans.” Accessed September 9, 2022. <https://www.sba.gov/funding-programs/loans/7a-loans>.
- U.S. Small Business Administration. “8(a) Business Development program.” Accessed September 13, 2022. <https://www.sba.gov/federal-contracting/contracting-assistance-programs/8a-business-development-program>.
- Van Haecke, Michele. “Native American Construction on the Rise.” *ENRSouthwest*, May 1, 2010. <https://www.enr.com/articles/23503-native-american-construction-on-the-rise>.
- Vogel, Lakota. “Developing a Healthy Economy | Cheyenne River.” The Architectural League of New York, September 11, 2020. Accessed September 6, 2022, <https://archleague.org/article/cheyenne-river-reservation-healthy-economy>.
- Wakeling, Stewart, Miriam Jorgensen, Susan Michaelson, Manley Begay. “Policing on American Indian Reservations.” U.S. Department of Justice, July 2001. <https://www.ojp.gov/pdffiles1/nij/188095.pdf>.

- Wallace, Alicia. "The US will now break out jobs data for Native Americans." *CNN Business*. March 5, 2022. <https://www.cnn.com/2022/03/05/economy/native-american-monthly-employment-data/index.html>.
- Ward Williams, "Native American-Owned Banks by State," *Investopedia*, April 2, 2022. <https://www.investopedia.com/native-american-owned-banks-by-state-5085713>.
- Waseyabek Development Company LLC. "Michigan Non-Gaming Tribal Economic Impact Study." Accessed September 14, 2022. <https://waseyabek.com/eis>.
- Washington State Health Care Authority. "Tax Sharing Compact Between The Tulalip Tribe and the State of Washington." 2020. <https://www.hca.wa.gov/assets/program/tax-sharing-compact-tulalip-tribes-of-wa-and-wa-state.pdf>.
- Washington Tribes. "Tribes Are Investing in Washington." Accessed September 10, 2022. <https://www.washingtontribes.org/economic-impact>.
- Wells Fargo. "Indian Country's Once-in-a-Seven-Generation Opportunity." 2022. <https://www08.wellsfargomedia.com/assets/pdf/commercial/focus/2022-tribal-economic-resiliency-report-0929.pdf>.
- The White House. "Fact Sheet: Biden-Harris Administration Releases Tribal Playbook, Announces Massive New Tribal Funding from Bipartisan Infrastructure Law." May 31, 2022. <https://www.whitehouse.gov/briefing-room/statements-releases/2022/05/31/fact-sheet-biden-harris-administration-releases-tribal-playbook-announces-massive-new-tribal-funding-from-bipartisan-infrastructure-law>.
- Winchell, Dick G. "Indigenous Rural Renewal in the Inland Pacific Northwest: The Emergence of American Indian Tribes in Regional Economic Development." *Journal of Rural and Community Development* 8, no. 3 (2013): 174-197. <https://journals.brandonu.ca/jrcd/article/view/1036/253>.
- Woodrow, Sue. "Tribal sovereign immunity: An obstacle for non-Indians doing business in Indian Country?" Federal Reserve Bank of Minneapolis. July 1, 1998. <https://www.minneapolisfed.org/article/1998/tribal-sovereign-immunity-an-obstacle-for-nonindians-doing-business-in-indian-country>.
- Woodrow, Susan. "Uniform Commercial Codes: Bringing Business to Indian Country. Tribal Secured Transactions Laws: A Working Forum." Presentation, 2013. Retrieved on September 8, 2022. https://www.bia.gov/sites/default/files/dup/assets/as-ia/ieed/pdf/idc1-024558_508.pdf.

Annotated Bibliography³⁸¹

Adams, Hank, John Echohawk, Dough Nash, Kevin Gover, and Roman Bitsuie. "Report on Trust Responsibilities and the Federal-Indian Relationship; Including Treaty Review. Final Report to the American Indian Policy Review Commission., Section VI Oklahoma" HathiTrust. American Indian Policy Review Commission, 1976.
<https://babel.hathitrust.org/cgi/pt?id=uc1.31210015689068&view=1up&seq=1&skin=2o21>.

This is the final report prepared by the American Indian Policy Review Commission in 1976. Congress charged the Commission with conducting a comprehensive review of Indian Affairs in the U.S., including "a study and analysis of the Constitution, treaties, judicial interpretations and Executive Orders to determine the attributes of the unique relationships between the federal government and Indian tribes and the land and other resources they possess." The report covers federal Indian law, trust law, and treaty law, as well as Oklahoma, water use and development, and forestry. It is based on a review of historical documents, field studies, hearings, site visits, conferences, and Indian reservation community interviews. The report finds that the history of legal concepts and policy applications in the field of Indian Affairs discloses a constant stream of abandonment and abuses of law within the executive, legislative, and judicial processes of America. It recommends a path towards a positive and promising future for the Native American people within the United States. It explores the concepts of sovereignty, treaties, and trust relations and trust responsibilities and illustrates the differences among tribes and some of the factors related to outside finance. The report also recognizes the importance of economic development and access to sufficient capital to allow for development programs compatible with the environment of the tribal area.

Akee, Randall K.Q., Eric C. Henson, Miriam R. Jorgensen, Joseph P. Kalt. "Policy Brief: Dissecting the U.S. Treasury Department's Round 1 Allocations of CARES Act COVID-19 Relief Funding for Tribal Governments." Cambridge and Tucson: Harvard Project for American Indian Economic Development and Native Nations Institute, 2020.
<https://nnigovernance.arizona.edu/sites/default/files/resources/Dissecting%20the%20US%20Treasury%20Department%E2%80%99s%20Round1%20Allocations%20of%20CAR ES%20Act%20COVID%E2%80%9019%20Relief%20Funding%20for%20Tribal%20Governments.pdf>

This policy brief was conducted by the Harvard Project for American Indian Economic Development and Native Nations Institute. This resource looks at Treasury's allocation of CARES funding to tribal governments, and seeks to understand the extent to which

³⁸¹ Note that some of the sources listed here are not directly referenced in the final report but are included as important context for understanding community economic development in Indian Country.

reusing the IHBG formula impacts CARES funding outcomes. This brief analyzes the HUD IHBG formula, Census data, and tribal data to compare populations using different datasets and concludes that different datasets result in different funding allocations. It highlights the complications of using existing data for assessing tribal needs. The authors conclude that an appropriate allocation rule would employ the current tribal enrollment figures submitted by tribes to Treasury.

Akee, Randall. "Sovereignty and Improved Economic Outcomes for American Indians: Building on the Gains Made Since 1990." *Washington Center for Equitable Growth*, 2021. <https://equitablegrowth.org/sovereignty-and-improved-economic-outcomes-for-american-indians-building-on-the-gains-made-since-1990>.

This essay provides an overview of the economic status within Indian Country, including recommendations for improving the economic well-being of American Indians. This resource supports the exercise of tribal sovereignty and the expansion of innovative industries on reservations to increase revenue. In addition, the report recommends that steps should be taken to reduce obstacles to economic development on tribal lands, including by providing funding for educational institutions on tribal reservations to develop skills and reduce the barrier to entry for economic development. The source also recommends increasing data collection efforts to include the American Indian population in nationally representative datasets.

American Indian Policy Review Commission. "Report of Special Joint Task Force on Alaska Native Issues." American Indian Policy Review Commission, 1976. <https://babel.hathitrust.org/cgi/pt?id=purl.32754070365295&view=1up&seq=3&skin=2021>

This report is an extension of the 1976 Report on Reservation and Resource Development and Protection administered by the Indian Policy Review commission. It provides historical background of economic development specifically for Alaska Natives. The report looks at the relationship between Alaska Native tribes and the federal government.

Bowman, Michelle. W. "Engagement, Research and Policy: Integrating Indigenous Voices into Economic Inclusion at the Federal Reserve." Federal Reserve Board, November 29, 2021. <https://www.federalreserve.gov/newsevents/speech/bowman20211129a.htm>. This speech by Governor Michelle W. Bowman at the Virtual Symposium on Indigenous Economies details the current state of Native banking, the importance of including Native voices in banking, and the federal government's relationship to Native banking. Her talk considers the unique challenges of financial institutions in Native communities. Bowman states that "bank branches are harder to find in Indian Country. Credit is often more expensive for reasons not fully explained by available borrower characteristics alone."

She notes that in response, the number of Native-led Community Development Financial Institutions (CDFIs) has quadrupled over the past two decades. While Native CDFIs cannot singlehandedly resolve Indian Country's credit needs, “research and pilot programs demonstrate the power of cultural fit as they bring credit, financial services, and consumer education into tribal communities.”

Brashares, Edith, and Siobhan O’Keefe. “Indian Tribal Government Access to Tax-Exempt Bond Financing.” U.S. Department of the Treasury, October 27, 2013.

<https://ssrn.com/abstract=2370079> or <http://dx.doi.org/10.2139/ssrn.2370079>

This paper provides background information on the tax rules for the use of tax-exempt bonds by tribal governments. The authors use an analysis of IRS Statistics of Income (SOI) data to look at how tax incentives are used by tribes. According to the findings, tribes with resources such as gaming income or energy resource royalties, as well as tribes with members in need, are more likely to borrow using tax-exempt bonds.

However, tribes with populations that have the greatest need, as measured by their SNAP population and poverty rate, may be more likely to use tax-exempt bonds to finance tribal government investment.

Buteau, Ellie, Hannah Martin, and Katarina Malmgren. “Overlooked (Part Two): Foundation Support for Native American Leaders and Communities.” Center for Effective Philanthropy, 2021. http://cep.org/wp-content/uploads/2021/07/CEP_Overlooked_Native_American.pdf.

This report is based on research by the Center for Effective Philanthropy (CEP) including survey data and interviews with Native nonprofit leaders. CEP found that Native nonprofit leaders report having fewer positive experiences with their foundation funders than nonprofit leaders of other races/ethnicities, which has been the case since prior to the COVID-19 pandemic. Almost two thirds of foundation leaders say that they provide little or no grant dollars to organizations primarily serving Native American communities. The report also highlights that most foundations continue to overlook nonprofits that serve Native American communities, including rural tribal lands, despite the significant challenges facing Native American communities. The report concludes with advice for funders working with tribal communities.

Ciampoli, Paul. “SRP, Navajo Tribal Utility Authority Extend Solar Agreement, Sign New Solar Contract.” SRP, Navajo Tribal Utility Authority Extend Solar Agreement, Sign New Solar Contract | American Public Power Association. [PublicPower.org](https://www.publicpower.org/periodical/article/srp-navajo-tribal-utility-authority-extend-solar-agreement-sign-new-solar-contract), 2022.

<https://www.publicpower.org/periodical/article/srp-navajo-tribal-utility-authority-extend-solar-agreement-sign-new-solar-contract>.

This online news article focuses on the contract expansion of Navajo Nation’s large-scale solar farm, also known as the “Kayenta” facilities. The agreement was signed between officials with the Navajo Tribal Utility Authority (NTUA), leaders of the Navajo Nation, and the state of Arizona’s Salt River Project (SRP). This project will assist in the development of the Navajo Nation through the generation of around \$15 million in tax revenues, and help transition their economy away from coal-dependency.

Corey, Kristen, Jennifer Biess, Nancy Pindus, and Doray Sitko. “Housing Needs of Native Hawaiians: A Report From the Assessment of American Indian, Alaska Native, and Native Hawaiian Housing Needs.” U.S. Department of Housing and Urban Development, 2017. <https://www.huduser.gov/portal/publications/housing-needs-native-hawaiians.html>. This report focuses on the housing conditions of the Native Hawaiian community in Hawaii. The report describes housing conditions on the Hawaiian Home Lands, presents comparisons with the population of Hawaii as a whole, and provides a history of federal policies affecting land and housing of Native Hawaiians living in Hawaii. It illustrates that the Native Hawaiian homeownership rate lags behind that of residents of Hawaii at large.

Cornell, Stephen and Joseph P. Kalt. “Two Approaches to Economic Development on American Indian Reservations: One Works, the Other Doesn’t.” *Joint Occasional Papers on Native Affairs*, (2006). https://www.honigman.com/media/site_files/111_imgimgjopna_2005-02_Approaches.pdf. This working paper analyzes two common approaches to economic development in Indian Country: the “standard” approach and the “nation-building” approach. In the view of the authors, the standard approach is more common historically but less successful, and involves short-term thinking and outside actors driving decision-making. The nation-building approach, alternatively, is rooted in Native self-determination, strategic planning, and long-term goals.

Cunningham, Alisa, F. “Tribal College Contributions to Local Economic Development.” Institute for Higher Education Policy, Washington, DC.; American Indian Higher Education Consortium, Alexandria, CA, 2000. http://www.aihec.org/our-stories/docs/reports/TC_contributionsLocalEconDevmt.pdf. This report examines the role that tribal colleges play in entrepreneurship and small business development in Native communities. The report’s objective is to understand how tribal colleges impact local economic development in Indian Country using the analysis of case studies and literature reviews. While published in 2000, the resource remains valuable because it highlights instances where the introduction of Native values and local traditions into entrepreneurial training led to greater success and economic

development than those that did not, and includes a list of procedures for policymakers to advance community development efforts in tribal colleges.

Fogarty, Mark. “New Markets Tax Credit Program only now getting off the ground in Indian Country.” Tribal Business News Home, 2022.

<https://tribalbusinessnews.com/sections/economic-development/13921-new-markets-tax-credit-program-only-now-getting-off-the-ground-in-indian-country>.

This article seeks to understand why growth in NMTC Native Areas is so slow in regards to the development and distribution of NMTCs through the collection of interviews and Native NMTC data. The author finds that for every \$100 allocated for NMTC investments, only \$1 is being directed towards Native tribal entities, despite the fact that there is a disproportionately high amount of tracts in NMTC Native Areas that are eligible for NMTC investment. This resource illustrates the need for NMTC investment in NMTC Native Areas, and the direction of attention to increase Native NMTC recipients.

Fogarty, Mark. “Wheels of economic development grind slowly for Natives in Federal New Markets Tax Credit Program.” Tribal Business News Home, 2021.

<https://tribalbusinessnews.com/sections/finance/13630-wheels-of-economic-development-grind-slowly-for-natives-in-federal-new-markets-tax-credit-program>.

This article on the NMTC program and its relationship with Native communities provides a good overview of the obstacles Native organizations face in applying for and being awarded NMTC allocations. The article seeks to understand why rural and tribal communities are at a disadvantage in the LIHTC and NMTC allocation process and provides suggestions for addressing disparities. This resource looks at comments from the Native CDFI network and LIHTC and NMTC allocation histories, and suggests potential improvements to programs to make the process more equitable in Native communities.

Fredericks, Carla F. and Kate R. Finn. “Harnessing Private Equity for Indigenous Peoples.” Boulder, CO: First Peoples Worldwide University of Colorado, Boulder, 2020.

https://www.colorado.edu/program/fpw/sites/default/files/attached-files/harnessing_private_equity_for_indigenous_peoples_-_final.pdf.

This report, conducted at the University of Colorado Boulder through First Peoples Worldwide, seeks to understand how to better facilitate larger scale financing in Native Country, with a specific emphasis on tribal sovereignty and social prosperity through advancing private equity. This report contains three major components: the overall interest and need for large-scale economic development in Native Country, the necessary “core values” that center indigenous perspectives and prosperity, and how private equity plans, according to the authors, must align with said core values. This resource provides

historical and contemporary context to economic development in Indian Country, methods to harness private equity for Native people, and recurring themes and initiatives to ensure a sustainable and non-extractive deployment of services and facilities.

Graham, Lorie M. “An Interdisciplinary Approach to American Indian Economic Development.” *North Dakota Law Review*: Vol. 80: No. 4, Article 2, 2004.
<https://commons.und.edu/ndlr/vol80/iss4/2>.

This journal article looks at the reasons for variation in levels and rates of economic growth for Native American tribes. It explores various dimensions affecting tribal economic growth, such as politics, socioeconomics, and cultural norms, as well as the legal dimensions that influence tribal developments. Published in 2004, this journal article remains valuable because it provides a legal background of how development has occurred in tribal areas through various lenses, such as sovereign immunity, land ownership and control of property, and taxation and regulation.

Gregg, Matthew, Michou Kokodoko, & Elijah Moreno. “Take-up of New Markets Tax Credit Increases in Indian Country, With Potential for Far More.” Federal Reserve Bank of Minneapolis, 2022. <https://www.minneapolisfed.org/article/2022/take-up-of-new-markets-tax-credit-program-increases-in-indian-country-with-potential-for-far-more>. This article analyzes the extent to which NMTC investments have been used to create new capital for tribal governments, tribal enterprises, nonprofit tribal consortia, and Alaska Native Corporations. This source identifies 30 NMTC investments between 2001 and 2019 which are affiliated with a tribal business or government, an Alaska Native Village government, or a Native nonprofit organization, in addition to 24 other projects that occurred on tribal lands and involved tribal entities. This resource provides further evidence for the disparities in awards provided to tribal areas, but highlights that investments for NMTC Native Areas are slowly rising. It also outlines the current state of NMTC lending in Indian Country.

Gregg, Matthew, Ryan Nunn, and Casey Lozar. “An Urgent Priority: Accurate and Timely Indian Country Data.” The Federal Reserve Bank of Minneapolis, 2022.
<https://www.minneapolisfed.org/article/2022/an-urgent-priority-accurate-and-timely-indian-country-data>.

This article outlines current challenges in data collection and research in Indian Country. It highlights gaps that exist in the way public data is or is not collected in Indian Country, and reaffirms that government, individual, and business-level data is often scarce for Indian Country. It also discusses how the unique characteristics of Indian Country provide opportunities for data collaborations. It posits that more complete data on Native communities will help create opportunities for better decision-making.

Hillabrant, Walter, Judy Earp, Mack Rhoades, and Nancy Pindus. "Overcoming Challenges to Business and Economic Development in Indian Country." Princeton, NJ: Mathematica Policy Research, Inc. 2004. <http://webarchive.urban.org/publications/411104.html>. This report was prepared for tribal, state, and federal officials and other stakeholders in welfare reform in Indian Country. It was one of four reports on the evaluation of tribal Welfare to Work programs as mandated by the Balanced Budget Act of 1997. The evaluation describes (1) examples of business and economic development activities and the federal programs and initiatives used by a convenience sample of eight tribes and two Alaska Native corporations; (2) the legal, historical, and cultural context of tribal business and economic development; and (3) the challenges tribes/Native corporations face in pursuing business and economic development, as well as the promising approaches they are developing to minimize or overcome them.

Horn-Miller, Kahente. "What Does Indigenous Participatory Democracy Look Like? Kahnawà:ke's Community Decision Making Process." *Review of Constitutional Studies* 18, no. 1 (2013). https://papers.ssrn.com/sol3/papers2.cfm?abstract_id=2437675. With the 1979 Community Mandate to move towards traditional government, the community of Kahnawà:ke, part of the Mohawk Territory in Quebec, has consistently requested more involvement in decision-making on issues that affect the community. The Kahnawà:ke Community Decision Making Process is a response to the community's call for a more culturally relevant and inclusive decision and law-making process. The process is a transitory measure to assist and facilitate the legislative function of Kahnawà:ke governance. This paper examines the development of the process and how it functions in the modern Kahnawà:ke community as an example of indigenous participatory democracy in action.

Jorgensen, Miriam, and Stephanie Gutierrez. "Native Nation Building: It Helps Rural America Thrive." Aspeninstitute.org, 2021. <https://www.aspeninstitute.org/wp-content/uploads/2021/11/TR-FP-2-Native-Nation-Building-FINAL1.pdf>. This report provides historical background and context with a focus on Native populations in rural areas, and provides characteristics of successful Native nation building. It highlights strategies for equitable rural development with a Native perspective, including emphasizing that efforts for Native nation building must stem from Native nations' own self-determination efforts, and that building Native nations can spread wealth through other non-Native communities that live nearby.

Jorgensen, Miriam and Randall K.Q. Akee. "Access to Capital and Credit in Native Communities: A Data Review." Tucson, AZ: Native Nations Institute and the Arizona Board of Regents, 2017.

https://nnigovernance.arizona.edu/sites/nnigovernance.arizona.edu/files/2022-09/Accessing_Capital_and_Credit_in_Native_Communities__A_Data_Review.pdf. This document is the second part of a two-part series and a follow-up to the 2001 Native American Lending Study. It uses a range of datasets to document the evolution of Native communities' capital access since 2001. Its three main sections summarize data describing access to capital and credit for Native consumers, Native business owners, and tribal communities and governments.

Kokodoko, Michou, Valentina Dimitrova-Grajzl, Peter Grajzl, and Joseph Guse. "Native CDFIs Improve Credit Outcomes for Indian Country Residents." Federal Reserve Bank of Minneapolis, 2021. <https://www.minneapolisfed.org/article/2021/native-cdfis-improve-credit-outcomes-for-indian-country-residents>.

This article published by the Federal Reserve Bank of Minneapolis describes the ways in which Native CDFIs specifically help improve access to financing in Indian Country, and explores whether it is more difficult to get mortgage financing for Native Americans. The authors find that mortgage loans with Native Americans as the primary borrower are more likely to be higher-priced than loans that have other races or ethnicities as the primary borrower. In addition, the loans have an average interest rate nearly two percentage points above the average loan for non-Native Americans. This demonstrates that for Native borrowers, obtaining financing has historically been less accessible than for other Americans.

Kokodoko, Michael. "Findings from the 2017 Native CDFI Survey: Industry Opportunities and Limitations." Center for Indian Country Development, Federal Reserve Bank of Minneapolis, November 2017. Accessed December 16, 2022.

<https://www.minneapolisfed.org/~media/files/community/indiancountry/resources-education/working-papers/cicd-wp-2017-04.pdf>.

This article provides insight into how Native CDFIs operate and provides financial institutions with more information regarding Native CDFI-based investment opportunities. By surveying 39 certified Native CDFIs across the United States about their funding options and programs, this research noted that Native CDFIs are ready to deploy more funding in an effective manner, despite the variety of challenges that prevent economic development in their communities from taking place. In addition, this resource indicates the capacity of Native CDFIs and their current limitations, as well as providing the recommendation to increase Native capacity for NMTC use.

Kokodoko, Michou. "Making the New Markets Tax Credit work in Native communities." Federal Reserve Bank of Minneapolis, 2017.

<https://www.minneapolisfed.org/article/2011/making-the-new-markets-tax-credit-work-in-native-communities>.

This article seeks to understand the unique challenges Native communities face in accessing NMTCs, and how Native CDFIS and CDEs have used NMTCs successfully. Successful examples illustrate a strong relationship between the financial institution and the tribes. Some challenges are also noted in this document, including: the inability to use NMTCs on gambling facilities; many corporations that are owned by tribes are ineligible to be QALICBs; and the complicated structures regarding land ownership. The discussion regarding successful examples may be useful for pinpointing common themes that can benefit future projects.

Kramer, Rachel, Harry Maher, Kevin Klingbeil, Nancy Pindus, Megan Knox, and Lonny Macy. “Assessment of the Housing Needs of American Indians, Alaska Natives and Native Hawaiians in Washington State.” Big Water Consulting for Washington State Department of Commerce, 2021. https://www.commerce.wa.gov/wp-content/uploads/2022/04/CommerceReports_2021_CSHD_NA-Housing_4.26.22_Final.pdf.

This report was conducted on behalf of the Washington State Department of Commerce, and looks at the current housing conditions for American Indians, Alaska Natives, and Native Hawaiians in the state of Washington, as well as what programs can help address needs for housing. This report looks at American Housing Survey (AHS) and University of Washington Real Estate data through literature and data reviews, in addition to interviews, surveys, and focus groups with tribal leaders. The study found that inflationary erosion hurts IHBG funding, the main source of funding for most TDHEs; LIHTC projects often do not pencil out for small TDHEs (which is likely also the case for NMTCs); housing and economic development are intertwined; many of the tribes with strong funding for housing beyond IHBG also have casino revenue; and high turnover among professional housing staff makes work difficult.

Kurlander, Phyllis. “Creating an Environment to Attract Investors and Develop New Enterprises on the Fort Mojave Indian Reservation.” John F. Kennedy School of Government, Harvard University. Malcolm Wiener Center for Social Policy, 1994. <https://hwpi.harvard.edu/files/hpaied/files/prs94-4.pdf?m=1639579236>.

This report, published in 1994, identifies key components for successful private investment and business development on the Fort Mojave Indian Reservation, which includes an integrated approach to economic development to enable the tribe to move towards economic self-determination and a sustainable economy. Interviews were conducted with Native American economic development professionals, Fort Mojave tribal members, federal government officials and more, to determine the key recommendations for spurring economic development in Indian reservations. This

resource's recommendations are as follows: 1) incorporate tribal assets into business strategy; 2) boost tribal government through self-government efforts; 3) distinguish between business and government goals; and 4) establish a dependable contract enforcement and dispute resolution system. While this resource is dated, it provides context for considering how these recommendations can fit into current economic development efforts.

Lhamon, Catherine E., Patricia Timmons-Goodson, Debo P. Adebile, Gail L. Heriot, Peter N. Kirsanow, David Kladney, Karen Narasaki, and Michael Yaki. "Broken Promises: Continuing Federal Funding Shortfall for Native Americans." The United States Commission on Civil Rights, 2018. <https://www.usccr.gov/files/pubs/2018/12-20-Broken-Promises.pdf>.

This report highlights the difficult relationship between Native tribes and the federal government. It looks at the nature of relationships between tribes and the federal government since the year 2003 and concluded that the federal government has failed to assist tribes with individualized economic development necessary for tribes to exercise self-determination. The programs that are designed to support Native Americans remain chronically underfunded. In addition, data collected about Native Americans are often incomplete, inaccurate, old, or simply not tracked by the federal government. These factors and more have led many tribes to have a fraught relationship with the federal government, which can exacerbate the economic disparities in Indian Country.

Listokin, David, Kenneth Temkin, Nancy Pindus, and David Stanek. "Mortgage lending on tribal land: A Report from the Assessment of American Indian, Alaska Native, and Native Hawaiian Housing needs." U.S. Department of Housing and Urban Development, 2017. <https://www.huduser.gov/portal/publications/NAHSC-Lending.html>.

This report provides the perspective of outside lenders working in Indian Country in the context of mortgage lending. It describes the contemporary mortgage program availability and activity in Indian Country (focusing on Section 184) and examines how today's lenders view challenges to and best practices for mortgages in Indian Country; much of the report reflects the perspectives of the interviewed lenders. The analysis also examines the Section 184 Program's effect on lending activity during the 2008 financial crisis.

Lofthouse, Jordan K. "Institutions and Economic Development on Native American Lands." *The Independent Review* 24, no. 2 (Fall 2019): 227-248. https://www.independent.org/pdf/tir/tir_24_2_04_lofthouse.pdf.

This paper brings market-process theory and entrepreneurship into the broader discussion of the institutional effects on Native American economic development. The author states

that this is important because it gives greater insight into the intimate connections between institutions, entrepreneurship, and economic growth. The author concludes that Native Americans live under fundamentally different institutions than other Americans and notes that the complex property rights regime of the federal land trust stifles mutually beneficial exchange, hampers the market processes, and allows government officials to intervene heavily into economic affairs. Also, the author notes that the dual bureaucracy of federal and tribal officials increases transaction costs because of the broad authority and discretion that these officials have to make public policy. Under those unique institutions, the federal government has created an environment of uncertainty and high costs that pose significant constraints for entrepreneurial action, thus limiting economic development at large.

MacDonald, Peter, Kenneth Smith, Philip Martin, Lorraine Ruffing, Leo Denetsone, Bill Douglass, Frank Ryan, Ron Trosper, Pat Porter, and A.T. Anderson. "Report on Reservation and Resource Development and Protection." Final Report of the Indian Policy Review Commission, 1976.

<https://babel.hathitrust.org/cgi/pt?id=nyp.33433048657716&view=1up&seq=17&skin=2021>.

This 1976 report was conducted by the Indian Policy Review Commission provides foundational information regarding economic development in Indian Country. It looks at how the federal government has historically interacted with tribes, addresses how economic development looks for different Indian tribes, and considers what a successful relationship between tribes and the federal government would look like. Surveys and interviews of different tribes and tribal members are used to compare and contrast the meanings and interpretations of economic development. The authors conclude that total Indian economic development cannot be reached if the federal government does not provide American Indian governments' control of their own affairs.

Miller, Robert JR. *Reservation Capitalism: Economic Development in Indian Country*. Lincoln NE: U of Nebraska Press, 2013.

This book describes economic disparities of Native Americans and their history, but provides a hopeful perspective that economic development will lead to improved conditions and sustainable economies. The author also provides background information on Indigenous economic systems and property rights and explains how the vast majority of Native lands and natural resource assets were lost. Historically, most tribal communities were prosperous, composed of healthy, vibrant societies sustained over hundreds and in some instances perhaps even thousands of years. Miller focuses on strategies for establishing public and private economic activities on reservations and for

creating economies in which reservation inhabitants can be employed, live, and have access to the necessities of life, circumstances ultimately promoting complete tribal self-sufficiency.

Native Nations Institute. “Access to Capital and Credit in Native Communities.” 2016. http://nni.arizona.edu/application/files/8214/6378/9056/Access_to_Capital_and_Credit_in_Native_Communities.pdf.

This report, which was commissioned by the CDFI Fund, seeks to understand the challenges Native communities face in accessing credit and capital. It uses public comments, consultations, focus groups, literature reviews, and interviews with key informants to pinpoint challenges that Native communities face in accessing the means for financial wellness and development.

Oweesta Corporation. Snapshot 2018 The Growing Native CDFI Movement, 2018. https://www.oweesta.org/wp-content/uploads/2018/11/Snapshot-2018-Growing-NCDFI-Movement_web.pdf.

This report describes the Native CDFI industry in 2018, focusing on capital needs, contextualizing these needs within the history of the Native CDFI movement. The authors used surveys, interviews, and public sharing of data internal to Oweesta, and concluded that the Native CDFI wrap-around service model is successful, with growing financial and operational sustainability. This report also documents Native CDFIs’ increasing needs for lending and operational capital and discusses the current obstacles restricting this capital flow. Finally, this report makes recommendations for Native CDFIs and future partners for confronting these challenges and better supporting this impactful movement.

Palmer, Vanessa, Ryan Nunn, & Casey Lozar. “Native American Labor Market Dashboard Fills Important Data Gap for Indian Country.” Federal Reserve Bank of Minneapolis, 2021. <https://www.minneapolisfed.org/article/2021/native-american-labor-market-dashboard-fills-important-data-gap-for-indian-country>

This study introduces tools and tracks unemployment among the American Indian and Alaska Native (AIAN) population, a measure which is not sufficiently tracked by the Census or Bureau of Labor Statistics measurements. This report acknowledged that unemployment, which is reported by the Census Bureau, often looks different from unemployment in AIAN communities, and that federal statistical agencies do not report data specific to the AIAN population due to it being a relatively small sample size. This resource can be helpful to offer relevant insights on the monitoring of AIAN-specific data.

- PD&R Edge. “Innovative Funding Provides Culturally Specific Affordable Housing to Native Americans.” U.S. Department of Housing and Urban Development, 2021.
<https://www.huduser.gov/portal/pdredge/pdr-edge-inpractice-072621.html>.
This case study highlights examples of using multiple funding streams to support an affordable housing project, including the Indian Housing Block Grant Program. While this case study provides an example of a project done in an urban area outside of tribal lands, it provides a perspective of how projects can be developed with cultural identity in mind, as well as a successful example of creatively leveraging multiple funding streams.
- Pettit, Kathy, G. Thomas Kingsley, Jennifer Biess, Kassie Bertumen, Nancy Pindus, Chris Narducci, & Amos Budde. “Continuity and Change: Demographic, Socioeconomic, and Housing Conditions of American Indians and Alaska Natives.” U.S. Department of Housing and Urban Development Office of Policy Development and Research, 2014.
https://www.huduser.gov/portal/publications/commdevl/housing_conditions.html.
This resource looks at the economic diversity that exists across different tribal areas and provides examples of economic development and Native CDFI successes. The findings illustrate that real per capita income in Indian Country grew 2-3x the rate of the general U.S. population from 1990 to 2000. Economic development has been uneven across Indian Country.
- Pindus, Nancy, G. Thomas Kingsley, Jennifer Biess, Diane Levy, Jasmine Simington, & Christopher Hayes. “Housing Needs of American Indians and Alaska Natives in Tribal Areas: A Report From the Assessment of American Indian, Alaska Native, and Native Hawaiian Housing Needs.” U.S. Department of Housing and Urban Development Office of Policy Development and Research, 2017.
<https://www.huduser.gov/portal/sites/default/files/pdf/HNAIHousingNeeds.pdf>.
This report provides information regarding the demographic, social, and economic conditions of American Indians and Alaska Natives (AIAN) in tribal and non-tribal areas through a housing lens. It determines housing conditions and housing shortage via nationally representative survey of housing conditions and needs among AIAN households in tribal areas, a survey of 110 Tribally Designated Housing Entities (TDHEs), and 22 site visits. This report illustrates a significant need for housing in AIAN areas.
- Pindus, Nancy, and Kevin Klingbeil. “Tribes are Using Creative Place-Based Solutions to Increase Homeownership Options.” *Housing Matters*, Urban Institute, 2019.
<https://housingmatters.urban.org/articles/tribes-are-using-creative-place-based-solutions-increase-homeownership-options>.

This online blog post explains the importance of Native CDFIs and their essential role in providing financing in Indian Country. It explains the unique challenges of mortgage lending and homeownership in Indian Country and provides an overview of several studies. It notes that Native CDFIs are essential for bridging the gap between traditional financial institutions and Native communities.

Scott, Andrew P. “An Overview of Rural Credit Markets.” Washington, DC: Congressional Research Service, September 2021.

<https://crsreports.congress.gov/product/pdf/R/R46914>.

A significant portion of the U.S. population lives in rural areas, where access to financial services—specifically credit products—varies compared to access in urban areas. One reason for this variation is that the demographics and economic realities of rural areas differ from those of urban areas in several ways. For example, rural populations are more likely to be older and have lower incomes relative to urban populations, and local rural economies tend to be less diversified in terms of number and types of industries present, making them more susceptible to economic shocks. Credit access is broadly underdeveloped in Native American communities, which constrains economic development. The federal government supports economic development in tribal nations through various development, community development, and housing programs. This report describes Rural Consumer Financial Services, including for housing, manufactured housing, retail banking, and alternative credit as well as agricultural and commercial financial services. The report includes sections on credit in Native American communities and federal programs to promote Native credit access.

Trahan, Mark. “At The Crossroads: State of the Economy in Indian Country.” *Indian Country Today*, 2022. <https://indiancountrytoday.com/news/at-the-crossroads-state-of-the-economy-in-indian-country>.

This is a series of 10 articles from the Institute for Nonprofit News, Indian Country Today and nine other news partners. The series highlights the current state of the economy in Indian Country. It used a nationwide survey that was administered by Indian Country Today and various partners, and found a lack of data surrounding the economic size of Indian Country. In addition, it found that many tribes are the largest employers in their rural areas, and described the potential of certain sectors to boost economic growth, such as health care and green energy like solar and wind.

U.S. Government Accountability Office. “Tribal Economic Development: Action is Needed to Better Understand the Extent of Federal Support: Report to Congressional Committees.”

GAO-22-105215. Washington, DC: U.S. 2022. <https://www.gao.gov/products/gao-22-105215>.

GAO conducted this study in accordance with a provision of the Indian Community Economic Development Act of 2020. This report examines economic development programs available to tribal entities and the extent of fragmentation, overlap, and duplication among these programs; analyzes available data on obligations to tribal entities for these programs; and describes selected tax incentives available to tribes. GAO reviewed program information, analyzed obligations data, and interviewed tribal entities, agency officials, and Native Community Development Financial Institutions. GAO reported that programs are fragmented across seven agencies: the U.S. Departments of Agriculture (USDA), Commerce, Energy, Health and Human Services, Housing and Urban Development, and the Interior, and the Small Business Administration (SBA). Tribal organizations GAO spoke with said many tribes have limited capacity to identify and access programs and may not be aware of the federal assistance available. Some programs that serve a wider range of eligible recipients do not identify the amount that went to tribal entities. Using location data for the New Markets Tax Credit, GAO estimated that from 2004 through 2019, tribal communities (defined as individuals and businesses on or near reservations, trust land, or Oklahoma Tribal and Alaska Native Village Statistical Areas) received between \$734 million and \$891 million of investment (1.3 to 1.6% of the total dollars invested via the credit). GAO recommended that Commerce maintain information on economic development programs available to tribal entities across the federal government and that SBA and USDA establish plans to periodically analyze and report the amount of economic development assistance provided to tribal entities.

Winchell, Dick G. “Indigenous Rural Renewal in the Inland Pacific Northwest: The Emergence of American Indian Tribes in Regional Economic Development.” *Journal of Rural and Community Development* 8, no. 3 (2013): 174-197.

<https://journals.brandonu.ca/jrcd/article/view/1036/253>.

This journal article explores policies that have historically harmed or helped economic growth in Indian Country using various data sources. Findings illustrate that tribal communities don’t score well in terms of impact per dollar invested because they are less condensed than non-tribal rural areas. The author also highlights that there is a historical lack of successful NMTC applications for Native CDFIs, which discourages many tribal projects from expending money and time to apply. The author highlights the need for Native set-asides for NMTC allocations, which already exists for LIHTC.