



Organization Background

The Oklahoma Native Assets Coalition (ONAC) is a national Native-led nonprofit that works with tribes and partners interested in establishing asset-building initiatives and programs in Native communities, for the purpose of creating greater opportunities for economic self-sufficiency of tribal citizens. Started in 2001, ONAC is an intermediary funder, grassroots network coordinator, and also a direct service provider that works with Native families to build their assets through ONAC's provision of Native-specific financial education and financial coaching, as well as funding of Children's Savings Accounts (CSAs), emergency savings accounts (ESAs), down payment assistance, incentivized Bank On accounts, and emergency cash assistance. ONAC will soon launch a revolving loan fund.

The mission of the Oklahoma Native Assets Coalition (ONAC) is to build and support a network of Native people who are dedicated to increasing self-sufficiency and prosperity in their communities through the establishment of integrated culturally-relevant financial education and financial coaching initiatives, as well as seed-funded account programs, down payment assistance, free tax preparation, expanded banking access, and other asset-building strategies.

ONAC, while keeping its name, works with tribal citizens across the country regardless of where they reside. For the past several years, ONAC has administered a down payment assistance program. To date, ONAC has provided down payment assistance to 90 participants. ONAC's DPA program is fair housing compliant. It happens that the majority of the participants are American Indian from various Native Nations.

Need for All American Indian and Alaska Native Citizens to Have Access to Affordable Housing Regardless of Geography

It is ONAC's understanding that Duty to Serve does not currently address/cover American Indians and Alaska Natives (AIAN) unless they reside in rural areas. It is important to note that AIAN reside in rural and urban areas across the country. There is documentation of undercounting of AIAN in urban and rural areas in the 2020 Census (<https://ncuih.org/2023/08/28/urban-american-indian-undercount-in-the-2020-census-went-underreported/>). There has been a long history of AIAN undercounting as well as a more invisible urban Native population. At least 70% of AIAN reside in urban areas. This is a conservative and undercounted estimate of the urban Indian population.¹ Fannie Mae and Freddie Mac should create or expand their Native loan products and other resources to serve AIAN regardless of where they purchase a home in the U.S. through their Equitable Housing Finance (EHF) plans which do not have the same restrictions about serving non-rural Native peoples. This country has a duty to reach all of these unserved and underserved tribal citizens and they should all be covered in these EHF plans.

According to the U.S. Department of Health and Human Services Office of Minority Health, "The 2020 Census reveals that [87 percent](#) of those who identify as AI/AN alone or in combination population live outside of tribal statistical areas, 13 percent live on reservations or other trust lands." Here is a link to the most recent Census map,

https://www2.census.gov/geo/maps/DC2020/AIANWall2020/2020_AIAN_US.pdf, see the box to the

¹ See 70% urban Indian reference by HHS (<https://minorityhealth.hhs.gov/american-indianalaska-native-health>) and the National Urban Indian Family Coalition (<https://www.nuifc.org>).



right noting percent distribution of AIAN populations, last graphic. This map has not yet been updated by the Census Bureau to account for the McGirt v. Oklahoma Supreme Court ruling that the Muscogee Nation reservation was never disestablished. There has been no adjustment by Census to now count the large Native population in Tulsa as living on reservation lands. Following the McGirt ruling, the Oklahoma Court of Criminal Appeals applied that ruling and determined that nine other tribes had not been disestablished. This means that the eastern half of Oklahoma (including the City of Tulsa) are reservation lands and that post-McGirt, we have urban areas that are reservation lands in this country. There are also tribes that have trust lands in cities. We prefer resources for AIAN citizens regardless of where they reside and need DPA or financing.

In terms of housing, the urban and rural Indians ONAC serves are all very underserved and high-need populations and we are trying to provide programming that is serving AIAN nationally, regardless of where they reside. Due to increased cost of living, higher interest rates, reduced housing stock, etc., it is a challenge to assist lower-income families as they seek affordable housing. ONAC's DPA funding is available whether the tribal citizens are purchasing in urban areas, on trust lands, etc. Thus far, 28% of our DPA funding has been paid to those in urban areas (here defined as populations over 50,000). The other 72% has served those purchasing homes in rural areas. ONAC needs flexible DPA funding to serve all AIAN.

ONAC is tasked with serving tribal citizens across the country. We are one of the only Native organizations directly providing national down payment assistance. As a Native nonprofit, we have to figure out how to provide DPA to tribal citizens regardless of where they intend to purchase a home (in a city, in the suburbs, on a reservation such as in the City of Tulsa, on tribal trust lands, in rural areas that are not on a reservation, etc.). Post McGirt, we must acknowledge that, proportionate to the size of the city, Tulsa still has the highest concentration of tribal citizens residing in a city in the United States and is a reservation in a large urban area. We must also acknowledge that there are tribes putting land into trust that is not only in rural areas. Entities like ONAC need the flexibility and full access to the Enterprise resources to allow us to serve all Native homebuyers.

In late 2023, ONAC published a paper based on our research from providing down payment assistance. This paper could be used to inform revisions to the EHFPs. Here is a link to the paper: <https://bit.ly/DPAONAC1>.

ONAC supports the following suggestions for equitable housing finance plans:

1). Work with all in the Native Housing Ecosystem:

The GSEs should establish AIAN programs more holistically for Native American citizens of federally-recognized tribes regardless of geographic location. The FHFA and the GSEs should work with all of those in the Native housing and Native asset-building ecosystem. This means working with and providing funding for Native-led nonprofits, such as ONAC, that are not CDFIs and that provide DPA, financial coaching, Volunteer Income Tax Assistance (VITA) support, homebuyer education, emergency savings accounts, banking access incentives, etc. Also, there should be efforts to work with the Native-owned banks that are providing a number of mortgages in Native communities, as well as the other lenders providing mortgage loans to tribal citizens (large national mortgage companies, community banks, credit unions, large national banks, and Native CDFIs). In our opinion, if the goal is increased Native



homeownership, we need to support all those lending to tribal citizens, including the ones not often included at the table. Also, it is important to include the Tribally Designated Entities (TDHEs), tribal colleges and universities, Native VITA programs, and various tribal government programs.

2). Location-neutral AIAN programs:

ONAC would like for the Enterprises to fund all those in the Native housing ecosystem. In our opinion, funding should not be restricted to tribal governments who have Native nonprofits connected to them. It also needs to be available to the Native nonprofits that are serving pan-Indian, across the country, and that are not affiliated with just one Native Nation. We agree that it should be up to the Native entity to determine what is their service area and how they are going to serve tribal citizens.

3). Down Payment Assistance Grant Support: Fannie Mae and Freddie Mac could pilot a grant funding program that is open to Native-led nonprofits, TDHEs, tribal governments, Native CDFIs, and tribally-owned financial institutions in support of down payment assistance (DPA) programs. Our preference is to keep this wording as is as ONAC would like the Enterprises to fund DPA for all those in the Native housing ecosystem. In our opinion, funding should not be restricted only to tribal governments who have Native nonprofits connected to them. It also needs to be available to the Native nonprofits that are serving pan-Indian, across the country, and that are not affiliated with just one Native Nation. We agree that it should be up to the Native entity to determine what is their service area and how they are going to serve tribal citizens.

ONAC suggests that Fannie Mae and Freddie Mac could pilot a grant funding program for Native-led nonprofits that are not CDFIs, TDHEs, tribal governments, and Native CDFIs in support of down payment assistance (DPA) programs. Grant awards of up to \$750,000, per grantee, over three years (to provide \$5,000 in DPA to each of 125 homebuyers with \$125,000 in funding for program administration). The DPA may be used for tribal citizens of federally-recognized tribes residing up to 120% AMI regardless of where they are purchasing a home in the United States (urban and rural). The DPA may be stacked with other DPA and may be used with any mortgage product, by any lender, for existing and new construction (the latter to address housing shortages in Native communities). The income will only be counted for the homebuyers listed on the mortgage (and not their children or other family members residing with them given intergenerational Native families).

4). Capital Pool that Allows for Deep Subsidies: Fannie Mae and Freddie Mac should work with Native CDFIs, tribally-owned financial institutions, and other eligible Native-led nonprofits, such as ONAC, to facilitate asset development, home improvements, and other hard housing costs for tribal citizens of federally-recognized tribes by supporting the creation of loan capital pools that allow for deep subsidies. Our preference is to keep this wording and not to reword to have the funding go to tribes to then trickle down to their nonprofits, etc. Entities like ONAC, who are doing this work in the field, also need access to Enterprise funds for asset development/capacity building programming and for revolving loan funds for housing.

5). Improved Financing Tools for New Infrastructure: Fannie Mae and Freddie Mac can create more diverse grants, loans, and other financing opportunities that allow for Native-led nonprofits such as ONAC, TDHEs, tribal governments, tribally-owned financial institutions, and Native CDFIs to subsidize housing costs for individual households by undertaking the costs of relevant infrastructure development.



These tools could be used in urban, rural, and tribal statistical areas, and participating organizations will be allowed to define terms of program including eligible infrastructure, radius from construction sites, and total number of households served through investment. This solution will also lead to an increase in housing stock by enhancing affordability for both development agencies and households. ONAC prefers to keep the wording as included above so that all those in the Native housing ecosystem who are doing this work on the ground have equal access to funding. We do not prefer for the funding to go only to tribal governments, including their related Native CDFIs, eligible nonprofits and TDHEs, as if we are understanding this suggestion correctly, this would leave out the Native nonprofits that are not affiliated with a Native Nation but serve tribal citizens from all Nations.

In Closing: Until Duty to Serve is revised to include high-needs Native peoples in rural and urban areas, ONAC advocates that the Fannie Mae and Freddie Mac Equitable Housing Finance Plans include resources that also serve non-rural AIAN. It is incumbent upon FHFA to serve all Native people and to help those of us on the ground to be able to do so.

Contact: For further information, contact the ONAC Executive Director, Christy Finsel, Ph.D., (Osage Nation), at cfinsel@oknativeassets.org or (405) 720-0770.

www.oknativeassets.org