



# Redlining the Reservation: The Brutal Cost of Financial Services Inaccessibility in Native Communities

Dave Castillo - CEO Native Community Capital  
and  
NCRC Research



## David Castillo

Mr. Castillo serves as CEO of Native Community Capital a Native Community Development Financial Institution (CDFI). NCC maintains offices in New Mexico and Arizona.

# NCRC Research Department

Jason Richardson  
Director  
*Geographer*



Bruce Mitchell PhD.  
Principal Researcher  
*Geographer*



Jad Edlebi  
GIS Data Engineer  
*Urban Planner*



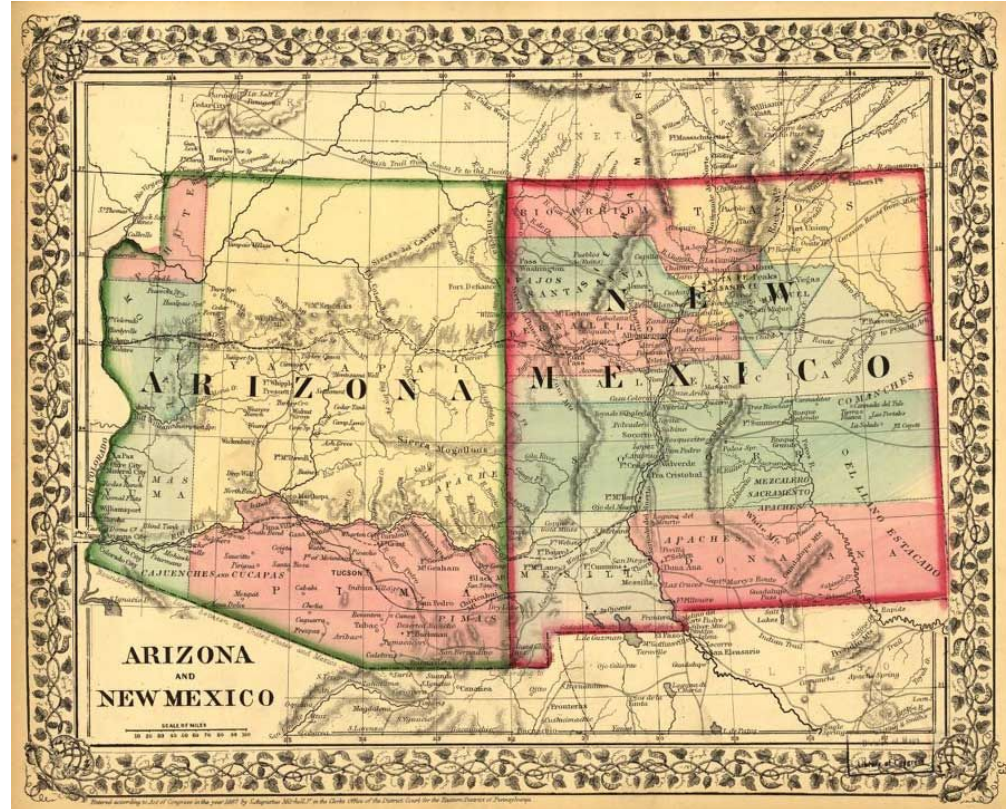
Joseph Dean  
Research Specialist  
*Economist*



# What do we mean by “Redlining the Reservation”?

**Native American tribal areas have a legacy of neglect and exploitation. Sometimes isolated, they have been largely ignored by the financial services industry.**

**They are vulnerable to predatory lending practices**



Augustus Mitchell map (1867) Library of Congress

# What do we mean by “brutal cost”?

## Homeownership gap -

10% in New Mexico, 16% in Arizona

## Inadequate Plumbing & Water -

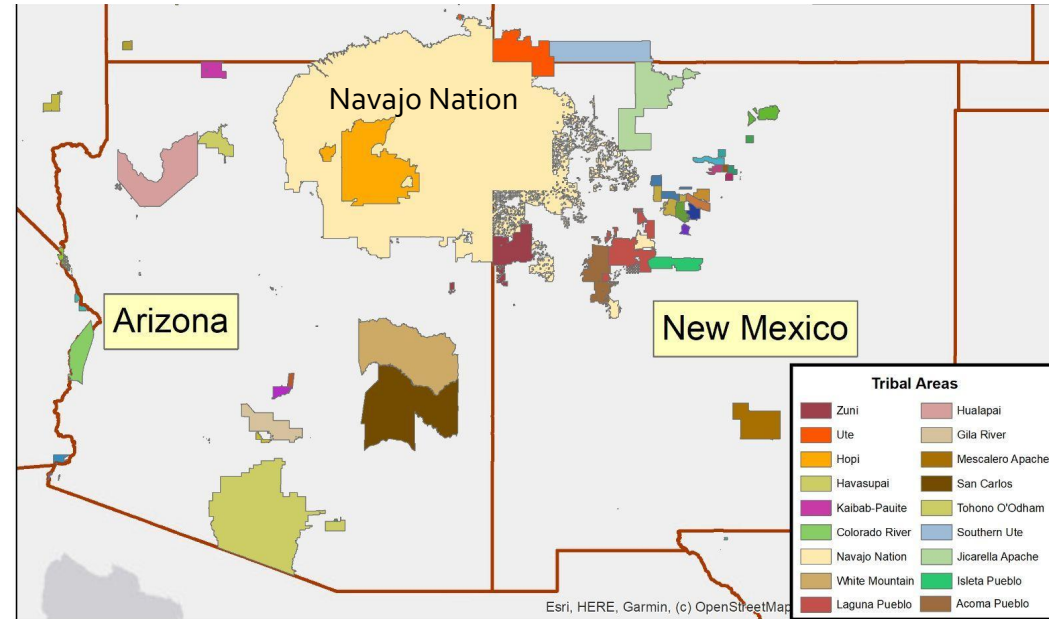
6% of Native American homes, 1% other Americans

## Inadequate Heating -

12% of Native American homes, 2% of other Americans

## Overcrowding -

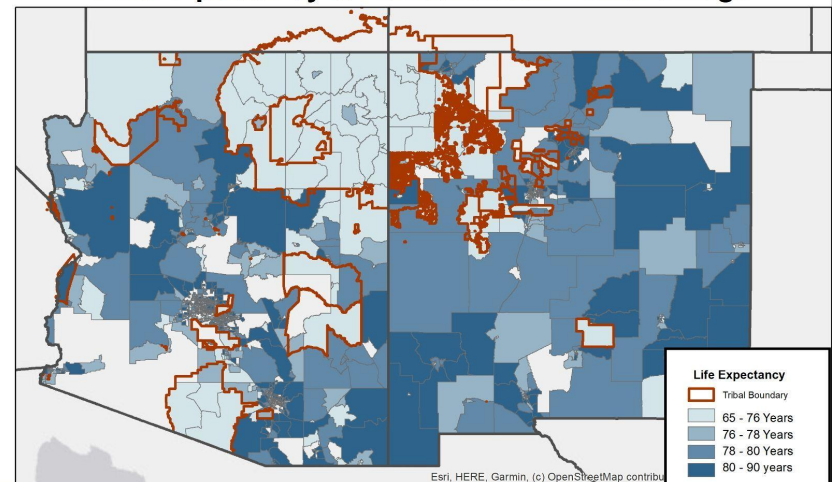
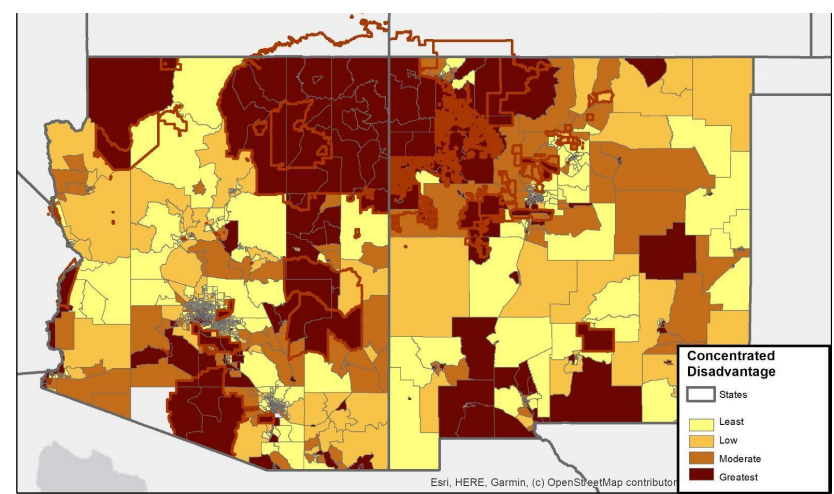
16% of Native American households, 2% for other American households



# What do we mean by “brutal cost”?

**Concentrated Disadvantage -**  
High poverty, unemployment and  
reliance on public assistance

**Life Expectancy -**  
71.8 Years in 2019, slipping to 67.9 years by  
2022, at least 7 years lower than for  
Non-Hispanic White Americans.



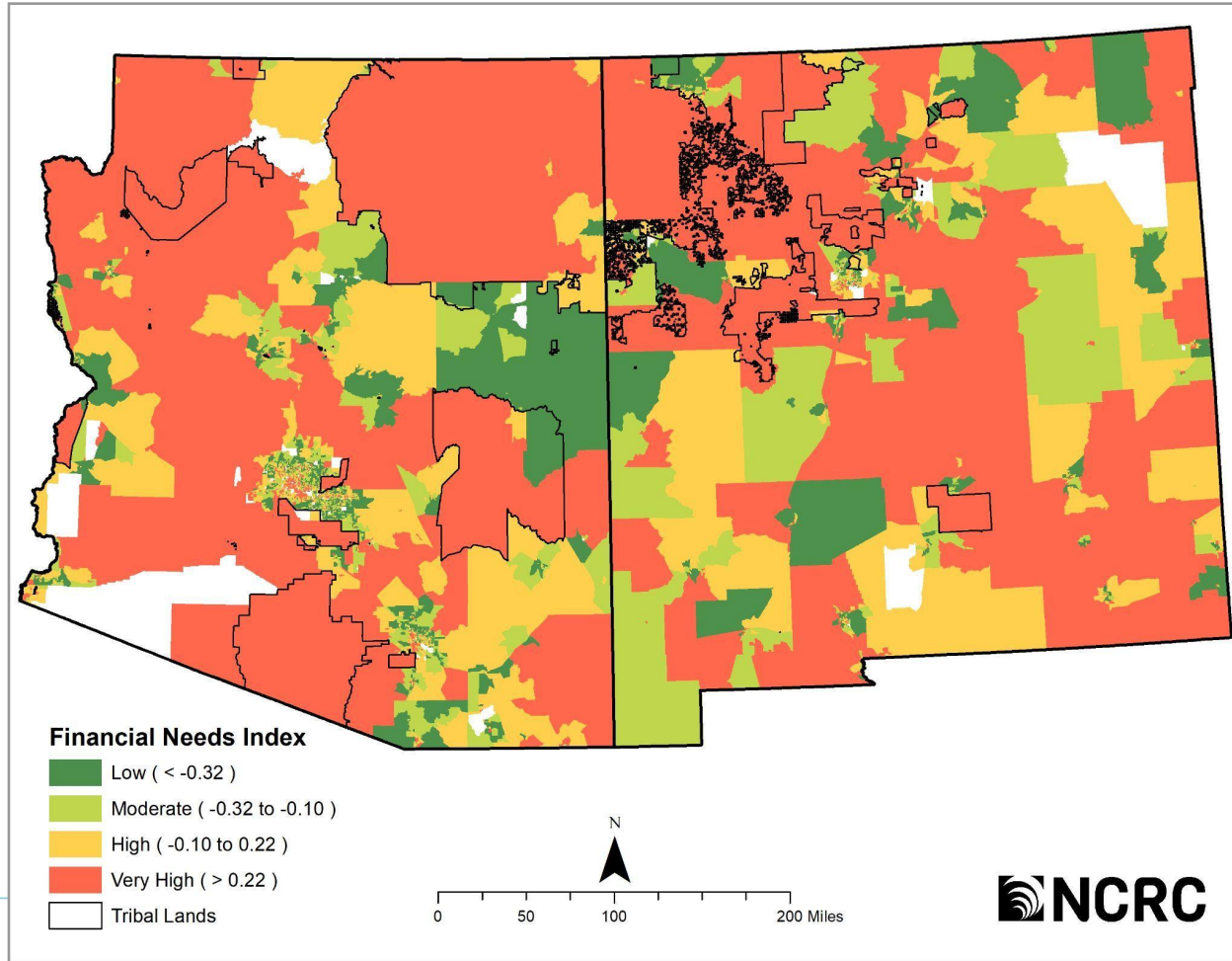
## Problems with Data on Native Americans

1. Flawed Census counts
2. Almost double the count - 2010 5.2 million, 2020 9.7 million
3. Poor data coverage of tribal areas - lacks full data on housing
4. Mismatch on mortgage and small business data



# Financial Needs Index

Measures population, transportation, cell phone and internet access, and distance to bank branches.





## Financial Access

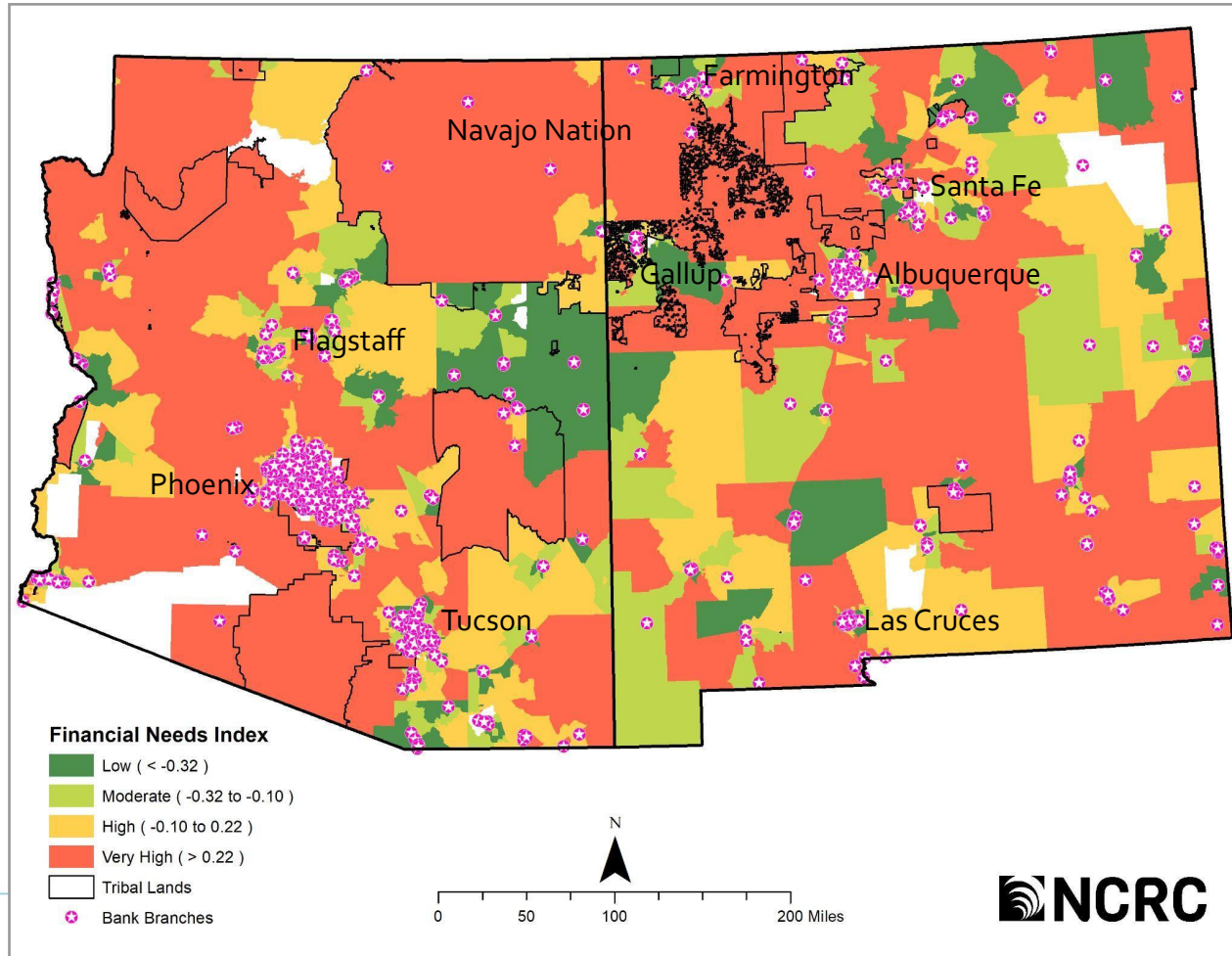
### Research Conducted:

Descriptive & Statistical Analysis

### Results:

Rural areas have poor financial access, but it is much worse in tribal areas.

**Navajo Nation** - 5 bank branches to serve 250,000 people, the size of West Virginia.



## Small Business Lending 2018-2021

### On tribal land on low and moderate income areas:

- Less than 1 cent for every dollar loaned in other low and moderate income areas
- Over 4 years an average of only 5 loans, compared to 82

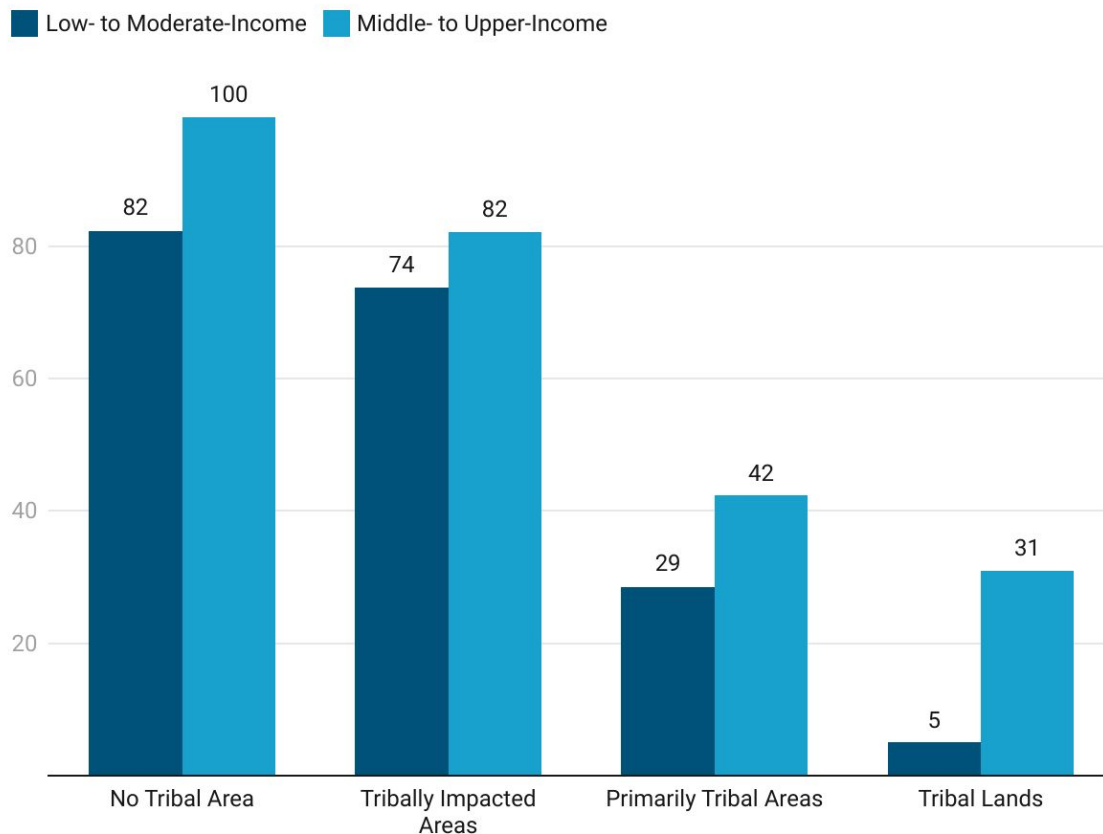


Chart: NCRC Research • Source: FFIEC CRA aggregate small business lending data Table A1-1 • Created with Datawrapper

# Pandemic Lending

2020-2022

In tribal and primarily tribal lands PPP lending supported:

-Casinos - 2,300 workers

-Restaurants - 2,500 workers

-Electrical Companies - 500 workers

-Hotels - 1,100 workers

Total - 6,400 workers

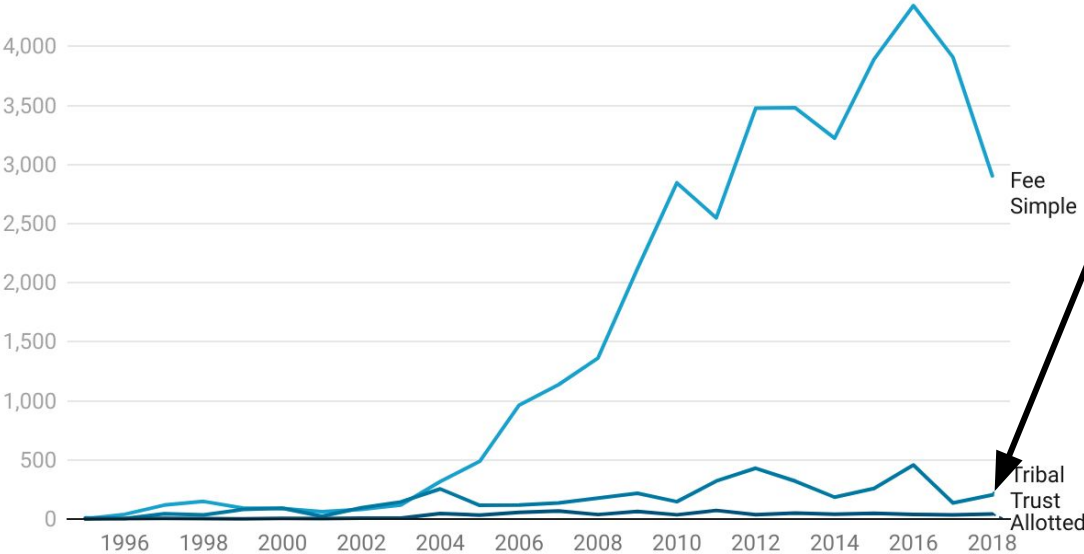
Area Type	Total Number	Total lending	Average Amount
No Tribal Area	10,034	\$921M	\$92K
Tribally Impacted Areas	905	\$77M	\$85K
Primarily Tribal Areas	474	\$55M	\$117K
Tribal Lands	614	\$128M	\$209K
Total	12,027	\$1B	\$98K

Created with Datawrapper

# Mortgage Lending

## HUD Section 184 Guaranteed Mortgages

HUD Section 184 mortgages by property land ownership category.



Only 204 loans nationally in 2018

Source: HUD Office of Loan Guarantee [https://www.datawrapper.de/\\_vDYxq/](https://www.datawrapper.de/_vDYxq/)

Source: HUD Office of Loan Guarantee • Created with Datawrapper

# Top Ten Metros and Mortgage Lending 2018-2021

The study area as a whole reported almost 2.6 million loan applications from 2018 to 2021.

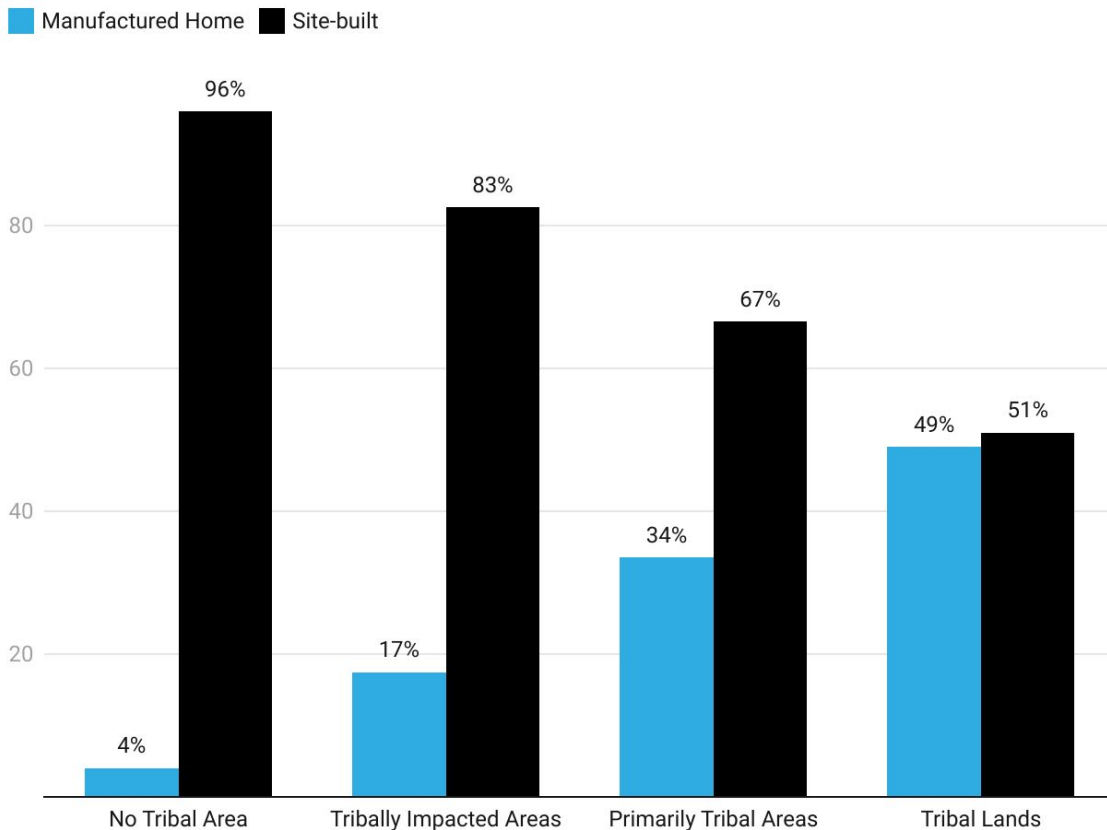
1.9% were from a Native American borrower or co-borrower.

Metro	Applications	Percent with A Native American Application or Co-Applicant	Number with A Native American Application or Co-Applicant
Grand Total	2,589,167	1.9%	47,790
Phoenix-Mesa-Chandler, AZ	1,704,496	1.3%	22,079
Albuquerque, NM	213,717	3.5%	7,446
Tucson, AZ	280,523	1.7%	4,723
Farmington, NM	15,179	18.5%	2,812
Gallup, NM	3,637	42.6%	1,550
Flagstaff, AZ	36,892	3.8%	1,396
Lake Havasu City-Kingman, AZ	71,314	1.8%	1,306
Prescott Valley-Prescott, AZ	85,662	1.3%	1,099
Rural Arizona	7,901	13.7%	1,080
Show Low, AZ	22,770	3.8%	859

# Manufactured Housing Home Purchase Loans 2018-2021

Manufactured homes are a critical part of housing on tribal lands.

This chart likely undercounts the number of manufactured home purchase loans, making them the primary construction type on tribal lands.



2018-2021 HMDA data. Owner occupied, 1-4 unit homes.

Chart: NCRC • Source: CFPB • Created with Datawrapper

# Manufactured Housing Home Purchase Loans 2018-2021

Rate spreads on tribal lands are much higher than off tribal lands and in comparison to non-Native borrowers.

	Site-built		Manufactured Home	
	Non-Native	Native American	Non-Native	Native American
No Tribal Area	48	62	149	352
Tribally Impacted Areas	42	43	144	420
Primarily Tribal Areas	50	79	164	458
Tribal Lands	64	51	339	549
All Areas	48	62	150	418

*Originations on owner occupied, 1-4 unit properties 2018-2021.*

Table: NCRC • Source: CFPB • Created with Datawrapper

# Manufactured Housing Home Purchase Loans 2018-2021

Rate spreads on tribal lands are much higher than off tribal lands and in comparison to non-Native borrowers.

	Site-built		Manufactured Home	
	Non-Native	Native American	Non-Native	Native American
No Tribal Area	48	62	149	352
Tribally Impacted Areas	42	43	144	420
Primarily Tribal Areas	50	79	164	458
Tribal Lands	64	51	339	549
All Areas	48	62	150	418

Originations on owner occupied, 1-4 unit properties 2018-2021.

Table: NCRC • Source: CFPB • Created with Datawrapper



- National average mortgage interest rate as of Feb 15th, 2024: **6.77%**.
- Off Tribal land non-Native buyers would pay **8.26%** interest rate.
- Native buyers on Tribal land: **12.26%** interest rate.
- Over twenty years on a \$100,000 loan this results in **\$63,978** in *additional* interest paid by the Native buyer on Tribal land.

# usury

[ yoo-zhuh-ree ]

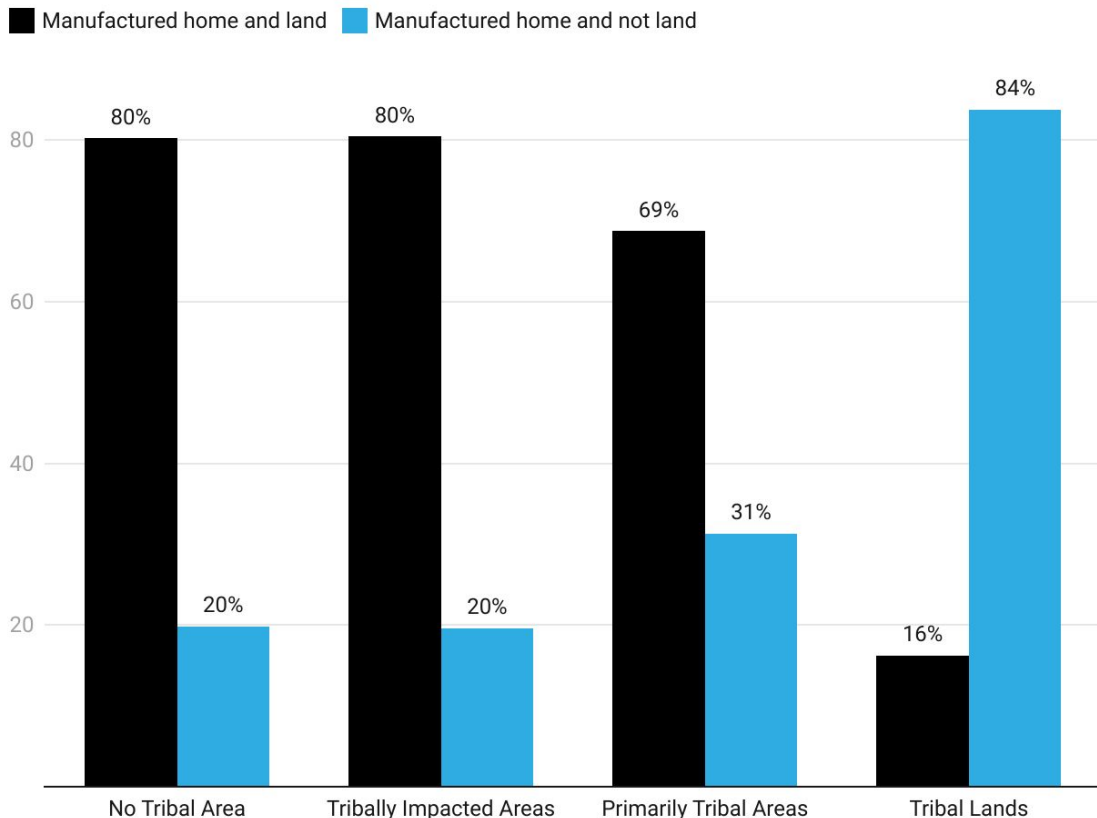
*noun, plural* **u·su·ries.**

1. the lending or practice of lending money at an exorbitant interest.
2. an exorbitant amount or rate of interest, especially in excess of the legal rate.

## Manufactured Housing Home Purchase Loans 2018-2021

Loans for most manufactured homes on tribal lands do not include the land itself.

On Tribal Land when the applicant or co-applicant is AIAN just 2% of loans include the land as well as the manufactured home.



2018-2021 HMDA data. Owner occupied, 1-4 unit homes.

Chart: NCRC • Source: CFPB • Created with Datawrapper

# Top Lenders Home Purchase Loans

On tribal land, Vanderbilt and 21st Mortgage made 74% of all loans on manufactured homes and 85% of manufactured home purchase loans.

Both are subsidiaries of Berkshire Hathaway.

Closing costs and interest rates charged by both companies greatly exceed the other lenders in the market.

	Lender	Lender Type	Manufactured Home	Site-built	Grand Total
1	VANDERBILT MORTGAGE AND FINANCE	Mortgage Company	272	2	274
2	ROCKET MORTGAGE	Mortgage Company		168	168
3	21ST	Mortgage Company	132		132
4	NOVA FINANCIAL & INVESTMENT CORPORATION	Mortgage Company		107	107
5	LOANDEPOTCOM	Mortgage Company	1	69	70
6	BOKF	Bank or Affiliate	4	57	61
7	WATERSTONE	Bank or Affiliate	8	48	56
8	DEL NORTE CU	Credit Union	13	43	56
9	MID AMERICA MORTGAGE	Mortgage Company	23	27	50
10	GATEWAY FIRST BANK	Mortgage Company	5	38	43

Additional 11 rows not shown.

Created with Datawrapper

# Top Lenders Home Purchase Loans

On tribal land, Vanderbilt and 21st Mortgage made 74% of all loans on manufactured homes and 85% of manufactured home purchase loans.

Both are subsidiaries of Berkshire Hathaway.

Closing costs and interest rates charged by both companies greatly exceed the other lenders in the market.

	Lender	Lender Type	Manufactured Home	Site-built	Grand Total
1	VANDERBILT MORTGAGE AND FINANCE	Mortgage Company	272	2	274
2	ROCKET MORTGAGE	Mortgage Company		168	168
3	21ST	Mortgage Company	132		132
4	NOVA FINANCIAL & INVESTMENT CORPORATION	Mortgage Company		107	107
5	LOANDEPOTCOM	Mortgage Company	1	69	70
6	BOKF	Bank or Affiliate	4	57	61
7	WATERSTONE	Bank or Affiliate	8	48	56
8	DEL NORTE CU	Credit Union	13	43	56
9	MID AMERICA MORTGAGE	Mortgage Company	23	27	50
10	GATEWAY FIRST BANK	Mortgage Company	5	38	43

Additional 11 rows not shown.

Created with Datawrapper

## What we found

- Native Americans on Tribal Land are being walled out of the traditional mortgage market that is key to wealth-building.
- Half of all home purchase loans on tribal lands are used to purchase manufactured mobile homes – four times the rate elsewhere.
- Tribal lands received less than one cent for each dollar loaned to small businesses in Arizona and New Mexico, starving Native American communities of economic opportunity.
- Tribal areas have far higher financial need than other rural areas.



Thank you!  
Q&A after the next speaker.

## Policy Recommendations

1. **Position Native-led institutions to direct effective capital and services to meet financial needs that traditional institutions are neglecting in tribal areas.**
2. **Implement all 21 specific policy recommendations from the latest Native Nations Institute (NNI)**
3. **Stop allowing the Government-Sponsored Enterprises (GSEs) to ignore their legal obligation to provide a secondary market for manufactured home loans.**
4. **Use the year-long on-ramping period for new Section 1071 small business loan data collection rules to fund studies that will generate a more robust understanding of how that much-anticipated data can be best used to assist economic development for AIAN communities.**
5. **Prioritize enforcement of Community Reinvestment Act (CRA) rules connected to Native Land Areas.**



**Homeownership in Indian  
Country**

**v.**

**Wealth & Asset Building**

**v.**

**Conflict & Renewal**



FEDERALLY  
RECOGNIZED TRIBES  
AND INDIAN  
RESERVATIONS in AZ

FEDERALLY  
RECOGNIZED TRIBES  
AND INDIAN  
RESERVATIONS in NM

- 22 Tribal Nations
1. Ak-Chin Indian Community
  2. Cocopah Tribe
  3. Colorado River Indian Tribes
  4. Ft. McDowell Yavapai Nation
  5. Fort Yavapai Tribe
  6. Gila River Indian Community
  7. Havasupai Tribe
  8. Hopi Tribe
  9. Hualapai Tribe
  10. Kaibab-Paiute Tribe
  11. Navajo Nation
  12. Pascua Yaqui Tribe
  13. Quechan Tribe
  14. Salt River Pima-Maricopa Indian Community
  15. San Carlos Apache Tribe
  16. San Juan Southern Paiute Indian Tribe
  17. Tohono O'odham Nation
  18. Tonto Apache Tribe
  19. Yavapai-Apache Nation
  20. Yavapai-Prescott Tribe
  21. White Mountain Apache Tribe
  22. Zuni Tribe

- 22 Pueblos & Tribes
1. Acoma Pueblo
  2. Cochiti Pueblo
  3. Isleta Pueblo
  4. Jemez Pueblo
  5. Kicarilla Apache Nation
  6. Laguna Pueblo
  7. Nambe Pueblo
  8. Navajo Nation
  9. Ohkay Owingeh Pueblo
  10. Pojoaque Pueblo
  11. San Felipe Pueblo
  12. Taos Pueblo
  13. San Ildefonso Pueblo
  14. Santa Clara Pueblo
  15. Santo Domingo Pueblo
  16. Tano Pueblo
  17. Santa Clara Pueblo
  18. Santo Domingo Pueblo
  19. Taos Pueblo
  20. Tesuque Pueblo
  21. Zuni Pueblo
  22. Zuni Pueblo

**1. Position Native-led institutions to direct effective capital and services to meet financial needs that traditional institutions are neglecting in tribal areas.**

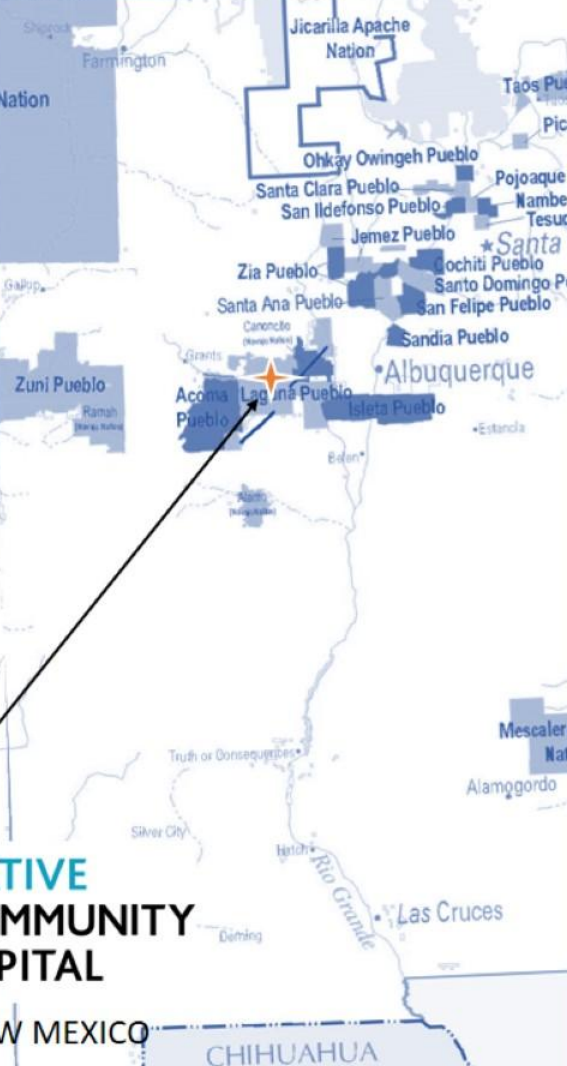
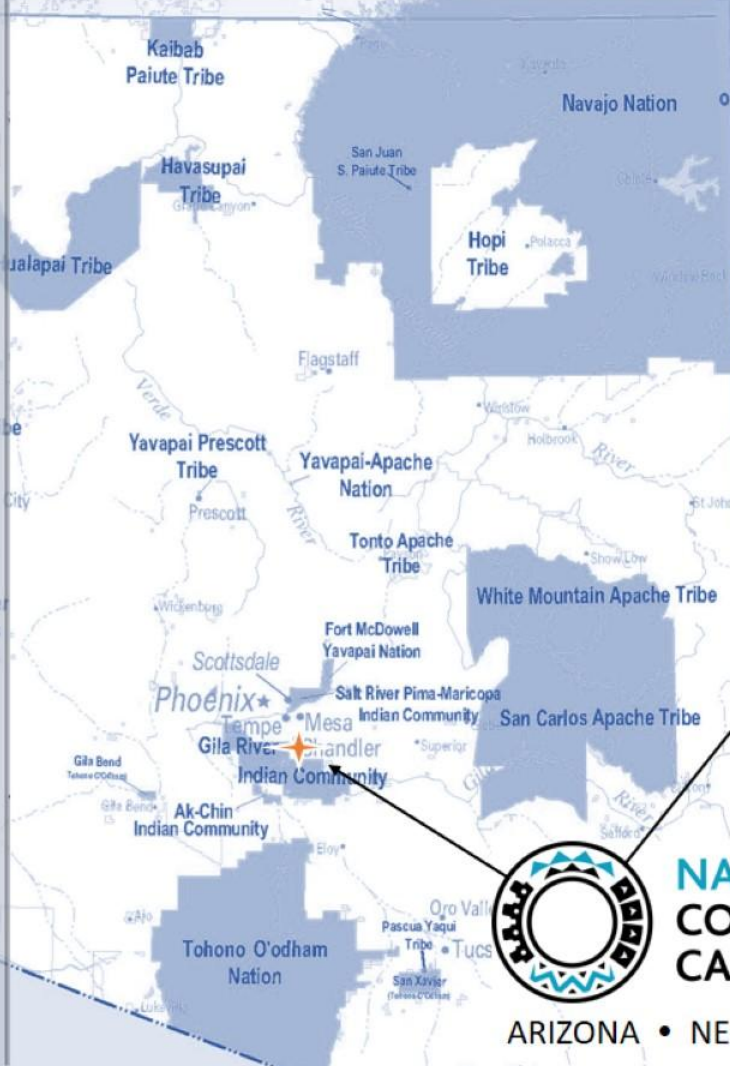


ARIZONA • NEW MEXICO



# FEDERALLY RECOGNIZED TRIBES AND INDIAN RESERVATIONS in AZ

- 22 Tribal Nations
1. Ak-Chin Indian Community
  2. Cocopah Tribe
  3. Colorado River Indian Tribes
  4. Ft. McDowell Yavapai Nation
  5. Fort Mojave Tribe
  6. Gila River Indian Community
  7. Havasupai Tribe
  8. Hopi Tribe
  9. Hualapai Tribe
  10. Kaibab-Paiute Tribe
  11. Navajo Nation
  12. Pascua Yaqui Tribe
  13. Quechan Tribe
  14. Salt River Pima-Maricopa Indian C.
  15. San Carlos Apache Tribe
  16. San Juan Southern Paiute
  17. Tohono O'odham Nation
  18. Tonto Apache Tribe
  19. Yavapai-Apache Nation
  20. Yavapai-Prescott Tribe
  21. White Mountain Apache Tribe
  22. Zuni Pueblo



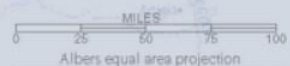
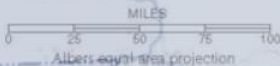
# FEDERALLY RECOGNIZED TRIBES AND INDIAN RESERVATIONS in NM

- 22 Pueblos & Tribes
1. Acoma Pueblo
  2. Cochiti Pueblo
  3. Isleta Pueblo
  4. Jemez Pueblo
  5. Jicarilla Apache Nation
  6. Laguna Pueblo
  7. Mescalero Apache Nation
  8. Nambe Pueblo
  9. Navajo Nation
  10. Ohkay Owingeh Pueblo
  11. Picuris Pueblo
  12. Pojoaque Pueblo
  13. San Felipe Pueblo
  14. San Ildefonso Pueblo
  15. Sandia Pueblo
  16. Santa Ana Pueblo
  17. Santa Clara Pueblo
  18. Santo Domingo Pueblo
  19. Taos Pueblo
  20. Tesuque Pueblo
  21. Zia Pueblo
  22. Zuni Pueblo



**NATIVE  
COMMUNITY  
CAPITAL**

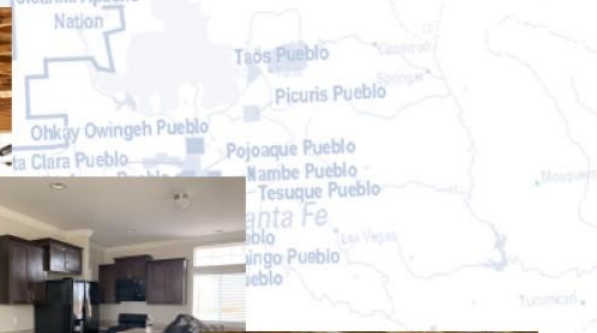
ARIZONA • NEW MEXICO



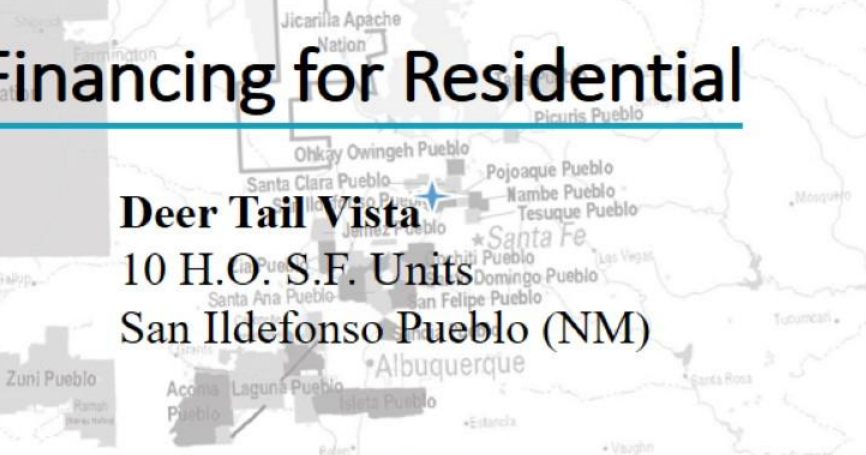
## NCC FY 2021 & 2022 HOME LOANS

ID	CLOSING	AMT.	LOCATION
<b>HOME LOANS (CONSTRUCTION)</b>			
1786	2/18/2021	149,642.91	Laguna Pueblo
1798	7/19/2021	276,340.00	San Felipe Pueblo
1797	7/26/2021	137,842.00	Isleta Pueblo
1804	8/20/2021	255,020.00	Jemez Pueblo
1803	10/25/2021	387,017.00	Ohkay Owingeh
1810	11/30/2021	327,729.00	Pojoaque Pueblo
1807	12/6/2021	150,000.00	Laguna Pueblo
1800	1/26/2022	161,079.00	Jemez Pueblo
<b>TOTAL</b>		<b>1,844,669.91</b>	

ID	CLOSING	AMT.	LOCATION
<b>HOME LOANS (REHABILITATION / ROOF REPAIRS)</b>			
1792	3/25/2021	6,751.22	Jemez Pueblo
1793	4/1/2021	11,128.35	Laguna Pueblo
1799	5/17/2021	10,000.00	Zuni Pueblo
1802	6/10/2021	9,413.08	Laguna Pueblo
1808	9/27/2021	10,885.08	Laguna Pueblo
1811	11/3/2021	4,752.08	Laguna Pueblo
1814	3/22/2022	14,855.68	Laguna Pueblo
1818	4/7/2022	20,419.68	Laguna Pueblo
1822	6/6/2022	19,211.36	Laguna Pueblo
1832	10/27/2022	28,318.74	Laguna Pueblo
1836	11/9/2022	10,878.15	San Ildefonso Pueblo
1833	11/30/2022	8,500.78	Ohkay Owingeh Pueblo
<b>TOTAL</b>		<b>155,114.20</b>	



# Leveraged Financing for Residential



**Deer Tail Vista**  
10 H.O. S.F. Units  
San Ildefonso Pueblo (NM)



SOURCES	AMOUNTS
NM Indian Affairs Department	\$575,000
RHED	\$300,000
IHBG (Current Year)	\$250,000
IHBG (Prior Years)	\$495,000
<b>NCC Loan (Guaranteed by HUD)</b>	<b>\$650,000</b>
ICDBG	\$500,000
<b>TOTAL</b>	<b>\$2,770,000</b>
Leveraged from IHBG	73%





Contractor  
Cherokee



Restaurant  
Navajo



Handyman  
Creek



Restaurant  
Oglala Lakota

DINEH

Jewelry  
Navajo



Fire Incident Mngt  
Pomo



Restaurant  
Navajo



New Media  
Shoshone-Bannock



Restaurant  
Jemez Pueblo



Sports Apparel  
Sicangu Lakota



Independent Trucker  
Navajo



Fashion Apparel  
Navajo



Restaurant  
Quechan



Medical Transport  
Navajo



Coffee Roaster  
Quechan



Pharmacy  
Pascua Yaqui





**SOUTHWEST  
NATIVE  
ASSETS  
COALITION**



**NATIVE  
COMMUNITY  
CAPITAL**



**CHANGE LABS**  
Indian Tribes



**NATIVE  
WOMEN  
LEAD**



INDIGENOUS ECONOMIC  
WELLBEING ALLIANCE



**NEW MEXICO  
COMMUNITY CAPITAL**



**TRIBAL  
HOMEOWNERSHIP  
COALITION OF THE  
SOUTHWEST**

FEDERALLY  
RECOGNIZED TRIBES  
AND INDIAN  
RESERVATIONS in AZ

- 22 Tribal Nations
1. Ak-Chin Indian Community
  2. Cocopah Tribe
  3. Colorado River Indian Tribes
  4. Ft. McDowell Yavapai Nation
  5. Fort Yavapai Tribe
  6. Gila River Indian Community
  7. Havasupai Tribe
  8. Hopi Tribe
  9. Hualapai Tribe
  10. Kaibab Paiute Tribe
  11. Navajo Nation
  12. Pascua Yaqui Tribe
  13. Quechan Tribe
  14. Salt River Pima-Maricopa Indian Community
  15. San Carlos Apache Tribe
  16. San Juan Southern Paiute Indian Tribe
  17. Tohono O'odham Nation
  18. Tonto Apache Tribe
  19. Yavapai-Apache Nation
  20. Yavapai-Prescott Tribe
  21. White Mountain Apache Tribe
  22. Zuni Pueblo

FEDERALLY  
RECOGNIZED TRIBES  
AND INDIAN  
RESERVATIONS in NM

- 22 Pueblos & Tribes
1. Acoma Pueblo
  2. Cochiti Pueblo
  3. Isleta Pueblo
  4. Jemez Pueblo
  5. Jicarilla Apache Nation
  6. Laguna Pueblo
  7. Mescalero Apache Nation
  8. Nambe Pueblo
  9. Navajo Nation
  10. Ohkay Owingeh Pueblo
  11. Pojoaque Pueblo
  12. San Ildefonso Pueblo
  13. San Felipe Pueblo
  14. San Geronimo Pueblo
  15. Santa Ana Pueblo
  16. Santa Clara Pueblo
  17. Santo Domingo Pueblo
  18. Taos Pueblo
  19. Tesuque Pueblo
  20. Towa Pueblo
  21. Zuni Pueblo
  22. Zuni Pueblo

# 2. Implement all 21 specific policy recommendations from the latest Native Nations Institute (NNI)



ARIZONA • NEW MEXICO





1492 – 1828

Colonial Era

- Mercantilism 1660's
- Bacon's Rebellion 1676

1828 – 1887

Treaty Era

- Indian Removal Act 1830 (Cherokee Trail of Tears, Navajo Long Walk (Hwéeldi), Apache Exodus, etc)

1887 – 1934

Allotment Era

- General Allotment Act / Dawes Severalty Act of 1887

1934 – 1945

Indian (Political) Reorganization Era

- Indian Reorganization Act (Wheeler-Howard Act) 1934

1945 – 1968

Termination & Relocation Era

- Indian Relocation Act 1956

1968 – 1988

Self-Governance Era

- Alaska Native Claims Settlement Act (ANCSA) 1971
- Indian Self-Determination and Education Assistance Act of 1975 (P.L. 93-638)

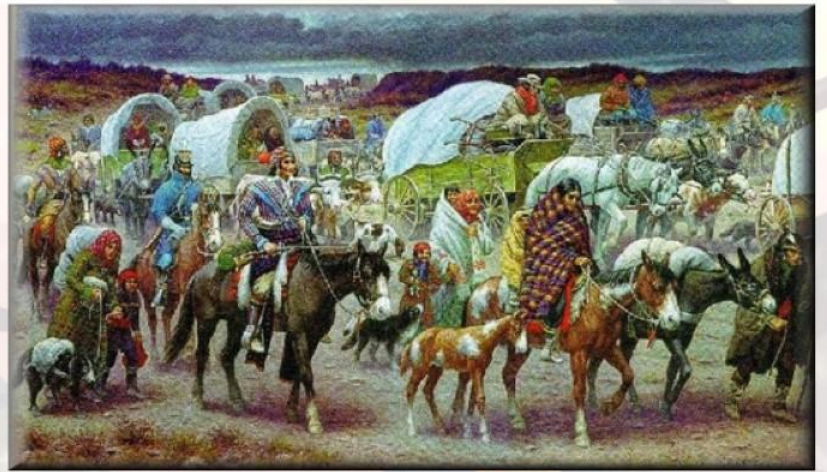
1988 – Present

Self-Determination Era

- Native Housing Assistance and Self Determination Act of 1996 (P.L. 103-330)
- Cobell Litigation 1996 - 2009 (\$3.4Bn Settlement)

## LEGACY OF FEDERAL – INDIAN LAW







Kaibab  
Paiute Tribe

Navajo Nation

Jicarilla Apache  
Nation

# DATA SOVEREIGNTY



Access to Capital  
Native Con



SE

IONS

ernance

MEXICO  
Cocopah  
Indian Tribe

CHIHUAHUA



Kaibab Paiute Tribe

Havasupai Tribe



# CENTER FOR INDIAN COUNTRY DEVELOPMENT



FEDERAL RESERVE BANK OF MINNEAPOLIS

# DATA SOVEREIGNTY



# RISE



Access to Capital and Credit in Native Communities



## NATIVE NATIONS INSTITUTE

Founded by the Udall Foundation & the University of Arizona

*Strengthening Indigenous Governance*

THE REPORT OF THE  
**NATIVE AMERICAN LENDING STUDY**

Community Development Financial Institutions Fund  
November 2008



# NCRC

National **Community Reinvestment** Coalition



Cocopah Indian Tribe

MEXICO

ARIZONA

Tucson

CHIHUAHUA

Carlsbad

FEDERALLY RECOGNIZED TRIBES AND INDIAN RESERVATIONS in AZ

1. Ak-Chin Indian Community
2. Cocopah Tribe
3. Colorado River Indian Tribes
4. Ft. McDowell Yavapai Nation
5. Fort Huachuca Tribe
6. Gila River Indian Community
7. Havasupai Tribe
8. Hopi Tribe
9. Hualapai Tribe
10. Kaibab-Paiute Tribe
11. Navajo Nation
12. Pascua Yaqui Tribe
13. Quechan Tribe
14. Salt River Pima-Maricopa Indian Community
15. San Carlos Apache Tribe
16. San Juan Southern Paiute Indian Tribe
17. Tohono O'odham Nation
18. Tonto Apache Tribe
19. Yavapai-Apache Nation
20. Yavapai-Prescott Tribe
21. White Mountain Apache Tribe
22. Zuni Tribe

FEDERALLY RECOGNIZED TRIBES AND INDIAN RESERVATIONS in NM

1. Acoma Pueblo
2. Cochiti Pueblo
3. Isleta Pueblo
4. Jemez Pueblo
5. Icarilla Apache Nation
6. Laguna Pueblo
7. Mescalery Apache Nation
8. Nambe Pueblo
9. Navajo Nation
10. Ohkay Owingeh Pueblo
11. Pojoaque Pueblo
12. Pajarito Pueblo
13. San Felipe Pueblo
14. San Ildefonso Pueblo
15. Sandia Pueblo
16. Santa Ana Pueblo
17. Santa Clara Pueblo
18. Santo Domingo Pueblo
19. Taos Pueblo
20. Tesuque Pueblo
21. Zia Pueblo
22. Zuni Pueblo

**3. Stop allowing the Government-Sponsored Enterprises (GSEs) to ignore their legal obligation to provide a secondary market for manufactured home loans.**

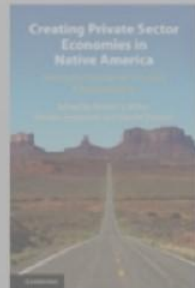


# 25+ Years of Indian Housing & Related Legislation (1994 – 2021)

"...during one of the first negotiated rulemaking sessions for NAHASDA, a tribal delegate recalled that the acronym for NAHASDA sounded very much like a word in his language (pronounced 'nah-as-da') and indeed waited patiently but perhaps too long for the success stories, the waiting for much of Indian Country was indeed a bitter-sweet reminder of the wait when a banker sincerely asked me why I was waiting for what he needed from the Office of the Comptroller of the Currency."

"...during one of the first negotiated rulemaking sessions for NAHASDA, a tribal delegate recalled that the acronym for NAHASDA sounded very much like a word in his language (pronounced 'nah-as-da') and indeed waited patiently but perhaps too long for the success stories, the waiting for much of Indian Country was indeed a bitter-sweet reminder of the wait when a banker sincerely asked me why I was waiting for what he needed from the Office of the Comptroller of the Currency."

*Native America* by Robert J. Miller (Editor)



## FEDERAL HOUSING FINANCE AGENCY



### DUTY TO SERVE



**1996**  
Native American Housing Assistance & Self-Determination Act of 1996 (NAHASDA)  
Expands 100% Mortgage Guarantee for Native Americans

**2001**  
Riegle Act of 1994  
Creation of the CDFI Fund - Initiative not established  
Establishes funds to create bank lenders across Indian Country

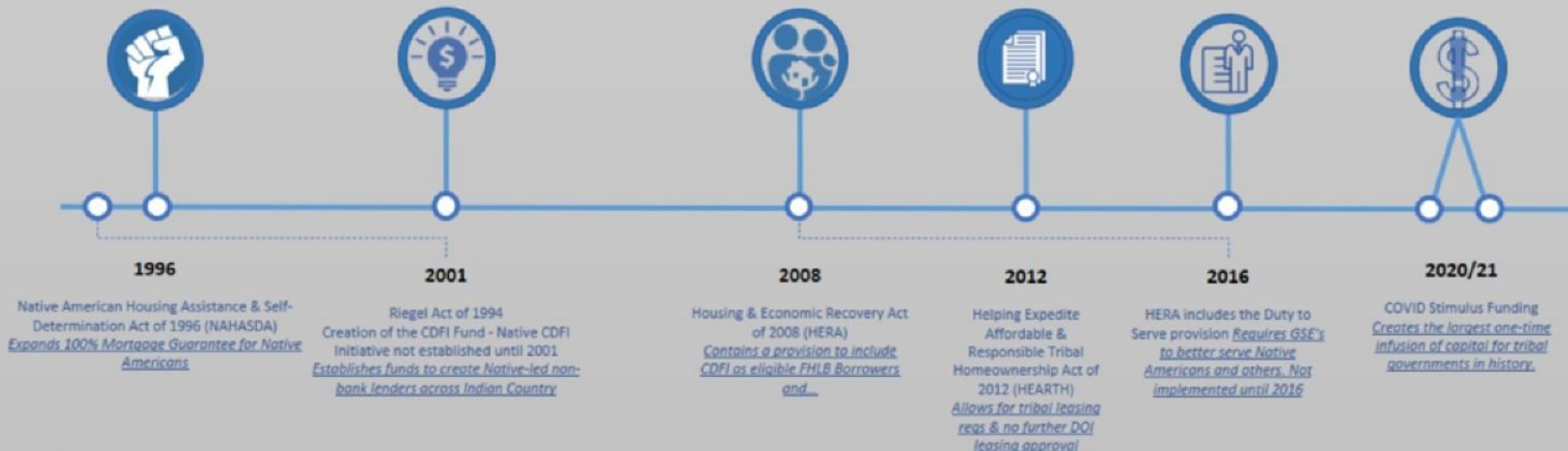
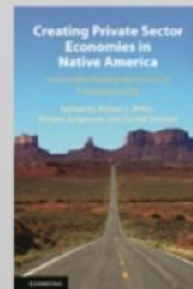
**2016**  
HERA includes the Duty to Serve provision Requires GSE's to better serve Native Americans and others. Not implemented until 2016

**2020/21**  
COVID Stimulus Funding Creates the largest one-time infusion of capital for tribal governments in history.

# 25+ Years of Indian Housing & Related Legislation (1994 – 2021)

“...during one of the first negotiated rulemaking sessions for NAHASDA, a tribal delegate recalled that the acronym for NAHASDA sounded very much like a word in his language (pronounced na-HAAZ-t’aa) that means “one who sits and waits patiently”. He recalled how tribes had indeed waited patiently but perhaps too long for the improvements the new law promised. Despite some early and scattered success stories, the waiting for much of Indian Country would continue for at least another two decades. A harbinger of the wait was forged in my mind when a banker sincerely asked me why he should go through the brain damage of doing a deal in Indian Country when he could get what he needed from the Office of the Comptroller of the Currency (i.e., bank regulator) by doing a deal with blacks or Hispanics.”

Excerpt from: *Creating Private Sector Economies in Native America* by Robert J. Miller (Editor)



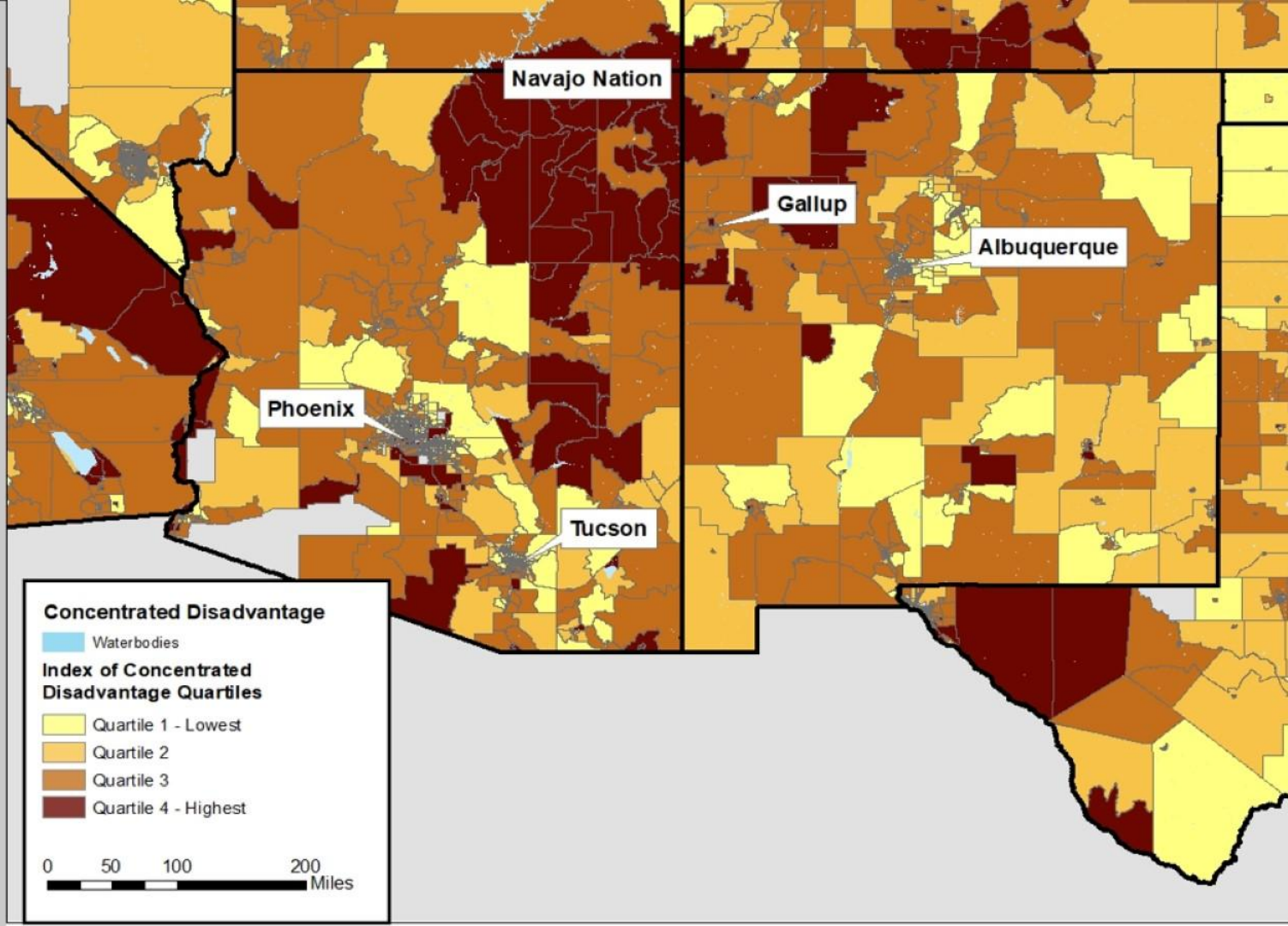


**4. Use the year-long on-ramping period for new Section 1071 small business loan data collection rules to fund studies that will generate a more robust understanding of how that much-anticipated data can be best used to assist economic development for AIAN communities.**

- 1. Ak-Chin Indian Community
- 2. Cocopah Indian Tribe
- 3. Colorado River Indian Tribe
- 4. Ft. McDowell Yavapai Nation
- 5. Fort Mojave Tribe
- 6. Gila River Indian Community
- 7. Havasupai Tribe
- 8. Hopi Tribe
- 9. Hualapai Tribe
- 10. Kaibab-Paiute Tribe
- 11. Navajo Nation
- 12. Pascua Yaqui Tribe
- 13. Quechan Tribe
- 14. Salt River Pima-Maricopa Indian Community
- 15. San Carlos Apache Tribe
- 16. San Juan Southern Paiute Indian Tribe
- 17. Tohono O'odham Nation
- 18. Tonto Apache Tribe
- 19. Yavapai-Apache Nation
- 20. Yavapai-Prescott Tribe
- 21. White Mountain Apache Tribe
- 22. Zuni Tribe







FEDERALLY  
RECOGNIZED TRIBES  
AND INDIAN  
RESERVATIONS in AZ

- 1. Ak-Chin Indian Community
- 2. Cocopah Tribe
- 3. Colorado River Indian Tribes
- 4. Ft. McDowell Yavapai Nation
- 5. Fort Mojave Tribe
- 6. Gila River Indian Community
- 7. Havasupai Tribe
- 8. Hopi Tribe
- 9. Hualapai Tribe
- 10. Kaibab-Paiute Tribe
- 11. Navajo Nation
- 12. Pascua Yaqui Tribe
- 13. Quechan Tribe
- 14. Salt River Pima-Maricopa Indian Community
- 15. San Carlos Apache Tribe
- 16. San Juan Southern Paiute Tribe
- 17. Tohono O'odham Nation
- 18. Tonto Apache Tribe
- 19. Yavapai-Apache Nation
- 20. Yavapai-Prescott Tribe
- 21. White Mountain Apache Tribe
- 22. Zuni Tribe

FEDERALLY  
RECOGNIZED TRIBES  
AND INDIAN  
RESERVATIONS in NM

- 1. Acoma Pueblo
- 2. Cochiti Pueblo
- 3. Isleta Pueblo
- 4. Jemez Pueblo
- 5. Jicarilla Apache Nation
- 6. Laguna Pueblo
- 7. Mescalero Apache Nation
- 8. Nambe Pueblo
- 9. Navajo Nation
- 10. Ohkay Owingeh Pueblo
- 11. Pojoaque Pueblo
- 12. San Ildefonso Pueblo
- 13. Santa Fe Pueblo
- 14. San Ildefonso Pueblo
- 15. Santa Ana Pueblo
- 16. Santo Domingo Pueblo
- 17. Taos Pueblo
- 18. Tesuque Pueblo
- 19. Zia Pueblo
- 20. Zuni Pueblo

# 5. Prioritize enforcement of Community Reinvestment Act (CRA) rules connected to Native Land Areas.



# REDLINING THE RESERVATION:

## The Brutal Cost Of Financial Services Inaccessibility In Native Communities

December 2023

Read the Report Online



Native and Euro-based civilizations meet with a handshake gesture from which everything blooms like from the center point of a basket. Like a basket, there are layers woven together with symbols of both cultures. Together they may harmonize – we're all part of the same universal system and we can co-exist and help each other.

Artist, J. Yazzie





# NATIVE COMMUNITY CAPITAL



**Dave Castillo, CEO**

**(855) 628-2272**

**dave@nativecap.org**

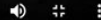
VIDEO TESTIMONIALS ABOUT...

# REDLINING THE RESERVATION

The Brutal Cost Of Financial Services  
Inaccessibility In Native Communities

...COMING SOON!

0:05 / 3:38





# Q&A