

Zip Code Position Paper-Office of Tribal Liaison

Using zip code-level data violates Tribal sovereignty because zip codes are not based on Tribal boundaries and using them to represent Native populations undermines Tribal authority and has the potential to misrepresent their data. This practice has significant negative consequences, including perpetuating harmful stereotypes and leading to misleading perceptions about Native populations. Indigenous Data Sovereignty movements, which assert the right of Tribal nations to govern their own data, provide the necessary framework to address these issues.

Inaccurate geographic representation

- **Zip codes are not Tribal lands.** As postal delivery areas, zip codes do not align with the geographic and political boundaries of Tribal nations. A single zip code can overlap multiple Tribal areas or include non-Native communities, and Tribal boundaries can cross multiple zip codes.
- **Oversimplification of complex jurisdictions.** Tribal lands often include a patchwork of checkerboard and overlapping jurisdictions. Zip codes obscure this complexity, making it difficult for agencies to accurately assign health data, economic activity, or other records to the correct Tribe or area.
- **Misleading data on health and well-being.** Using zip codes can mask or minimize inequities. For example, in a mixed zip code with predominantly non-Native affluent areas and Native low-income areas, data analysis can create a skewed picture that misrepresents the challenges faced by Indigenous residents.

Erasure and misrepresentation of Native populations

- **Perpetuates invisibility.** Aggregating data at the zip code level can erase Tribal populations from statistical analysis, particularly in areas where they are a minority. This renders them invisible in research and policymaking, hindering evidence-supported decision-making for Native communities.
- **Excludes Native voices.** Traditional data collection methods often collect data *about* Native people rather than *with* them (“Nothing about us, without us). Indigenous Data Sovereignty emphasizes that Tribal nations must have a say in how data is collected, interpreted, and used. Using external, ill-fitting data systems, like

zip codes, prevents Native people from being equal partners in the research process.

- **Perpetuates harmful narratives.** Historically, external researchers have used data to misrepresent Native cultures or create policies that undermine Tribal sovereignty. Using zip code data without Tribal input risks repeating this pattern by failing to reflect Indigenous lived experiences and worldviews.

Undermines Tribal self-determination

- **Disregards inherent governance rights.** Indigenous data sovereignty asserts that Tribal nations have the inherent right to govern their own people, lands, and resources, which includes the data about them. Using a non-Native metric like a zip code to define a Tribal population disregards this right and limits a Tribe's ability to self-govern based on its own priorities and data.
- **Leads to inequitable outcomes.** Inaccurate data from zip code-level analysis can harm Tribal nations by leading to resource misallocation and underfunding essential services. For example, inaccurate population counts can result in less federal funding for Tribal health, education, and social programs.
- **Fails to protect sensitive information.** Zip codes are not a robust enough geographic unit to protect the privacy of Native communities. Especially in rural areas, aggregating data by zip code can make it easier to identify individuals, potentially revealing sensitive information about vulnerable populations.

The path forward: Indigenous data sovereignty and governance

To respect Tribal sovereignty and governance, data collection must move toward an Indigenous-led approach that honors the principles of Indigenous Data Sovereignty.

Frameworks like the CARE principles (Collective Benefit, Authority to Control, Responsibility, and Ethics) are examples of how researchers can ethically engage with Nations, Pueblos, and Tribes regarding data. Ultimately, this means working with Tribal nations as sovereign governments to establish data-sharing agreements that recognize Tribal ownership and control over their own data.