2015-2019 North Dakota Consolidated Plan

Final Report
May 11, 2015

2015 – 2019 North Dakota Consolidated Plan for Housing and Community Development

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TABLE OF CONTENTS

I. EXECUTIVE SUMMARY **1**
A. Introduction 1
B. North Dakota Background and Trends 2
C. Strategic Goals of the North Dakota Consolidated Plan 4

II. CONSOLIDATED PLAN DEVELOPMENT PROCESS **11**
A. Introduction 11
B. Lead Agency 12
C. Geographic Area 12
D. Consultation 14
E. Citizen Participation Process 14
F. Public Hearings and Approval Processes 15

III. DEMOGRAPHIC AND ECONOMIC PROFILE **17**
A. Introduction 17
B. Demographic Trends 17
C. Economic Conditions 33
D. Summary 44

IV. HOUSING MARKET ANALYSIS **45**
A. Introduction 45
B. Housing Stock 45
C. Housing Production and Affordability 53
D. Household Housing Problems 61
E. Lead-Based Paint Hazards and Actions to Overcome Hazards 67
F. Public and Assisted Housing 73
G. Institutional Barriers to Affordable Housing 75
H. Summary 76

V. HOUSING AND HOMELESS NEEDS ASSESSMENT **77**
A. Introduction 77
B. Housing Needs Assessment 77
C. Unmet Housing Needs 79
D. Disproportionate Needs 80
E. Priority Housing Needs Rankings 80
F. Homeless Needs Assessment 83
G. Non-Homeless Special Needs Assessment 90
H. Summary 101

VI. COMMUNITY DEVELOPMENT NEEDS ASSESSMENT **103**
A. Introduction 103
B. Community Development Needs Assessment 103
C. Summary 107

VII. STRATEGIC PLAN **109**
A. Overview of Consolidated Plan National Goals 109
B. Context in Which Activities will be Conducted 110
C. Geographic Priorities 110
D. Priority Needs 111
E. Influence of Market Conditions 111
F. Anticipated Resources 112
G. Institutional Delivery Structure 113
H. Strategic Goals of the North Dakota Consolidated Plan 115
I. Monitoring 120

APPENDIX A: CITIZEN PARTICIPATION PLAN **121**

APPENDIX B: ANALYSIS OF IMPEDIMENTS **133**

APPENDIX C: ADDITIONAL PLAN DATA **149**

APPENDIX D: PUBLIC INVOLVEMENT PROCESS **153**

APPENDIX E: GLOSSARY **221**

PRIORITY NEEDS TABLES

Priority Housing Needs Tables **82**

I. EXECUTIVE SUMMARY

A. INTRODUCTION

In 1994, the U.S. Department of Housing and Urban Development (HUD) issued new rules consolidating the planning, application, reporting and citizen participation processes for four formula grant programs: Community Development Block Grants (CDBG), Home Investment Partnerships (HOME), and Emergency Solutions Grants (ESG). The new single-planning process was intended to more comprehensively fulfill three basic goals: to provide decent housing, to provide a suitable living environment and to expand economic opportunities. It was termed the *Consolidated Plan for Housing and Community Development*.

According to HUD, the Consolidated Plan is designed to be a collaborative process whereby a community establishes a unified vision for housing and community development actions. It offers entitlements the opportunity to shape these housing and community development programs into effective, coordinated neighborhood and community development strategies. It also allows for strategic planning and citizen participation to occur in a comprehensive context, thereby reducing duplication of effort.

As the lead agency for the Consolidated Plan, the North Dakota Department of Commerce (NDDOC) hereby follows HUD's guidelines for citizen and community involvement. Furthermore, it is responsible for overseeing these citizen participation requirements, those that accompany the Consolidated Plan and the Community Development Block Grant (CDBG), HOME Investment Partnerships, and the Emergency Solutions Grant (ESG) programs, as well as those that complement the NDDOC planning processes already at work in the state.

PURPOSE OF THE CONSOLIDATED PLAN

The *2015–2019 North Dakota Consolidated Plan for Housing and Community Development* is the comprehensive five-year planning document identifying the needs and respective resource investments in satisfying the state's housing, homeless, non-homeless special needs populations, community development and economic development needs.

GOALS OF THE CONSOLIDATED PLAN

The goals of the programs administered by the State of North Dakota are to provide decent housing, a suitable living environment and expanded economic opportunities for the state's low- and moderate-income residents. The State of North Dakota strives to accomplish these goals by maximizing and effectively utilizing all available funding resources to conduct housing and community development activities that will serve the economically disadvantaged residents of the state. By addressing need and creating opportunity at the individual and neighborhood levels, the State of North Dakota hopes to improve the quality of life for all residents of the state. These goals are further explained as follows:

- *Providing decent housing* means helping homeless persons obtain appropriate housing and assisting those at risk of homelessness; preserving the affordable housing stock; increasing availability of permanent housing that is affordable to low- and moderate-income persons without discrimination; and increasing the supply of supportive housing.
- *Providing a suitable living environment* entails improving the safety and livability of neighborhoods; increasing access to quality facilities and services; and reducing the isolation of income groups within an area through integration of low-income housing opportunities.
- *Expanding economic opportunities* involves creating jobs that are accessible to low- and moderate-income persons; making mortgage financing available for low- and moderate-income persons at reasonable rates; providing access to credit for development activities that promote long-term economic and social viability of the community; and empowering low-income persons to achieve self-sufficiency to reduce generational poverty in federally-assisted and public housing.

B. North Dakota Background and Trends

Demographic Profile

Between 2000 and 2013, the population in non-entitlement areas of North Dakota increased by over 40,000 people, starting at 446,748 in 2000 to 487,769 by 2013. Over the course of these thirteen years, total population growth in these areas equaled 9.2 percent. In 2010, the majority of the population, 89.7 percent, was white, although this group declined since 2000. The second largest racial group in 2010 was persons classified as American Indian at 6.8 percent, followed by two or more races, Black, "other", Asian, and Native Hawaiian/Pacific Islander. As for ethnicity, persons of Hispanic descent comprised 2.0 percent of the population. Geographic analysis of racial and ethnic data showed that certain areas throughout the state have higher concentrations of racial or ethnic minorities, including areas with disproportionate share of American Indian households. The two fastest growing age group in non-entitlement areas of North Dakota were those aged 55 to 64, followed by those aged 20 to 24. Some 17.2 percent of the population aged 5 or older in non-entitlement areas of North Dakota had one or more disabilities at the time of the 2000 census.

Economic Profile

From 1990 through 2013, the labor force in non-entitlement areas of North Dakota, defined as people either working or looking for work, rose from about 220,000 persons to 272,419 persons. Since the mid-1990s North Dakota's unemployment rate remained fairly steady with the national rate, although a couple percentage points lower. In 2010 when the nation unemployment rate spikes, unemployment in non-entitlement area of North Dakota continued to decline, reaching 2.9 percent in 2013. In 2013, the real average earning per job in the state of North Dakota was $52,733, and real per capita income was

$44,765, but both of these figures were below national averages. In non-entitlement areas of North Dakota the poverty rate in 2013 was 10.5 percent with 47,225 persons living in poverty.

NORTH DAKOTA HOUSING MARKET

In 2000, the State of North Dakota had 289,677 total housing units. Since that time, the total housing stock increased by a total of almost 50,000 units, reaching 339,313 units in 2013. According to the American Community Survey in 2012, North Dakota's non-entitlement housing stock included 162,804 single family units, some 22,758 apartment units and 20,068 mobile home units. Of the 215,445 housing units counted in non-entitlement areas of North Dakota in the 2010 census, some 184,878 units were occupied, with 134,869 counted as owner-occupied and 50,009 counted as renter-occupied. The vacancy rate for non-entitlement areas of the state was 14.2 percent in 2010. The construction value of single-family dwellings generally increased from 1980 through 2013, reaching close to $210,000 by 2013.

HOUSING AND HOMELESS NEEDS ASSESSMENT

There were 29,741 households below 80 percent MFI with housing need in 2011 in non-entitlement areas of the state.

Results from the 2014 Housing and Community Development Needs Survey showed that construction of new for-sale housing, construction of new rental housing, rental housing for very-low income households and homeowner housing rehabilitation were considered to have a high need for funding, along with rental housing rehabilitation and rental assistance. Comments received from public input meetings echoed these sentiments, and also indicated a need for senior-friendly housing and housing for large families.

Homeless needs in the non-entitlement area of the state are handled by the Statewide Continuum of Care organization. A count of the homeless population showed that more than 1,258 persons were homeless in 2014, including 120 homeless families with children and 115 chronically homeless persons.

Non-homeless special needs populations in the state include the elderly and frail elderly, persons living with disabilities, persons with alcohol or other drug addiction, victims of domestic violence, and persons living with HIV and their families. These populations are not homeless, but are at the risk of becoming homeless and therefore often require housing and service programs. The needs of the special needs groups are relative to the programs currently provided. The Housing and Community Development Needs Survey indicated the highest need for persons with substance abuse addiction, followed by victims of domestic violence and the frail elderly.

COMMUNITY DEVELOPMENT NEEDS ASSESSMENT

The 2014 Housing and Community Development Survey provided data on perceived community development needs. Respondents indicated that funding should be primarily devoted to housing and public facilities followed by economic development. Retention of existing businesses, expansion of existing business and attraction of new businesses were all top priorities in terms of economic development. Street and road improvements, sewer, and water system capacity improvements were high priorities for infrastructure development. Respondents noted a high need for childcare, healthcare and youth facilities, and the need for mental health/chemical dependency services, senior services, and transportation services.

C. STRATEGIC GOALS OF THE NORTH DAKOTA CONSOLIDATED PLAN

The following list presents the overriding strategies of the North Dakota Five-Year Consolidated Plan for Housing and Community Development, including selected performance criteria associated with each strategy and goal. Furthermore, there may be a need to direct such housing resources by use of project selection criteria, which may be updated annually, based upon year-to-year need and local circumstances.

The strategies the state will pursue over the next five years are as follows:

HOUSING STRATEGIES:

1. Preserve and improve the quality and condition of the existing rental and owner-occupied housing stock through rehabilitation of lower-income, disabled and elderly households

2. Fund homeownership opportunities for lower income residents

3. Provide funding to increase the supply of multifamily housing

HOMELESS STRATEGIES:

1. Support emergency shelters and transitional housing for the homeless

2. Create additional transitional and permanent supportive housing facilities

3. Provide financial support to assist those at imminent risk of homelessness, including rapid rehousing

4. Fund homeless prevention activities, including data collection and prevention services

NON-HOUSING COMMUNITY DEVELOPMENT PRIORITIES:

1. Encourage economic development opportunities that retain and expand existing businesses

2. Improve and enhance local public infrastructure, including water, sewer, streets and sidewalks

3. Encourage communities to address local public facilities and service needs

4. Encourage communities to do strategic planning

Each of the priorities identified above, as well as the objectives consistent with each strategy are discussed in greater detail below. Performance measurement criteria are presented at the end of each priority narrative.

HOUSING STRATEGIES

The population throughout North Dakota continues to increase, and this growth is occurring more quickly in certain areas of the state with dramatic economic change. The demand for quality affordable homeowner and rental housing will continue to rise along with population, but at different rates depending on the local community's economic, demographic and housing market conditions. As the State of North Dakota strives to meet the needs of its residents, housing remains a top priority.

1. Preserve and improve the quality and condition of the existing rental and owner-occupied housing stock through rehabilitation of lower-income, disabled and elderly households

NDDOC will offer funding to rehabilitation activities that address the needs of lower-income and elderly households, including rental and owner-occupied rehabilitations.

Outcome: Sustainability

Objective: Provide Decent Affordable Housing

Funding: HOME, Housing Trust Fund, CDBG

Five-Year Goal:

Rental Units Rehabilitated	Number of Household Housing Units
Homeowner Housing Rehabilitated	Number of Households Housing Units

2. Fund homeownership opportunities for lower income residents

NDDOC will offer down payment assistance to low-income households purchasing homes in high-cost areas of the state. The program will provide low-interest, deferred loans to be used for down payment and closing costs.

Outcome: Affordability

Objective: Provide Decent Affordable Housing

Funding: HOME, Housing Trust Fund

Five-Year Goal:

Direct Financial Assistance to Homebuyers	Number of Households Assisted

3. Provide funding to increase the supply of multifamily housing

NDDOC will fund eligible nonprofit and for-profit housing builders with financial subsidies for the development of rental properties affordable to low-income households.

Outcome: Availability/Accessibility

Objective: Provide Decent Affordable Housing

Funding: HOME, Housing Trust Fund, CDBG

Five-Year Goal:

Rental Units Constructed	Number of Household Housing Units

HOMELESS STRATEGIES

The State of North Dakota is committed to helping to work towards the goals of reducing and ending homelessness throughout the State by prioritizing homelessness with funding and program initiatives.

1. Support emergency shelters and transitional housing for the homeless

NDDOC will provide funding for a number of services needed by homeless persons, such as case management, health services, and outreach. Funding will also be provided to assist with shelter maintenance and operations.

Outcome: Sustainability

Objective: Create Suitable Living Environments

Funding: ESG

Five-Year Goal:

Homeless Person Overnight Shelter Number of Persons Assisted

2. Create additional shelters, transitional and permanent supportive housing facilities

The State of North Dakota supports efforts to acquire additional housing structures for homeless shelters, transitional and permanent supportive housing in the non-entitled areas.

Outcome: Availability/Accessibility

Objective: Provide Decent Affordable Housing

Funding: ESG, CDBG

Five-Year Goal:

Overnight/Emergency Shelter/ Transitional Housing Beds added
Number of bed added

3. Provide financial support to assist those at imminent risk of homelessness, including rapid re-housing

The Department of Commerce will provide financial support, including providing rapid re-housing.

Outcome: Affordability

Objective: Create Suitable Living Environments

Funding: ESG

Five-Year Goal:

Rapid Re-housing Number of Households Assisted

4. Fund homeless prevention activities, including data collection and prevention service

The Department of Commerce will fund prevention activities, including services and outreach for persons at imminent risk of becoming homeless.

Outcome: Sustainability

Objective: Create Suitable Living Environments

Funding: ESG

Five-Year Goal:

Homeless Prevention Number of Persons Assisted

NON-HOUSING COMMUNITY DEVELOPMENT PRIORITIES

Throughout the state of North Dakota, there are various community development needs, including public facilities, infrastructure as well as the need for additional planning. This Plan prioritizes funds to meet those needs to serve the residents of the State.

1. Encourage economic development opportunities that retain and expand existing businesses

NDDOC will participate in funding economic development activities that retain or expand existing businesses and jobs.

Outcome: Availability/Accessibility

Objective: Create Economic Opportunities

Funding: CDBG

Five-Year Goal:

Jobs Created/Retained	Number of jobs
Businesses Assisted	Number of Businesses Assisted

2. Help improve and enhance local public infrastructure including water, sewer, streets and sidewalks

The Department of Commerce will participate in funding activities that improve the existing infrastructure through updating street, water and wastewater systems and sidewalks/paths.

Outcome: Sustainability

Objective: Create Suitable Living Environment

Funding: CDBG

Five-Year Goal:

Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Number of households assisted

3. Encourage communities to address local public facilities and service needs

The Department of Commerce will participate in funding quality public service activities that benefit the low/mod populations throughout North Dakota.

Outcome: Availability/Accessibility

Objective: Create Suitable Living Environments

Funding: CDBG

Five-Year Goal:

Public service activities for Low/Moderate Income Housing Benefit
Number of households assisted

4. Encourage communities to do strategic planning

As part as the on-going effort to improve the quality of living environments for North Dakota residents, the Department of Commerce will provide funding for planning activities for local units of government.

Outcome: Sustainability

Objective: Create Suitable Living Environments

Funding: CDBG

Five-Year Goal:

Other: Planning Activities

5. Engage in funding disaster relief areas

As part as the on-going effort to combat the effects of flooding, NDDOC will utilize CDBG-DR funds to address these needs in affected areas throughout the state.

Outcome: Sustainability

Objective: Create Suitable Living Environments

Funding: CDBG

Five-Year Goal:

Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit Number of households assisted

II. CONSOLIDATED PLAN DEVELOPMENT PROCESS

A. INTRODUCTION

In 1994, the U.S. Department of Housing and Urban Development issued new rules consolidating the planning, application, reporting and citizen participation processes for four formula grant programs: Community Development Block Grants (CDBG), Home Investment Partnerships (HOME), Emergency Solutions Grants (ESG) and Housing Opportunities for People with AIDS (HOPWA). Termed the *Consolidated Plan for Housing and Community Development*, the new single-planning process was intended to more comprehensively fulfill three basic goals:

1. *Provide decent housing,* which involves helping homeless people obtain appropriate housing, retaining the affordable housing stock, increasing the availability of permanent affordable housing for low-income households without discrimination and/or increasing supportive housing to assist persons with special needs.
2. *Provide a suitable living environment*, which means improving the safety and livability of neighborhoods, including the provision of adequate public facilities; reducing isolation of income groups within communities through distribution of housing opportunities for persons of low income; revitalization of deteriorating or deteriorated neighborhoods; restoring and preserving natural and physical features with historic, architectural, and aesthetic value; as well as conserving energy resources.
3. *Expand economic opportunities*, which emphasizes job creation and retention, providing access to credit for community development, and assisting low-income persons to achieve self-sufficiency in federally-assisted and public housing.

The Consolidated Plan is a three-part process that comprises:

1. Development of a five-year strategic plan;
2. Preparation of annual action plans; and
3. Submission of annual performance and evaluation reports.

The first element referred to above, the strategic plan, also has three parts:

1. A housing market analysis;
2. A housing, homeless, and community development needs assessment; and,
3. Establishment of long-term strategies for meeting the priority needs of the state.

HUD asks that priority objectives be built upon specified goals that flow from quantitative and qualitative analysis of needs identified in the five-year planning process. Program funding is ensured by completing these documents on time and in a format acceptable to HUD.

Furthermore, the North Dakota Consolidated Plan is designed to be a collaborative process whereby the state can establish a unified vision for housing and community development

actions. It offers the state the opportunity to shape housing and community development programs into effective and coordinated housing and community development strategies. It also creates the opportunity for citizen participation and strategic planning to take place in a comprehensive context and to reduce duplication of effort throughout North Dakota.

Thus, the Consolidated Plan functions as:

- A planning document for the non-entitlement areas of North Dakota that builds on a participatory process among citizens, organizations, businesses and other stakeholders;
- A submission document for federal funds under HUD's formula grant programs;
- A strategy document to be followed in carrying out HUD's programs; and
- A management tool for assessing performance and tracking results.

The 2015-2019 North Dakota Consolidated Plan for Housing and Community Development is the comprehensive five-year planning document identifying needs and respective resource investments in satisfying the state's housing, homelessness, non-homeless special population, community development and economic development needs.

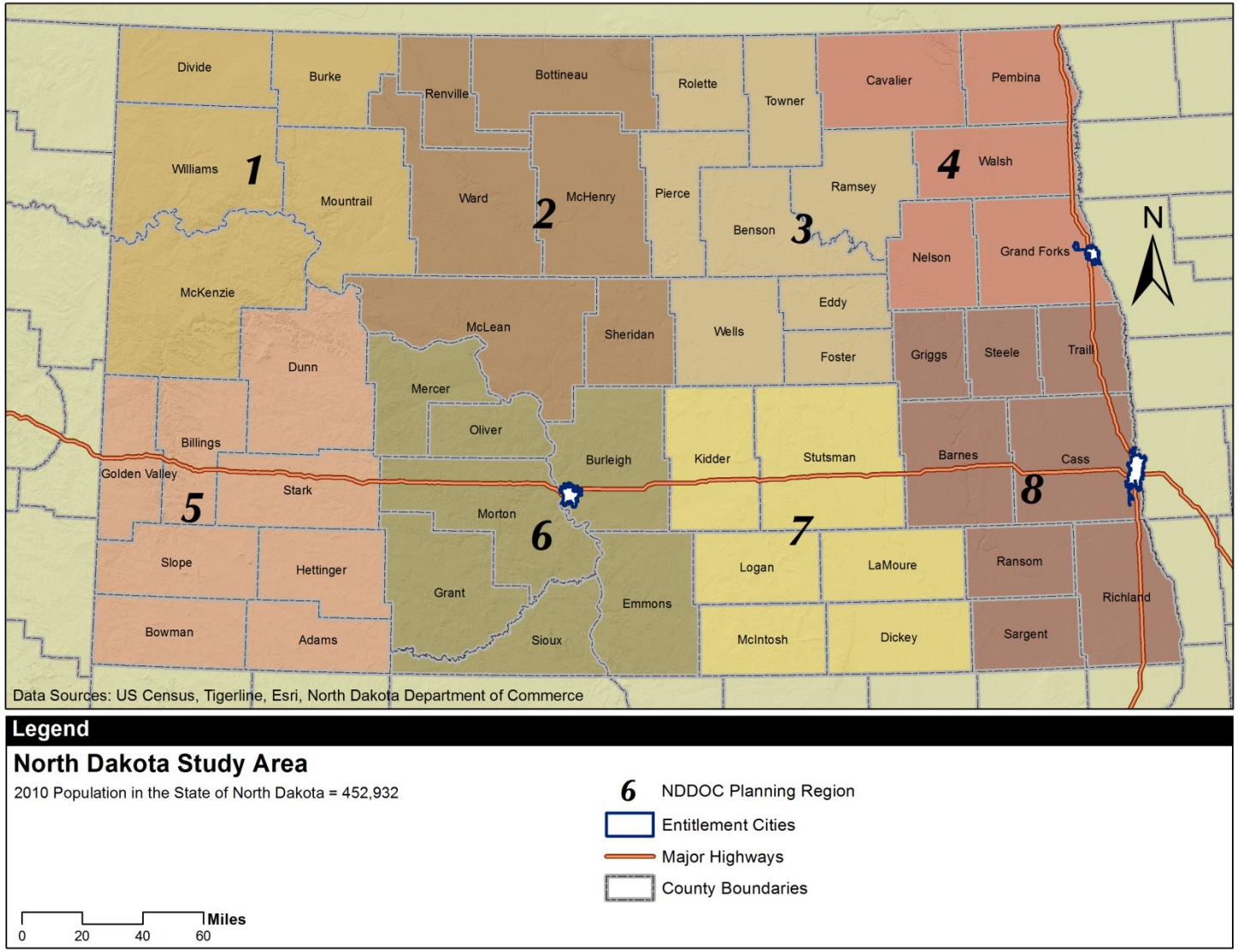
B. Lead Agency

The North Dakota Department of Commerce, Division of Community Services, is designated as the lead agency for developing, implementing, monitoring, and reporting on the achievements of the Consolidated Plan. Other entities that play a key role in the implementation of the Plan are the state's eight Regional Planning Councils, seven Community Action Agencies, Community Development Housing Organizations, non-profits, the North Dakota Housing Finance Agency, Cass County Housing Authority, Stutsman County Housing Authority, and the cities of Bismarck and Grand Forks.

C. Geographic Area

North Dakota's Consolidated Plan covers the non-entitlement areas of the state. The entitlements in North Dakota include Bismarck, Fargo and Grand Forks. CDBG funds are distributed to eight regions, as shown below. Additional data is presented throughout this document as it pertains to each region.

Map I.1
North Dakota
Census Bureau 2010



D. CONSULTATION

When preparing the Consolidated Plan, consultation is made with public and private agencies that provide housing, health and social services. State health and child welfare agencies are also consulted concerning lead-based paint hazards. Through the use of focus groups, surveys and direct communication, the Department of Commerce collected input from a variety of statewide and local agencies. This input was utilized to help develop the Plan and determine priorities for the State.

The state's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies

The Department of Commerce encourages the coordination of public and private housing and service providers by utilizing statewide information to determine priorities for funding throughout the state. The Department of Commerce prioritizes funding activities that include coordination between public and private housing and service providers.

Coordination and Consultation with the Continuum of Care

The ESG program works very closely with the nearly 25 shelters in the state and the North Dakota Homeless Coalition to identify and address the needs of the homeless and the chronic homeless. The DOC works closely with the North Dakota Coalition for the Homeless, which is the lead agency for the Statewide CoC.

Funds are allocated based on the priority needs as established in this Plan. Through the planning process, the State consulted with the Statewide CoC and service agencies to determine how the needs of the homeless will best be addressed and how the State can help fulfil the goals to reduce and end homeless throughout North Dakota.

E. CITIZEN PARTICIPATION PROCESS

Public involvement began in November 2014 and extended over a period of several months. Two key steps were taken in the involvement process. One was the implementation of three focus group meetings, an assembly of experts in housing and community development issues for the State of North Dakota, and the other was a series of public input meetings during which citizens were provided the opportunity to offer feedback and input regarding the Consolidated Plan.

The focus groups were held in January, 2015 with the purpose of drawing upon the expert knowledge of stakeholders and gaining insight into their thoughts on barriers and constraints encountered in North Dakota's housing and community development arena. These focus groups included affordable housing, homelessness, and infrastructure. Transcripts from the focus groups are included in the Appendix of this document, and input is incorporated in a variety of ways throughout this document.

Eight public input meetings were held in November, 2014 in each of the regions to offer the public an additional opportunity to offer feedback on the Consolidated Plan. An

additional public input meeting was held in February, 2015 in Bismarck to draw additional feedback. Summaries from each of the eight regional public input meetings are included in Appendix E of this document. A transcript of the February public meeting is also included in Appendix E. Input received during these meetings was integrated into the Plan, as well as influencing the priorities established here-in.

F. Public Hearings and Approval Processes

The draft report for public review was released on March 27, 2015 which initiated a 30-day public review period. Two public presentations of the draft were made in Bismarck on April 15. These meetings were also advertised in mass media outlets.

Plan Evaluation

NDDOC's evaluation of its past performance has been completed in a thorough Consolidated Annual Performance and Evaluation Report (CAPER). These documents state the objectives and outcomes identified in each year's Annual Action Plan and includes an evaluation of past performance through measurable goals and objectives compared to actual performance. These documents can be found on NDDOC's website at:

http://www.communityservices.nd.gov/communitydevelopment/ConsolidatedPlan/

III. Demographic and Economic Profile

A. Introduction

The following narrative examines a broad range of socioeconomic characteristics including population, race and ethnicity, disability, poverty and unemployment rates. Data were gathered from the U.S Census Bureau, the Bureau of Economic Analysis, the Bureau of Labor Statistics, and HUD. This information was used to analyze the state's current social and economic complexion and determine prospective trends and patterns in growth in the next five years.

B. Demographic Trends

The Census Bureau reports significant levels of detail about the demographic characteristics of geographic areas in each of the decennial census enumerations. However, between these large and detailed counts of the population, more general demographic estimates are released. Both sets of information are presented in this section.

Total Population

Table III.1, below, shows the changes in population that have occurred in North Dakota from 2000 through the most recent population estimates for 2013. For the state overall, the population increased from 642,200 in 2000 to over 723,393 in 2013. The population for the non-entitlement areas of the State increased from 446,748 to 487,769 in 2013, an increase of 9.2 percent.

Table III.1
Population Estimates
State of North Dakota
2000 and 2010 Census and Intercensal Estimates

Year	Bismarck city	Fargo city	Grand Forks city	Non-Entitlement Areas of North Dakota	North Dakota
2000	55,532	90,599	49,321	446,748	642,200
2001	55,888	92,144	49,337	441,693	639,062
2002	56,275	92,782	49,505	439,606	638,168
2003	56,587	93,919	49,707	438,604	638,817
2004	56,885	96,400	51,437	439,983	644,705
2005	57,700	97,259	51,356	439,774	646,089
2006	58,542	99,104	52,059	439,717	649,422
2007	59,350	100,773	51,669	441,030	652,822
2008	59,895	102,409	52,423	442,842	657,569
2009	60,643	104,490	52,371	447,464	664,968
2010	61,272	105,549	52,838	452,932	672,591
2011	62,821	107,620	52,721	461,705	684,867
2012	64,777	110,142	53,533	472,893	701,345
2013	67,034	113,658	54,932	487,769	723,393

POPULATION BY REGION

Table III.2, below, shows the population by region from 2000 to 2013. Within the non-entitlement areas, Region 2 had the largest population in 2013, as well as the greatest rate of growth, increasing by over 90,500 during the course of those 13 years. Regions 1, 5, 7 and 8 all experienced growth. Regions 3, 4 and 6, however, declined in population.

Table III.2
Population Estimates
State of North Dakota
2000 and 2010 Census and Intercensal Estimates

Year	Region 1	Region 2	Region 3	Region 4	Region 5	Region 6	Region 7	Region 8	Non-Entitlement Areas of North Dakota	North Dakota
2000	27,781	8,889	43,168	41,477	71,528	61,454	74,886	38,365	367,548	642,200
2001	27,433	87,064	42,591	40,334	71,718	60,183	74,488	37,882	441,693	639,062
2002	27,613	86,262	42,180	39,446	72,276	59,485	74,749	37,595	439,606	638,168
2003	27,509	85,561	41,721	38,981	73,420	58,856	75,082	37,474	438,604	638,817
2004	27,513	86,259	41,535	38,823	74,561	58,478	75,387	37,427	439,983	644,705
2005	27,692	85,895	41,224	38,207	75,493	58,092	75,826	37,345	439,774	646,089
2006	27,932	85,757	40,771	37,595	76,215	57,521	76,606	37,320	439,717	649,422
2007	28,400	85,802	40,561	36,826	77,328	56,901	77,528	37,684	441,030	652,822
2008	28,858	86,209	40,512	36,418	78,141	56,368	78,363	37,973	442,842	657,569
2009	29,999	88,138	40,339	35,879	79,035	56,199	79,462	38,413	447,464	664,968
2010	30,829	89,967	40,672	35,681	79,932	56,363	80,592	38,896	452,932	672,591
2011	33,543	93,325	40,953	35,365	80,695	56,185	81,509	40,130	461,705	684,867
2012	36,972	95,787	41,311	35,454	82,182	56,139	82,676	42,372	472,893	701,345
2013	41,223	99,389	41,630	35,627	85,121	56,292	84,421	44,066	487,769	723,393

POPULATION BY RACE AND ETHNICITY

As the population of North Dakota grew between 2000 and 2010, the racial and ethnic composition of the state shifted as well. Overall, the population grew by 1.4 percent in non-entitlement areas, though different racial and ethnic groups within the overall population grew at different rates. The white population, which accounted for the largest proportion of North Dakotans in both years, decreased by 0.7 percent. The white population comprised a smaller proportion of the population in 2010 than it had in 2000. The racial group with the largest rate of change in the decade was persons who identified as Native Hawaiian/Pacific Islander, which grew by 62.6 percent. This was followed by Asians with a change of 60.7 percent.

The Hispanic population grew at a faster rate than the non-Hispanic population. In 2000, Hispanic residents accounted for 1.2 percent of the population. After experiencing a rate of growth of 68.0 percent between 2000 and 2010, the Hispanic population came to account

for 2.0 percent of the total population. Meanwhile, the non-Hispanic population only grew by 0.6 percent and the proportion of non-Hispanic North Dakota residents fell by less than one percentage point.

Table III.3
Population by Race and Ethnicity
Non-Entitlement Areas of North Dakota
2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	409,186	91.6%	406,246	89.7%	-0.7%
Black	2,412	.5%	3,647	.8%	51.2%
American Indian	26,969	6.0%	30,851	6.8%	14.4%
Asian	1,401	.3%	2,251	.5%	60.7%
Native Hawaiian/ Pacific Islander	147	.0%	239	.1%	62.6%
Other	1,757	.4%	2,290	.5%	30.3%
Two or More Races	4,876	1.1%	7,408	1.6%	51.9%
Total	**446,748**	**100.0%**	**452,932**	**100.0%**	**1.4%**
Non-Hispanic	441,465	98.8%	444,058	98.0%	0.6%
Hispanic	5,283	1.2%	8,874	2.0%	68.0%

RACE AND ETHNICITY BY REGION

Various regions had different racial and ethnic distributions. Tables regarding race and ethnicity for each region are included in the Technical Appendix. Region 1 experienced a shift in its racial and ethnic makeup between 2000 and 2010. The Black, Asian, Native Hawaiian/Pacific Islander, "other" and Hispanic populations all experienced a growth rate over 100 percent. The white population experienced a lower growth rate of 9.6 percent.

Region 2 experienced a 2.1 percent growth rate overall, with the white population declining by 0.4 percent. The Hispanic population grew by 82.7 percent. All minority populations grew at a rate higher than the region average.

The population in Region 3 declined between 2000 and 2010, resulting in a 5.8 percent reduction. The white population declined by 14.9 percent, while all minority populations saw some measure of growth.

Region 4 also saw a decline in population between 2000 and 2010, with a 14 percent decrease. The white, black, Asian and two or more races all saw a decline during this decade. The Hispanic population saw an 18.6 percent increase, while the non-Hispanic population declined by 15.1 percent.

Region 5 experienced an 11.7 percent growth between 2000 and 2010. The racial groups with the greatest rate of change included the black population at 373 percent, the Asian population at 271.5 percent, and the Native Hawaiian/Pacific Islander population at 150 percent. The white population grew at a slower rate than average.

While Region 6 experienced an 8.3 percent decline in population, different racial and ethnic groups changed at varying rates. All minority populations increased during this time

frame, while the white population declined. The white population still accounted for 96.8 percent of the population at the end of the decade, however, after facing a 9.6 percent decrease.

The population in Region 7 grew by 7.6 percent overall between 2000 and 2010. The black, "other" and Hispanic population increased at a rate exceeding 100 percent, more than doubling in size. The white population grew at a rate lower than the average for the region, leaving the proportion of the white population more than a percentage point lower than at the beginning of the decade.

Region 8 grew by 1.4 percent during the decade, and experienced some racial and ethnic shifts throughout the decade. Several racial groups doubled or tripled in size, including the black population, the Asian population, those classified as "other" and the Hispanic population. The white population declined by 0.7 percent, but still comprised 94.9 percent of the total population for the region.

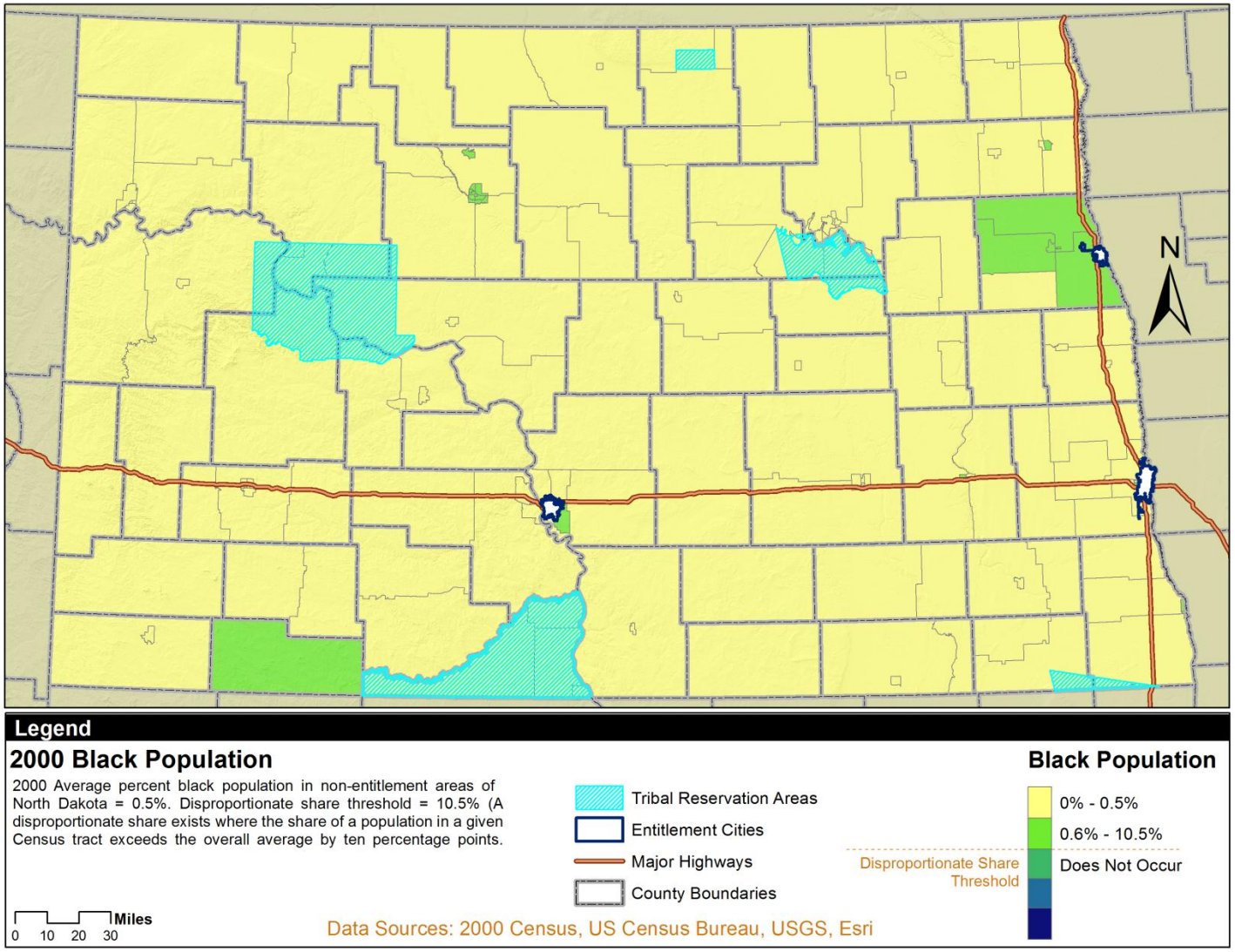
STATEWIDE RACE AND ETHNICITY

Geographic analysis of racial distribution for the non-entitlement areas of the state was conducted by calculating the percentage share of total population within each census tract of the particular sub-population; i.e., racial or ethnic group. That share was then plotted on a geographic map. The goal of this analysis was to identify areas with disproportionate concentrations of each sub-population. HUD defines a population as having a disproportionate share when a portion of a population is more than 10 percentage points higher than the jurisdiction average. For example, the Asian population accounted for 0.5 percent of the total population of the non-entitlement areas of the State in 2010—accordingly, the disproportionate share threshold for that population was 10.5 percent in that year. Any areas in which more than 10.5 percent of the population was white were therefore said to hold a disproportionate share of white residents.

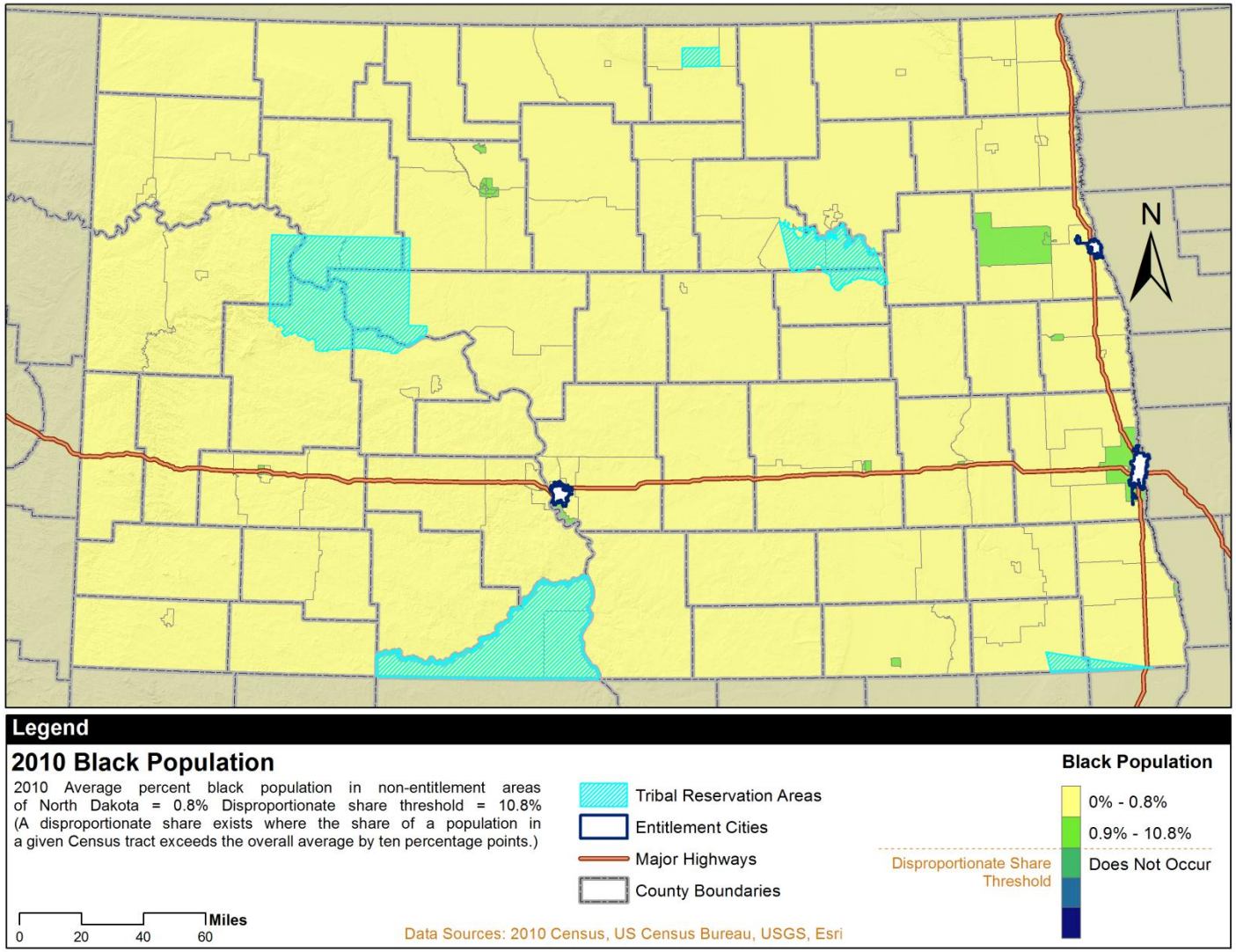
In the year 2000, white residents accounted for 91.6 percent of the population of the non-entitlement area of North Dakota. It was therefore, impossible for any area to have disproportionate share as it would exceed 100 percent. By 2010 the white population had grown by 2.1 percent since 2000, which was below the state rate of 4.7 percent. This left the white population with a lower proportion of the population, with 90.0 percent of North Dakotans in non-entitlement areas.

By contrast, the black population accounted for only 0.5 percent of the population in 2000. The state saw no areas with disproportionate share of blacks in the non-entitlement areas of North Dakota in 2000. Similarly, in 2010, the black population did not present disproportionate share in any areas throughout the non-entitlement areas of the state. The black population did outpace the non-entitlement state average growth, having a 51.2 percent increase between 2000 and 2010. The change in distribution of black residents is shown in Maps III.3 and III.4 on the following pages.

Map III.3
2000 Black Population
Non-entitlement areas of North Dakota
2000 Census Data



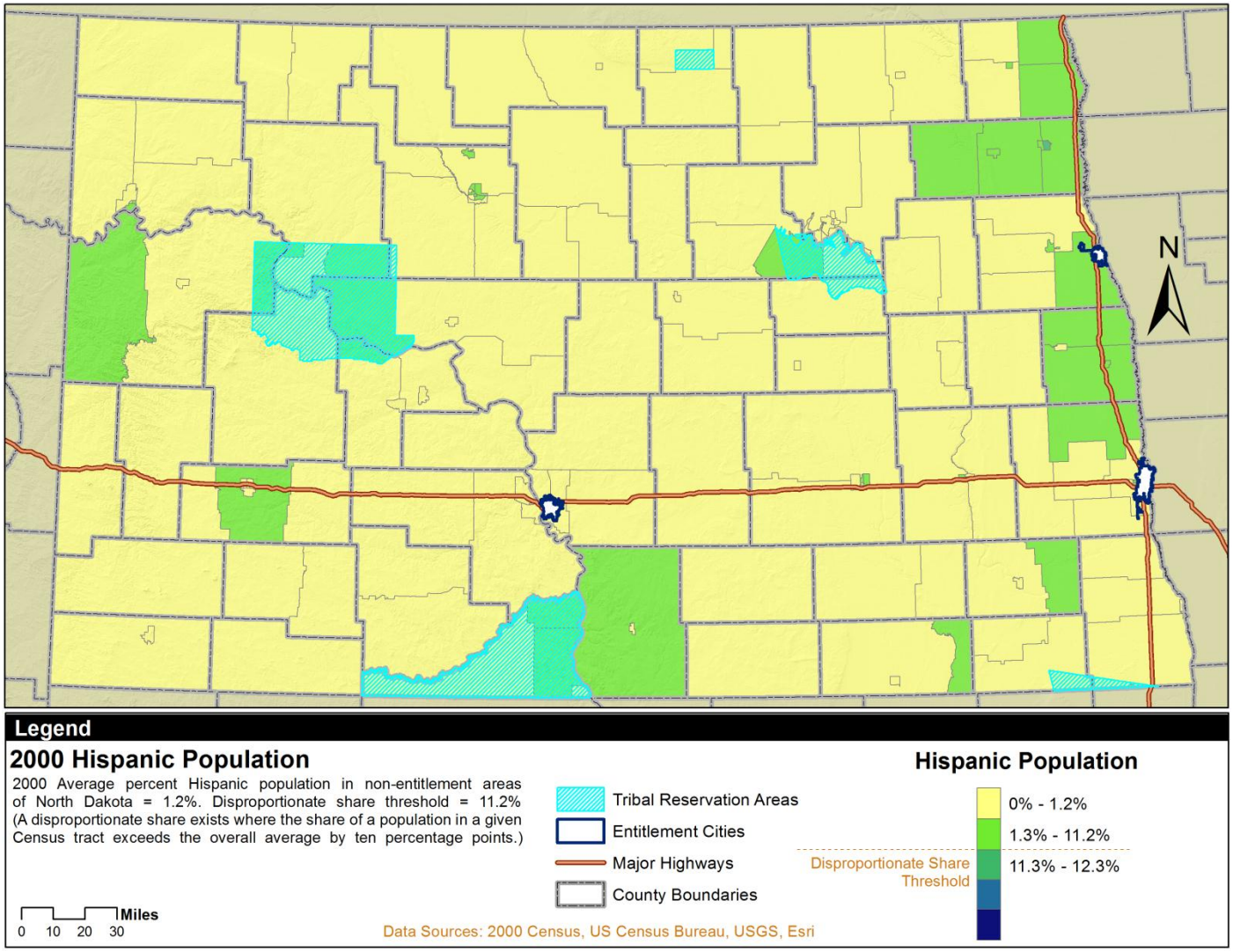
Map III.4
2010 Black Population
Non-entitlement areas of North Dakota
2010 Census Data



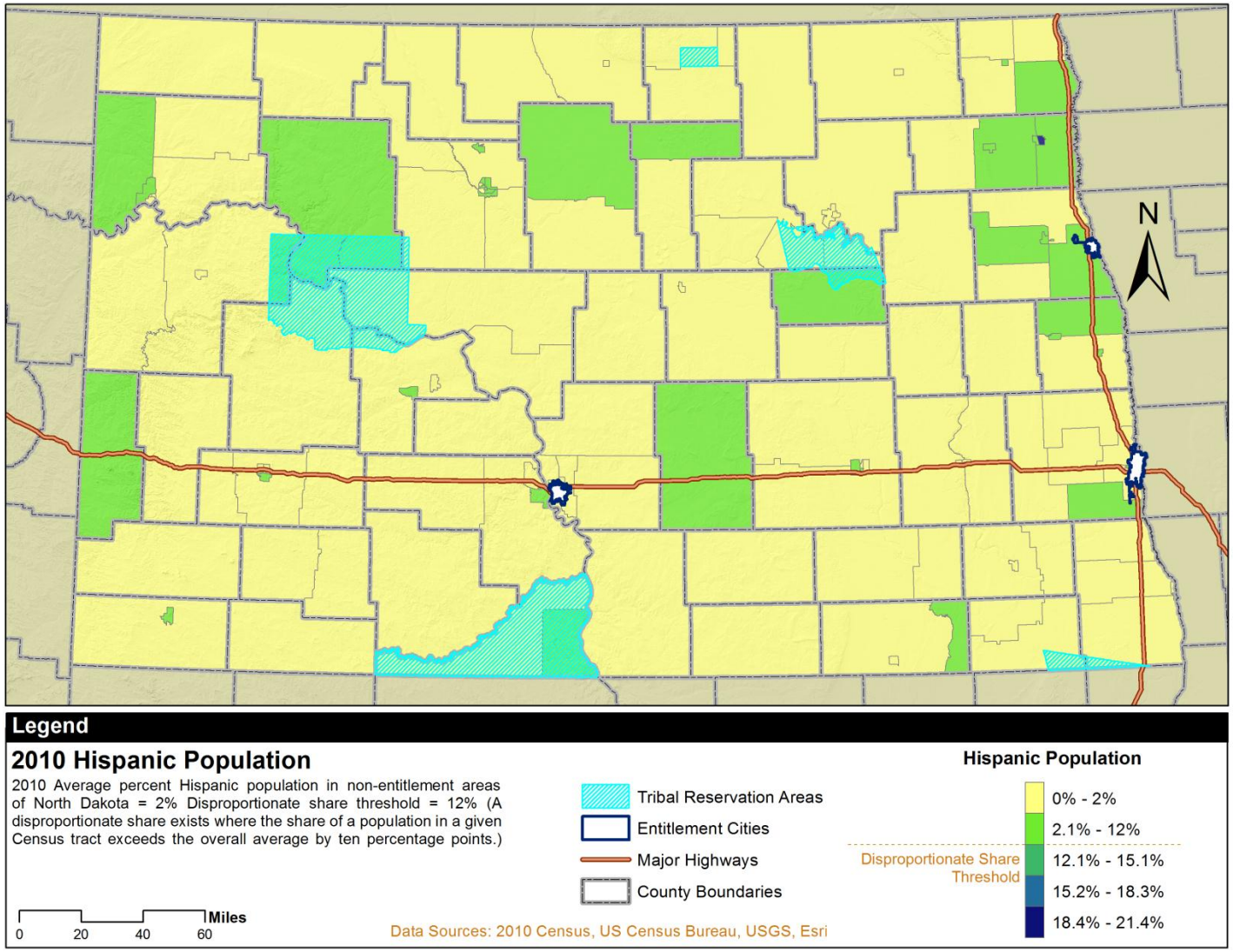
Hispanic populations in 2000 and 2010 are shown in Maps III.5 and III.6, on the following pages. In both years, there was no disproportionate share of Hispanic populations. There was some movement in areas with concentrations of Hispanic residents. These changes are shown in Maps III.5 and III.6 on the following pages.

Maps III.7 and III.8 show the shift in the American Indian populations in 2000 and 2010. Both maps illustrate the areas that had disproportionate shares of American Indian populations. All of these areas are in or adjacent to Tribal Reservation lands. This included Benson, Dunn, Montreal, Rolette, and Sioux counties.

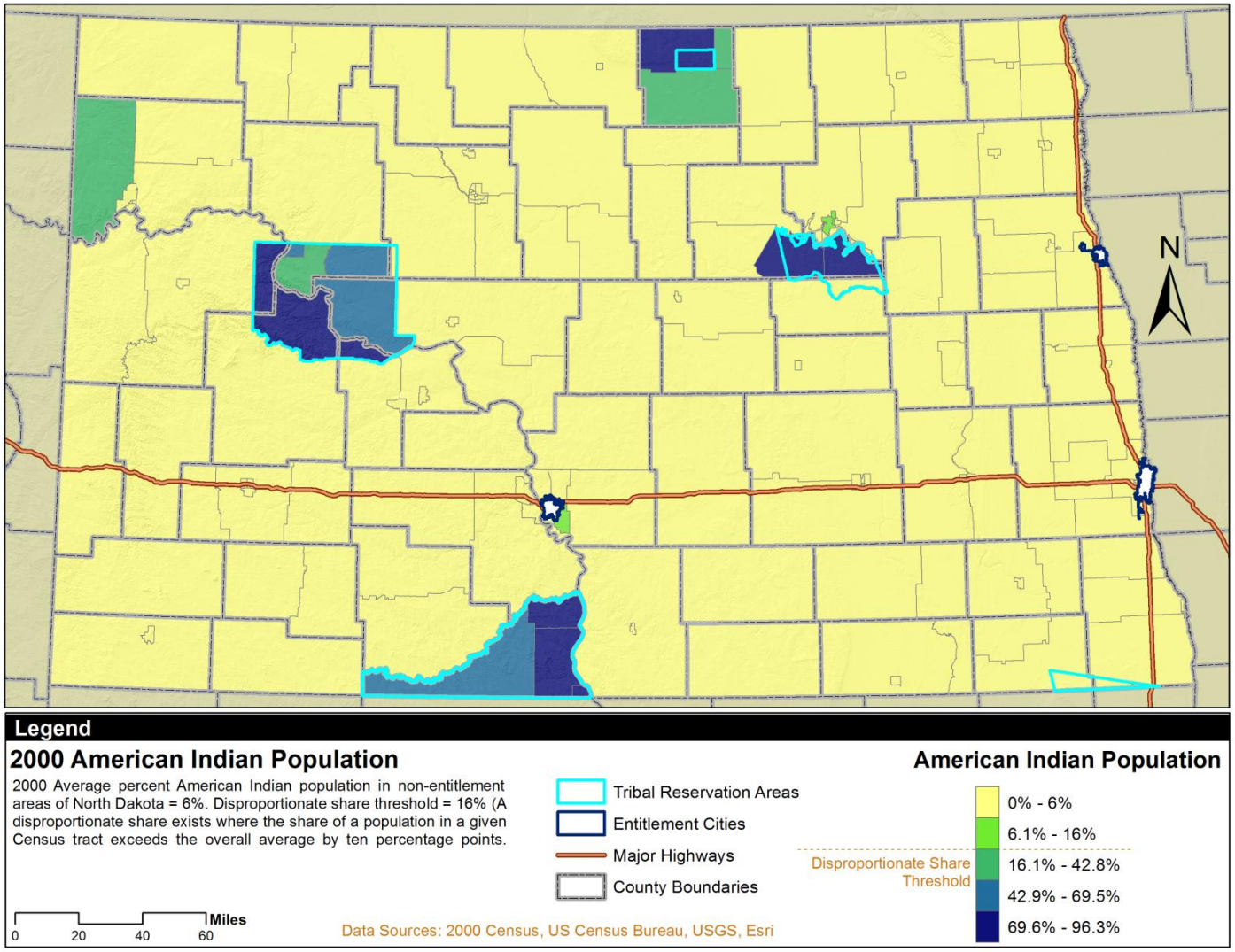
Map III.5
2000 Hispanic Population
Non-entitlement areas of North Dakota
Census Bureau 2000



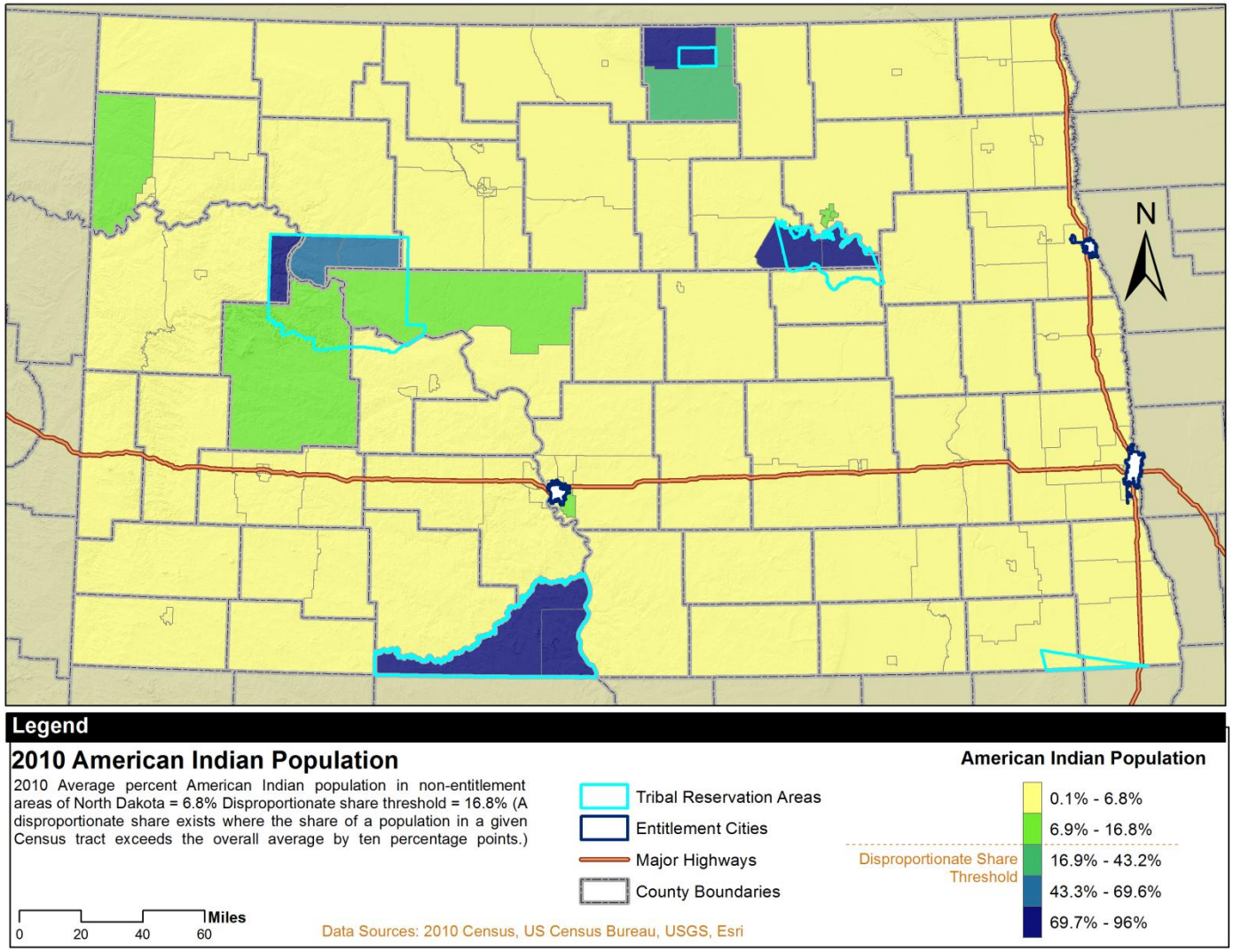
Map III.6
2010 Hispanic Population
Non-entitlement areas of North Dakota
Census Bureau 2010



Map III.7
2000 American Indian Population
Non-entitlement areas of North Dakota
Census Bureau 2000



Map III.8
2010 American Indian Population
Non-entitlement areas of North Dakota
Census Bureau 2010



POPULATION BY AGE

The non-entitlement areas of North Dakota experienced a shift in the population between 2000 and 2010 as growth in the number of older residents generally outpaced growth in the number of younger residents as seen in Table III.4, below. The fastest-growing age cohort during this time period was composed of residents between the ages of 55 and 64; this cohort grew by 46.8 percent between 2000 and 2010. Other age cohorts with faster than average growth included those aged 20 to 24 and those aged 25 to 34, growing at a rate of 15.8 and 14.5 percent, respectively. By contrast, age cohorts from 5 to 19, those aged 35 to 54, and aged 65 and older declined.

Table III.4
Population by Age
Non-Entitlement Areas of North Dakota
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Under 5	27,371	6.1%	30,677	6.8%	12.1%
5 to 19	104,497	23.4%	88,322	19.5%	-15.5%
20 to 24	24,472	5.5%	28,333	6.3%	15.8%
25 to 34	47,423	10.6%	54,318	12.0%	14.5%
35 to 54	130,149	29.1%	120,588	26.6%	-7.3%
55 to 64	39,956	8.9%	58,657	13.0%	46.8%
65 or Older	72,880	16.3%	72,037	15.9%	-1.2%
Total	**446,748**	**100.0%**	**452,932**	**100.0%**	**1.4%**

The Elderly

The elderly population is defined by the Census Bureau as comprising any person aged 65 or older. As noted in the 2000 Census data, 72,880 persons in non-entitlement areas of North Dakota were considered elderly; by 2010 there were 72,037 elderly persons. Table III.5, below, segregates this age cohort into several smaller groups. This table shows that those aged 70 to 74 comprised the largest age cohort of the elderly population in North Dakota in 2010 at 15,621 persons, followed by those aged 75 to 79 with 13,568 persons. Between 2000 and 2010, the most growth occurred in those aged 65 to 66 with a 16.3 percent increase, followed by those aged 85 and older, with a 6.7 percent increase. The elderly population, as a whole, saw a 1.2 percent decline between 2000 and 2010. The fastest declining group during that timeframe was persons aged 70 to 74, with a 10.8 percent decrease over the decade.

Table III.5
Elderly Population by Age
Non-Entitlement Areas of North Dakota
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	7,147	9.8%	8,315	11.5%	16.3%
67 to 69	10,500	14.4%	10,939	15.2%	4.2%
70 to 74	17,517	24.0%	15,621	21.7%	-10.8%
75 to 79	14,735	20.2%	13,568	18.8%	-7.9%
80 to 84	11,546	15.8%	11,390	15.8%	-1.4%
85 or Older	11,435	15.7%	12,204	16.9%	6.7%
Total	**72,880**	**100.0%**	**72,037**	**100.0%**	**-1.2%**

The Frail Elderly

The elderly population also includes those who are considered to be frail elderly, defined as elderly persons whose physiological circumstances may limit functional capabilities; this is often quantified as those who are 85 years of age and older. Table III.6 shows that there were 12,204 persons aged 85 or older in North Dakota at the time of the 2010 Census.

AGE BY REGION

Each region throughout North Dakota experienced changes in age cohorts at different rates. Tables pertaining to age by region are included in the Technical Appendix. Region 1 saw the greatest growth in those aged 20 to 24 and those aged 25 to 34, with a growth rate of 64.8 and 68.1 percent, respectively. This region also saw a decline in those aged 5 to 19, those aged 35 to 64, and those 65 or older. Region 2 experienced a similar shift, with the same age cohorts declining between 2000 and 2010.

Region 3 saw the greatest growth in those aged 55 to 64, with a 31.1 percent increase. This region also saw, however, a decline in the same age groups as Regions 1 and 2. Region 4's population declined as a whole between 2000 and 2010, and all age groups except those aged 55 to 64 declined. Those aged 55 to 64 grew by 41.4 percent during that decade.

In Region 5, the greatest growth was seen in those aged 55 to 64, with a 66.4 percent increase. Age cohorts between 5 and 19, 35 and 54, and over 65 all grew at a rate lower than the regional average. The population in Region 6 declined over the course of the decade, with the largest decrease in those aged 5 to 19. The only age group that saw a growth during this time period were those aged 55 to 64, which increased by 28.6 percent.

Region 7 experienced the greatest growth in those aged 55 to 64, with a 63.2 percent increase. The population of persons aged 5 to 19 and 35 to 54 both declined during this time period. This was a similar trend to Region 8 that experienced a decline in both those age groups, as well as a 44.2 percent increase in persons aged 55 to 64.

PERSONS WITH DISABILITIES

Disability is defined by the Census Bureau as a lasting physical, mental or emotional condition that makes it difficult for a person to do activities, to go outside the home alone or to work. By this definition, some 69,743 North Dakotans in non-entitlement areas were considered to be living with some form of disability in 2000. This figure was lower than the national average for that time of about 19.3 percent.[1] As seen in Table III.6, there were 3,792 persons aged 5 to 15 with disabilities, 39,946 persons between the age of 16 and 64 with a disability and 26,005 persons over the age of 65 with a disability at that time.[2]

[1] 2000 Census SF3 Data, available from http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=DEC_00_SF3_QTP21&prodType=table

[2] The data on disability status was derived from answers to long-form questionnaire items 16 and 17 for the 1-in-6 sample. Item 16 asked about the existence of the following long-lasting conditions: (a) blindness, deafness, or a severe vision or hearing impairment, (sensory

Table III.6
Disability by Age
Non-Entitlement Areas of North Dakota
2000 Census SF3 Data

Age	Total	
	Disabled Population	Disability Rate
5 to 15	3,792	5.1%
16 to 64	39,946	15.1%
65 and older	26,005	38.6%
Total	**69,743**	**17.2%**

According to the American Community Survey, an estimated 10.7 percent of non-entitlement residents in North Dakota were living with some form of disability by 2013. Disability rates tended to be higher for male than for female residents, and higher for elderly residents than for younger residents. Close to half of residents over the age of 75 were observed to be living with a disability in 2013, and disability rates fell progressively in lower age ranges.

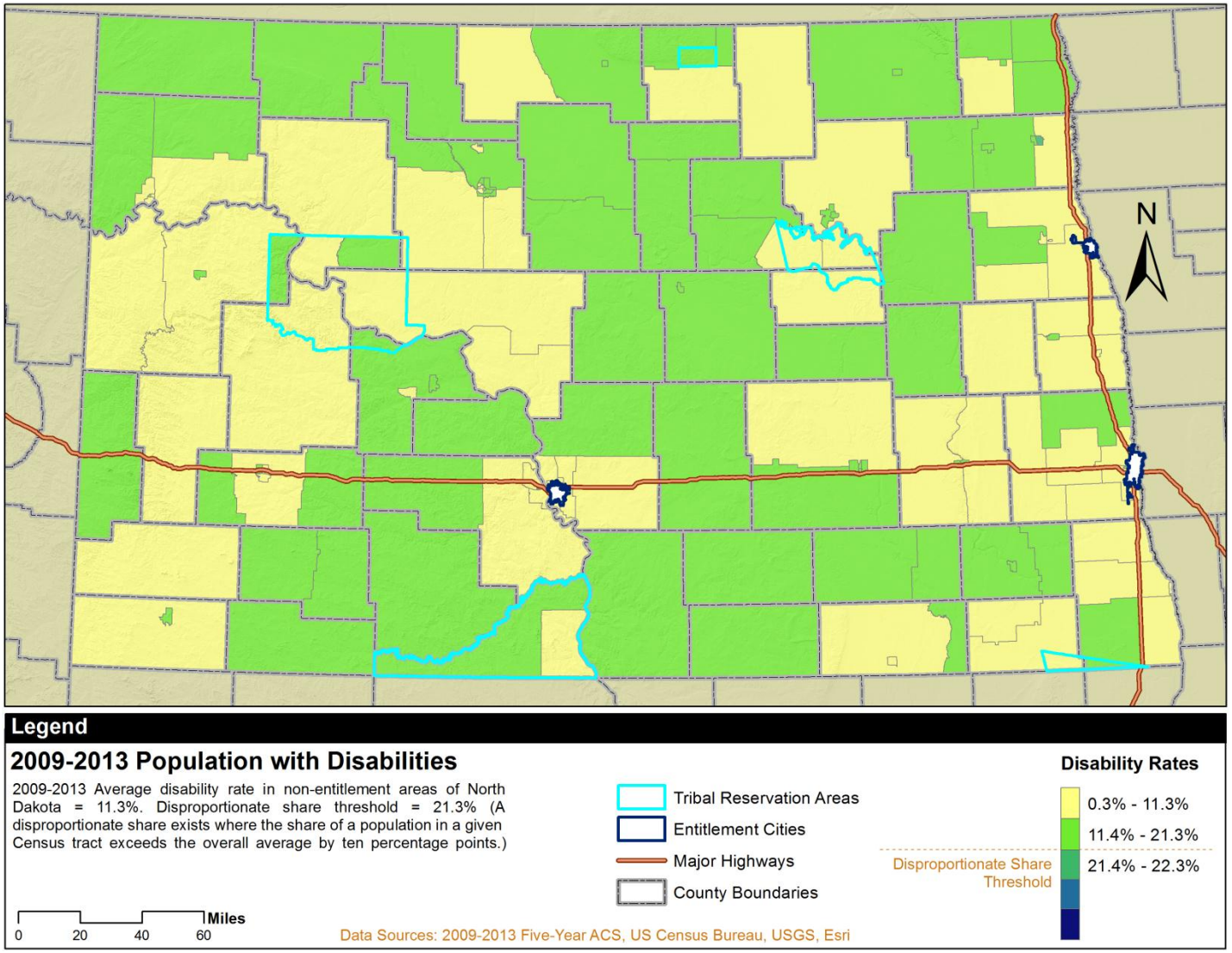
Table III.7
Disability by Age
Non-Entitlement Areas of North Dakota
2013 Five-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	119	0.7%	118	0.8%	237	0.8%
5 to 17	2,025	5.0%	1,031	2.8%	3,056	3.9%
18 to 34	2,385	4.8%	1,801	4.0%	4,186	4.4%
35 to 64	11,138	12.0%	8,314	9.5%	19,452	10.8%
65 to 74	4,972	28.3%	3,762	20.8%	8,734	24.5%
75 or Older	6,630	48.0%	8,718	46.6%	15,348	47.2%
Total	**27,269**	**11.8%**	**23,744**	**10.7%**	**51,013**	**11.3%**

Map III.9, on the following page, shows the distribution of persons with disabilities across the state. While there were areas with higher concentrations of persons with disabilities, there were no areas with a disproportionate share.

disability) and (b) a condition that substantially limits one or more basic physical activities such as walking, climbing stairs, reaching, lifting, or carrying (physical disability). Item 16 was asked of a sample of the population five years old and over. Item 17 asked if the individual had a physical, mental, or emotional condition lasting 6 months or more that made it difficult to perform certain activities. The four activity categories were: (a) learning, remembering, or concentrating (mental disability); (b) dressing, bathing, or getting around inside the home (self-care disability); (c) going outside the home alone to shop or visit a doctor's office (going outside the home disability); and (d) working at a job or business (employment disability). Categories 17a and 17b were asked of a sample of the population five years old and over; 17c and 17d were asked of a sample of the population 16 years old and over. For data products which use the items individually, the following terms are used: sensory disability for 16a, physical disability for 16b, mental disability for 17a, self-care disability for 17b, going outside the home disability for 17c, and employment disability for 17d. For data products which use a disability status indicator, individuals were classified as having a disability if any of the following three conditions was true: (1) they were five years old and over and had a response of "yes" to a sensory, physical, mental or self-care disability; (2) they were 16 years old and over and had a response of "yes" to going outside the home disability; or (3) they were 16 to 64 years old and had a response of "yes" to employment disability.

Map III.9
2013 Population with Disabilities
Non-entitlement areas of North Dakota
Census Bureau 2000



GROUP QUARTERS POPULATION

The Census Bureau defines group quarters as "places where people live or stay in a group living arrangement, which are owned or managed by an entity or organization providing housing and/or services for the residents[3]." The group quarters population is further divided into two overall categories:

- **The institutionalized population** includes persons under formally authorized supervised care or custody, such as those living in correctional institutions, nursing homes, juvenile institutions, halfway houses, mental or psychiatric hospitals, and wards.
- **The non-institutionalized population** includes persons who live in group quarters other than institutions, such as college dormitories, military quarters or group homes. These latter settings include community-based homes that provide care and supportive services, such as those with alcohol and drug addictions. This particular category also includes emergency and transitional shelters for the homeless.[4]

The number of residents living in group quarters in non-entitlement areas North Dakota grew slightly from 14,071 in 2000 to 14,563 in 2010, an increase of 3.5 percent. Noninstitutionalized group quarters saw an increase of 9.1 percent, while institutionalized groups quarters saw a 2.2 percent decline. The groups that drove the overall increase included college dormitories, correctional institutions, and other noninstitutionalized.

Table III.8
Group Quarters Population
Non-Entitlement Areas of North Dakota
2000 & 2010 Census SF1 Data

Group Quarters Type	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
Institutionalized					
Correctional Institutions	571	8.2%	1,359	19.9%	138.0%
Juvenile Facilities	.	.	211	3.1%	.
Nursing Homes	5,548	79.6%	4,936	72.4%	-11.0%
Other Institutions	852	12.2%	309	4.5%	-63.7%
Total	6,971	100.0%	**6,815**	100.0%	-2.2%
Noninstitutionalized					
College Dormitories	4,184	58.9%	3,967	51.2%	-5.2%
Military Quarters	1,244	17.5%	1,380	17.8%	10.9%
Other Noninstitutional	1,672	23.5%	2,401	31.0%	43.6%
Total	**7,100**	**50.5%**	**7,748**	**53.2%**	**9.1%**
Group Quarters Population	**14,071**	**100.0%**	**14,563**	**100.0%**	**3.5%**

[3] *2010 Census Summary File: Technical Documentation*. Issued September 2012. Page B-14. Available at http://www.census.gov/prod/cen2010/doc/sf1.pdf#page=504.

[4] Caution is needed in interpreting the "Other Noninstitutional" population to represent the actual homeless population of North Dakota, as this count likely under-represents the actual number of persons experiencing homelessness in the state. A more recent local count of this population is covered in a latter section of this document.

HOUSEHOLDS

North Dakota households in non-entitlement areas grew smaller, in general, between 2000 and 2010. The number of households grew by 5.6 percent overall between 2000 and 2010, but the number of households between three and six members fell behind that overall growth rate, and occupied smaller percentages of all North Dakota households at the end of the decade. By contrast, the number of one-person households grew at a rate of 11.8 percent and the number of two-person households grew by 13.0 percent. As a result, households with one or two members came to occupy 29.3 and 37.3 percent of all households, respectively, by the end of the decade. Additionally, the number of households with seven persons or more grew by 12.7 percent, and the proportion of all households that were occupied by seven or more members grew to account for 1.0 percent of households.

Table III.9
Households by Household Size
Non-Entitlement Areas of North Dakota
2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00–10
	Households	% of Total	Households	% of Total	
One Person	48,458	27.7%	54,196	29.3%	11.8%
Two Persons	61,054	34.9%	68,987	37.3%	13.0%
Three Persons	24,975	14.3%	24,967	13.5%	0.0%
Four Persons	23,610	13.5%	20,996	11.4%	-11.1%
Five Persons	11,628	6.6%	10,319	5.6%	-11.3%
Six Persons	3,637	2.1%	3,543	1.9%	-2.6%
Seven Persons or More	1,660	.9%	1,870	1.0%	12.7%
Total	**175,022**	**100.0%**	**184,878**	**100.0%**	**5.6%**

C. ECONOMIC CONDITIONS

LABOR FORCE AND EMPLOYMENT

The size of the labor force, which represents the number of residents either working or looking for work, and the number of workers employed in non-entitlement areas of North Dakota have both grown considerably for more than two decades. Although the state did experience a slight increase in unemployment in 2009, it has since continued to fall. As seen in Table III.10, on the following page, the labor force had increased to 272,419 persons in 2013 and employment had reached 364,389.

Table III.10
Labor Force Statistics
Non-Entitlement Areas of North Dakota
1990–2013 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate
1990	220,624	211,290	9,334	4.20%
1991	217,835	207,554	10,281	4.70%
1992	217,191	205,595	11,596	5.30%
1993	218,210	207,304	10,906	5.00%
1994	232,019	222,430	9,589	4.10%
1995	230,961	222,378	8,583	3.70%
1996	231,728	223,286	8,442	3.60%
1997	230,385	222,949	7,436	3.20%
1998	230,196	222,116	8,080	3.50%
1999	230,785	222,059	8,726	3.80%
2000	228,025	220,627	7,398	3.20%
2001	226,746	219,790	6,956	3.10%
2002	226,454	217,706	8,748	3.90%
2003	227,608	218,640	8,968	3.90%
2004	227,607	218,876	8,731	3.80%
2005	232,509	223,831	8,678	3.70%
2006	235,665	227,457	8,208	3.50%
2007	237,648	229,658	7,990	3.40%
2008	241,480	233,439	8,041	3.30%
2009	243,930	233,588	10,342	4.20%
2010	247,014	237,356	9,658	3.90%
2011	255,250	246,380	8,870	3.50%
2012	267,101	259,136	7,965	3.00%
2013	272,419	264,389	8,030	2.90%

Prior to 2008, unemployment in North Dakota had remained fairly steady and since 1990, as seen in Diagram III.1, on the following page. The unemployment rate in North Dakota has remained below the national level, even more significantly since 2009. The unemployment rate in the non-entitlement areas of North Dakota was not hit significantly by the recent recession, and had hit 2.9 percent in 2013.

Diagram III.1
Unemployment Rate
Non-Entitlement Areas of North Dakota
1990–2013 BLS Data

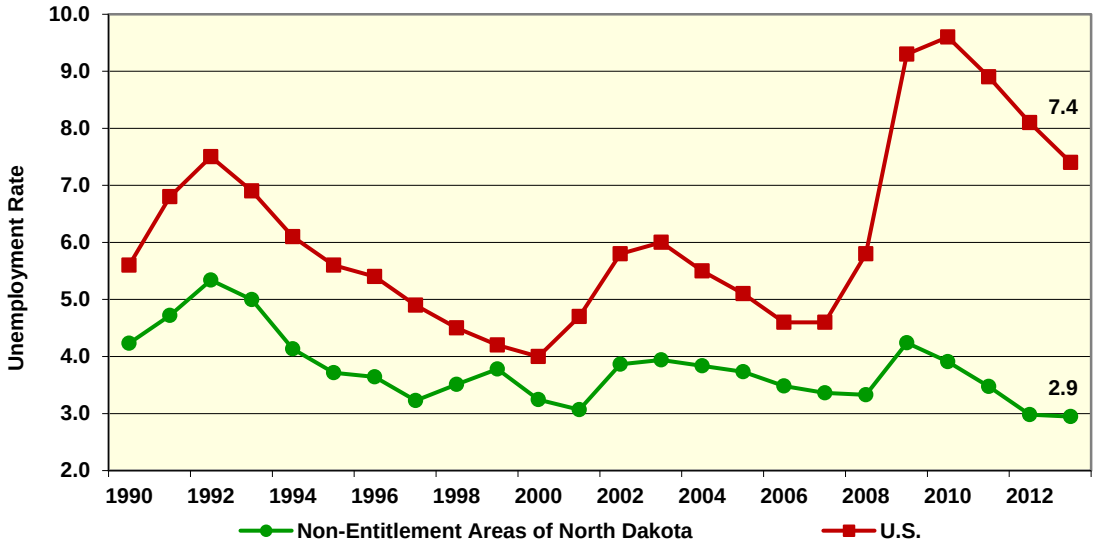
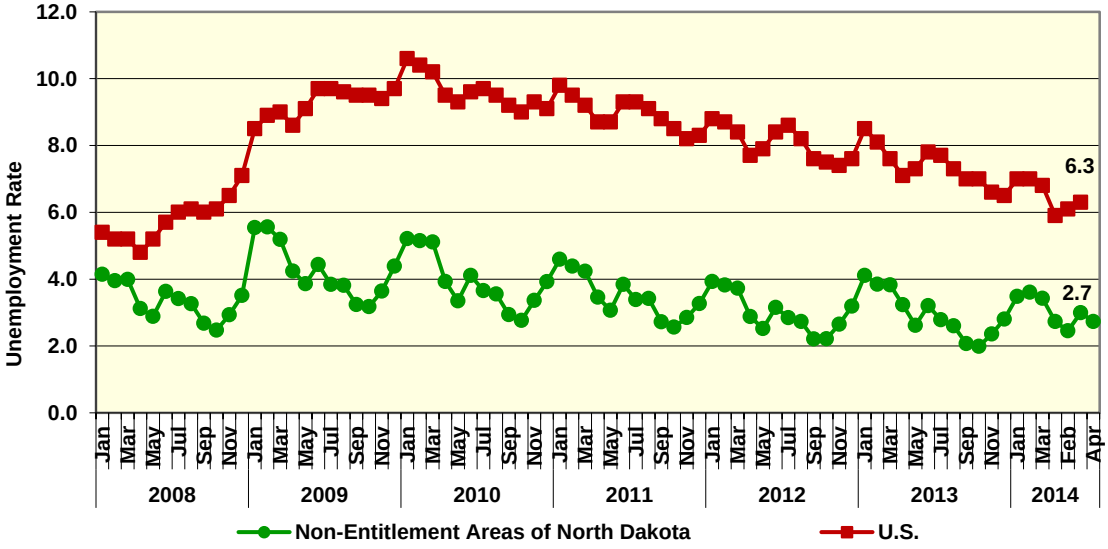


Diagram III.2, below, shows the state unemployment rate since 2008. The state's rate reached above 4 percent in 2009 and 2010, but remained mainly below that since 2011.

Diagram III.2
Monthly Unemployment Rate
Non-Entitlement Areas of North Dakota
2008–April 2014 BLS Data

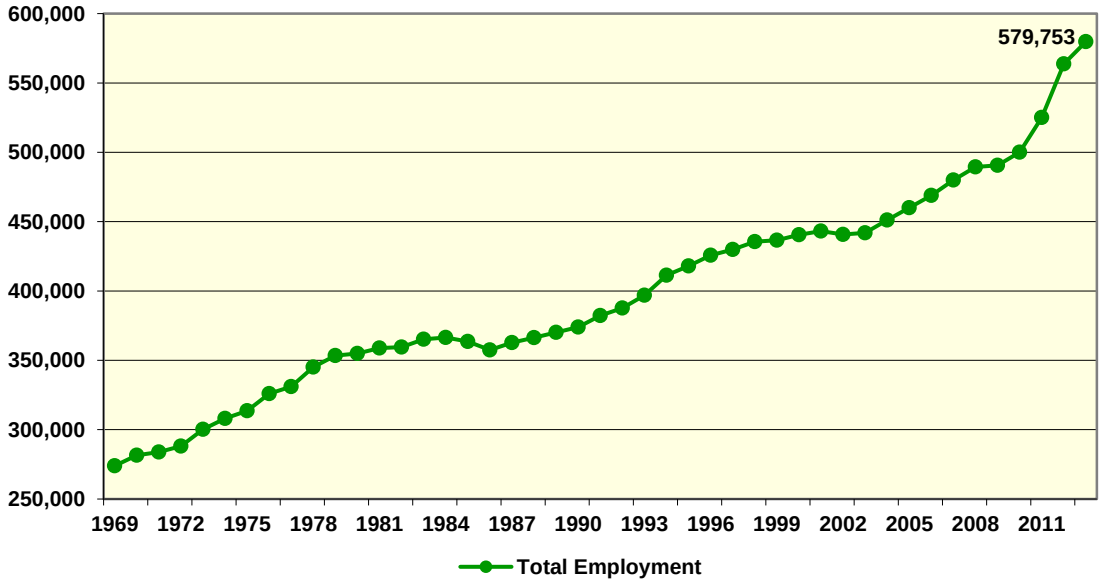


Full and Part-Time Employment

The Bureau of Economic Analysis (BEA) provides an alternate index of employment; a count of full-time and part-time jobs in the state. These data differ from the BLS data discussed previously in that they are collected where workers are employed rather than at the household level, and the same person may be counted twice in this dataset if he or she works more than one job.

The count of jobs in the state and the count of labor force participants both yield a similar portrait; of steady growth in the labor market until 2008. In fact, the BEA data indicate that this growth has been steady since 1969, and that growth in the number of jobs was uniformly positive for nearly four decades. In 1969, there were around 275,000 jobs in the state. By 2008, that number had grown to almost 500,000. Since that time, full and part time employment has increased at a faster rate, reaching 579,753 by 2013.

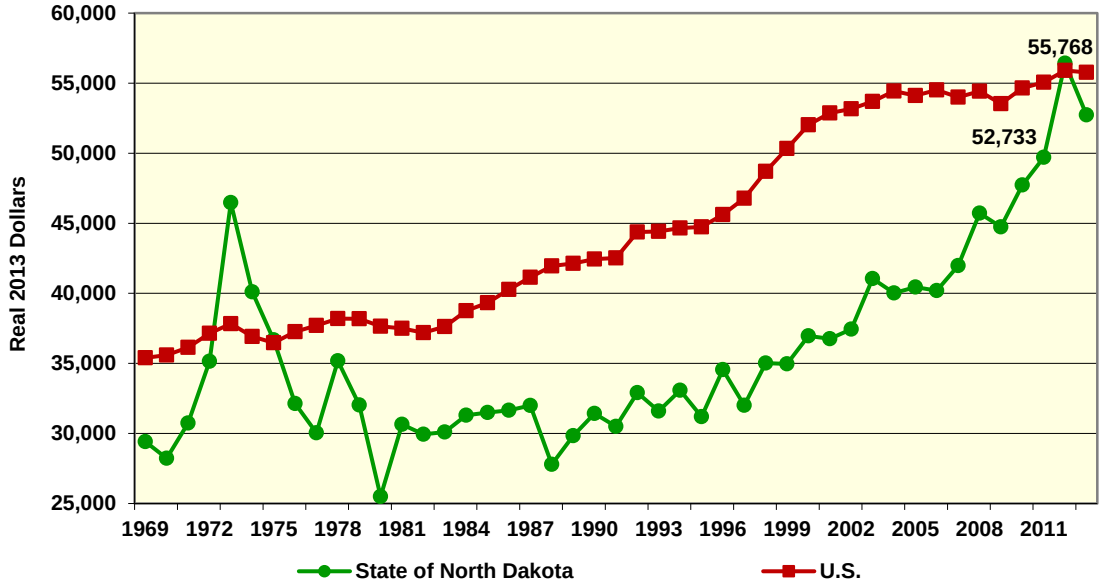
Diagram III.3
Full- and Part-Time Employment
State of North Dakota
1969–2013 BEA Data



Earnings and Personal Income

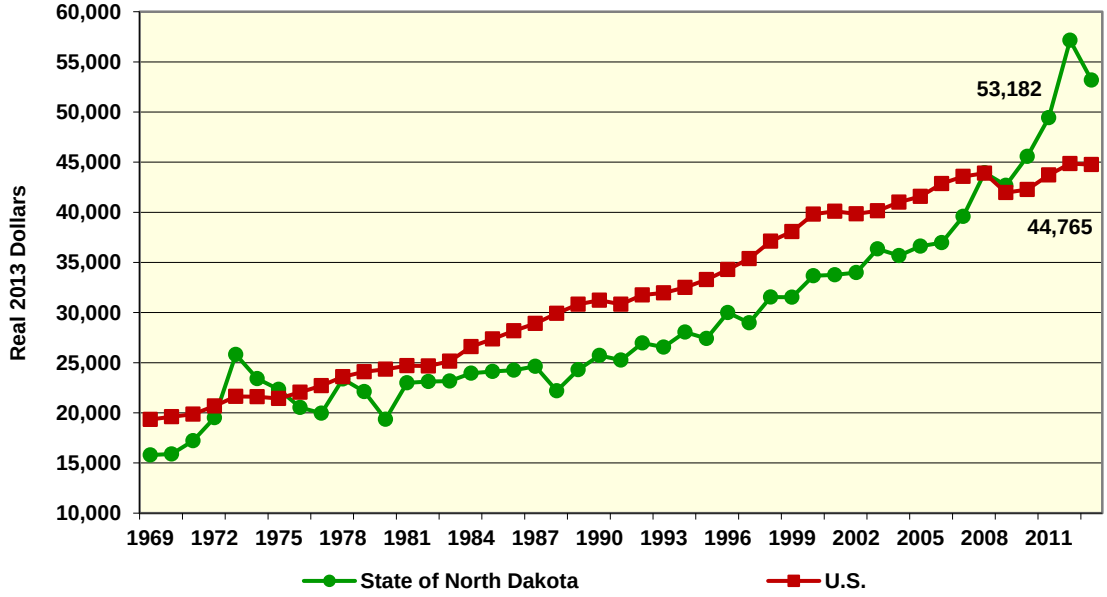
Real average earnings per job is defined as the total earnings from all jobs statewide divided by the total number of jobs in the state, adjusted for inflation. National growth in these earnings, which had been uniformly positive since 1969, leveled off in 2002, while strong growth in earnings in North Dakota largely continues. Nevertheless, the state of North Dakota's average earnings remained consistently below the national rate until 2011. At this point the state intersected the national rate, then proceeded to drop below again, although with much less of a gap than in previous years. The Real Average Earnings per Job in North Dakota was $52, 733 in 2102, compared to $55,768 nationally.

Diagram III.4
Real Average Earnings Per Job
State of North Dakota
1969–2013 BEA Data, 2013 Dollars



Growth in real per capita income (PCI) is defined as the total personal income from all sources divided by the number of residents in the state. North Dakota's statewide real per capita income has remained below national levels since 1969 until 2008. The state's real per capita income grew to $53,182in 2013, while the national level was $44,765.

Diagram III.5
Real Per Capita Income
State of North Dakota
1969–2013 BEA Data, 2013 Dollars



Distribution of Income

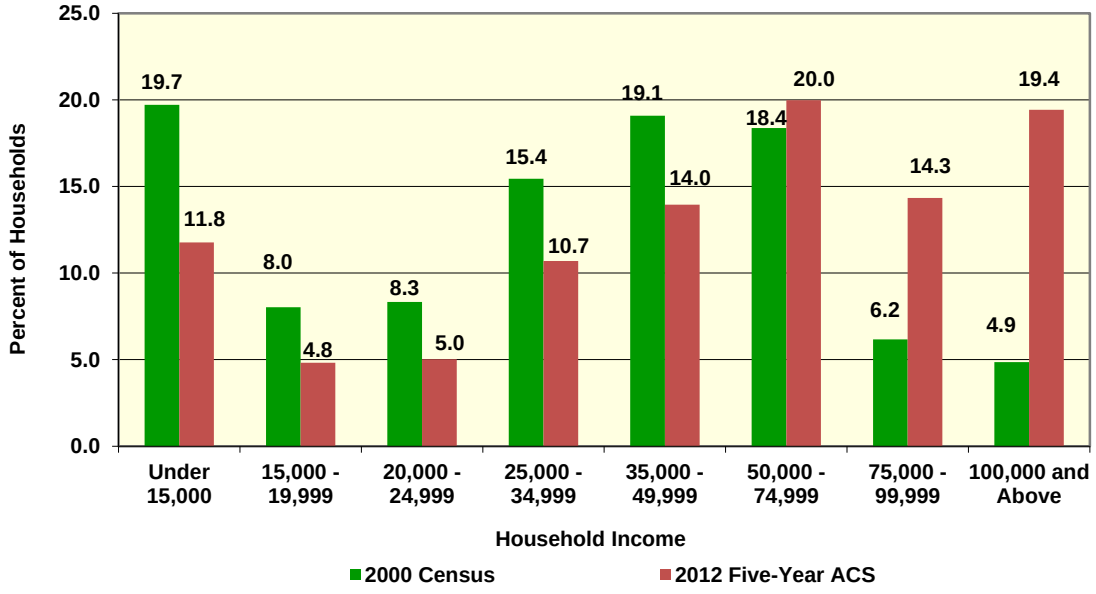
The income bracket with the most growth between 2000 and 2013 in non-entitlement areas of North Dakota were those with an income above $100,000. The proportion of households with incomes above $100,000 grew by 16.5 percentage points. The proportion of households with an income between $75,000 and $99,999 grew by 8.9 percentage points. Households with income between $50,000 and $74,999 grew by 1.1 percentage points. The proportion of households in all other income groups declined between 2000 and 2012. Households with income between $50,000 and $74,999 and households making more than $100,000 comprised the largest portion of households, at 19.5 percent and 21.4 percent, respectively.

Table III.11
Households by Income
Non-Entitlement Areas of North Dakota
2000 Census SF3 & 2013 Five-Year ACS Data

Income	2000 Census		2013 Five-Year ACS	
	Households	% of Total	Households	% of Total
Less than $15,000	34,507	19.7%	20,620	10.9%
$15,000 to $19,999	14,047	8.0%	8,664	4.6%
$20,000 to $24,999	14,583	8.3%	9,069	4.8%
$25,000 to $34,999	27,043	15.4%	19,546	10.3%
$35,000 to $49,999	33,411	19.1%	25,315	13.4%
$50,000 to $74,999	32,166	18.4%	36,913	19.5%
$75,000 to $99,999	10,798	6.2%	28,541	15.1%
$100,000 or More	8,504	4.9%	40,368	21.4%
Total	**175,059**	**100.0%**	**189,036**	**100.0%**

Diagram III.7 illustrates the change in household incomes between 2000 and 2012.

Diagram III.7
Households by Income
State of North Dakota
2000 Census SF3 & 2012 Five-Year ACS Data



POVERTY

The Census Bureau uses a set of income thresholds that vary by family size and composition to determine poverty status. If a family's total income is less than the threshold for that size family, then that family, and every individual in it, is considered poor. The poverty thresholds do not vary geographically, but they are updated annually for inflation using the Consumer Price Index. The official poverty definition counts monetary income earned before taxes and does not include capital gains and non-cash benefits such as public housing, Medicaid and food stamps. Poverty is not defined for people in military barracks, institutional group quarters or for unrelated individuals under the age of 15, such as foster children. These people are excluded from the poverty calculations, as they are considered as neither poor nor non-poor.[5]

In North Dakota non-entitlement areas, the poverty rate in 2000 was 12.0 percent, with 52,028 persons living in poverty. There were an estimated 5,772 children under the age of 5 living in poverty in 2000, and another 11,462 children between the ages of 6 and 17 living in poverty. By 2013, there were 5,937 children under 6 living in poverty, and 9,025 children aged 6 to 17. Additionally, in 2012, some 8,039 of the state's citizens 65 year of age or older were also considered to be living in poverty. These data are presented in Table III.12.

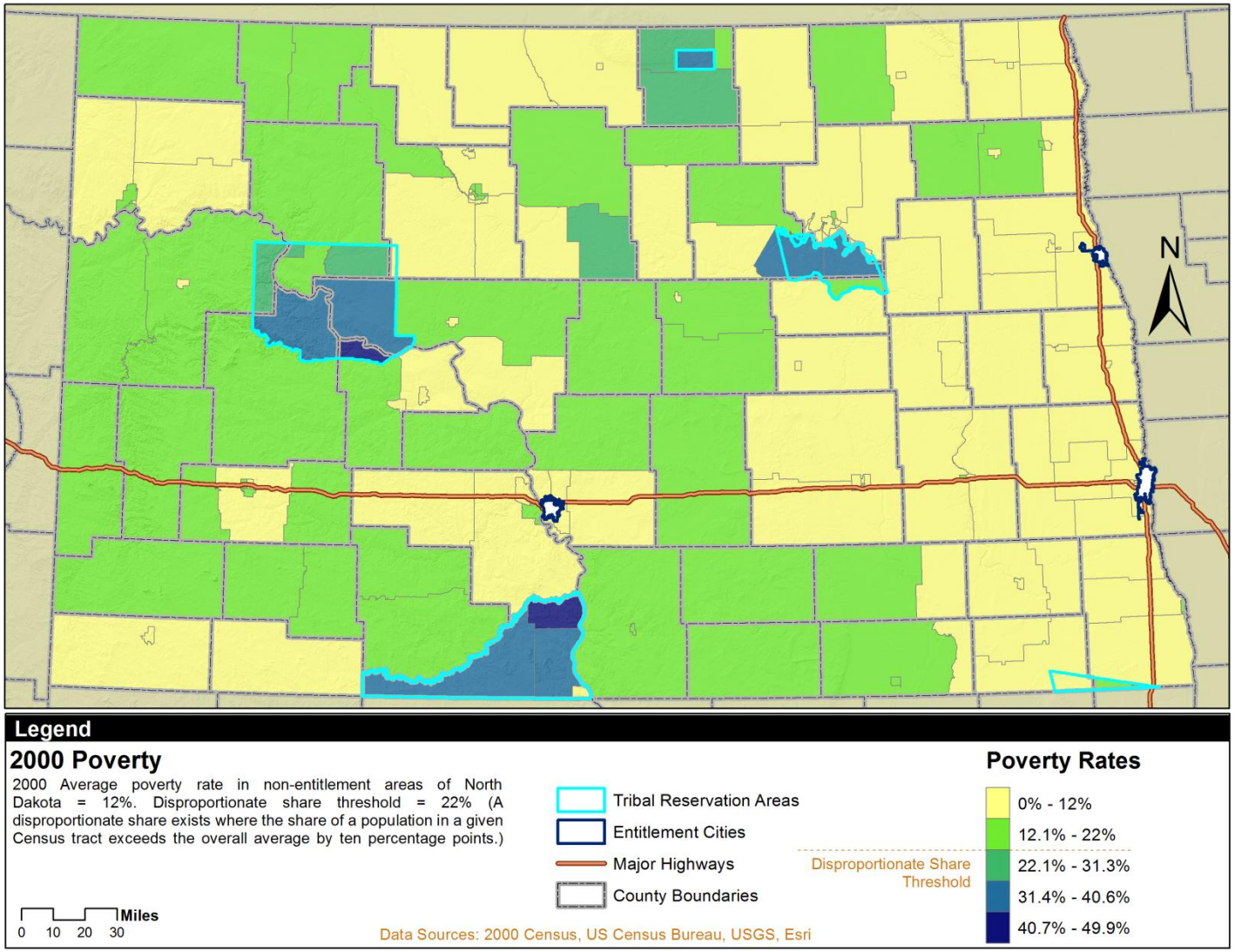
Table III.12
Poverty by Age
Non-Entitlement Areas of North Dakota
2000 Census SF3 & 2013 Five-Year ACS Data

Age	2000 Census		2013 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	5,772	11.1%	5,937	12.6%
6 to 17	11,462	22.0%	9,025	19.1%
18 to 64	26,567	51.1%	24,224	51.3%
65 or Older	8,227	15.8%	8,039	17.0%
Total	**52,028**	**100.0%**	**47,225**	**100.0%**
Poverty Rate	**12.0%**	**.**	**10.5%**	**.**

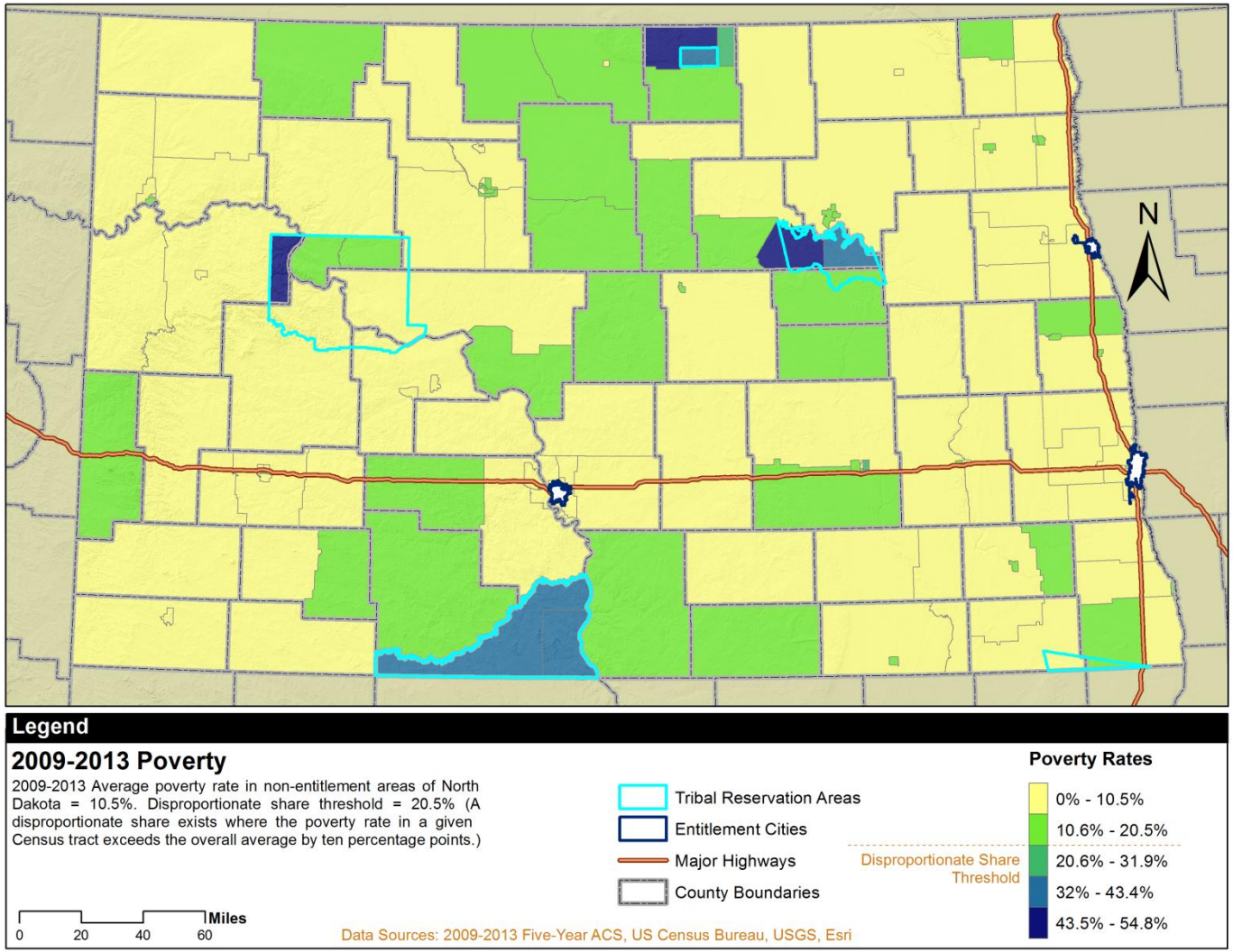
Maps III.10 and III.11 show the shift in areas with concentrations of poverty throughout the State. In 2000, census tracts with disproportionate share of poverty were found in Benson, Dunn, McKenzie, McLean, McHenry, Mercer, Mountrail, Rolette and Sioux Counties. Most of these areas were within or adjacent to Tribal Reservation areas. The areas with disproportionate share of poverty were similar in 2013, although the concentrations of poverty did shift during this time.

[5]http://www.census.gov/hhes/poverty/povdef.html.

Map III.10
2000 Poverty Rates
Non-entitlement areas of North Dakota
2000 Census Data



Map III.11
2013 Poverty Rates
Non-entitlement areas of North Dakota
2013 ACS Data



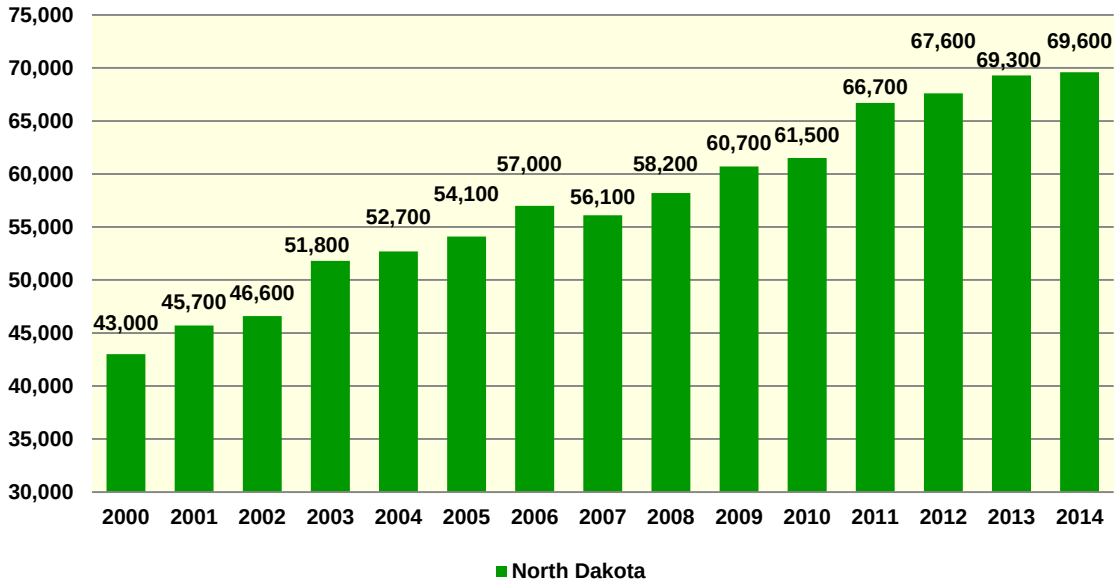
More recent poverty data for the State of North Dakota, extracted from the Census Bureau's Small Area Income and Poverty Estimates (SAIPE) program, are presented in Table III.13, at right. The poverty rate for the State as a whole has increased from 10.4 percent in 2000 to 11.2 percent in 2012. The poverty rate increased steadily from 2000 to 2010, ending with 81,176 persons in poverty in 2010. After this, the poverty rate has declined, resulting in 75,251 individuals in poverty in 2012. This is lower than the national poverty rate of 15.9 in 2012.

While the poverty rate continued to increase over the past decade, the median family income for the state of North Dakota as a whole increased from 2000 to 2014, from $43,000 to $69,600. This change is shown in Diagram III.8, below. The median family income has risen consistently throughout this time, with an increase of over $26,000 over the course of the past fourteen years.

Table III.13
Poverty Rate
State of North Dakota
Census Bureau SAIPE Poverty Estimates, 2000 - 2012

Year	Individuals in Poverty	Poverty Rate
2000	64,809	10.4
2001	70,488	11.4
2002	68,625	11.1
2003	65,063	10.5
2004	67,625	10.8
2005	70,588	11.6
2006	71,059	11.7
2007	72,242	11.8
2008	70,654	11.5
2009	72,911	11.7
2010	81,176	12.5
2011	79,124	12.0
2012	75,251	11.2

Diagram III.8
Median Family Income
State of North Dakota
HUD Data, 2000 – 2014



ANTI-POVERTY STRATEGY

In this section we are required to describe the state's goals, programs, and policies for reducing the number of poverty level families, and how the state's goals, programs, and policies for producing and preserving affordable housing will be coordinated with other programs and services for which the state is responsible, and the extent to which they will reduce the number of poverty level families, taking into consideration factors over which the state has control.

The primary tool at the state level for providing assistance to deal with poverty is the Community Services Block Grant (CSBG) program. This program provides funds to the state's seven Community Action Agencies to ameliorate the causes and conditions of poverty. The funds provide a range of services and activities to assist the needs of low-income individuals, including the homeless, migrants, and the elderly. In North Dakota the funds are used to reduce poverty, revitalize low-income communities, and empower low-income families and individuals to become self-sufficient. This program is located in the North Dakota Division of Community Services, which provides an opportunity for almost daily interaction and coordination with the CDBG, HOME, and ESG programs.

The Community Action Agencies also play a key role in providing housing opportunities, most of which are included in the state's affordable housing goals, through the implementation of the state's HOME program. Their low-income clientele, most of who live in poverty, are the primary beneficiaries of HOME funds for obtaining housing as owners or renters. Families are also provided assistance in weatherizing their homes through the Weatherization program, which is a program within the Division of Community Services, and is often used in conjunction with HOME and CDBG funds that are used for housing rehabilitation. As noted in the affordable housing goals, some Regional Councils are partnering with Community Action Agencies to deal with lead based paint issues, and these are targeted to assist extremely low-income households. Homeless people also benefit through the Community Action Agencies through enrollment in the state's Self-Sufficiency Program.

The primary focus for the use of CDBG funds in addressing poverty, besides an emphasis on rehabilitating homes owned and rented by extremely low-income households, will continue to be through the creation of jobs. This is consistent with the short-term non-housing objectives established within each region for providing funds for economic development projects. The ESG program provides emergency shelter for many persons and families living in poverty; and the Shelter Plus Care program provides these people with transitional and permanent housing opportunities through the Continuum of Care.

The institutional structure and programs, along with close coordination between implementing agencies, are all in place, and many families and individuals have benefited. However, there is no way to demonstrate or predict just how these programs and services will reduce the number of people living in poverty. Since the state's affordable housing goals, the goals of the ESG and CDBG community development programs, emphasize

targeting extremely low-income families, most of whom live in poverty, and because of the primary focus of the Community Services Block Grant program in providing services to people living in poverty, we believe that no additional goals are needed to specifically target poverty level families.

D. SUMMARY

Between 2000 and 2013, the population in non-entitlement areas of North Dakota increased by over 40,000 people, starting at 446,748 in 2000 to 487,769 by 2013. Over the course of these thirteen years, total population growth in these areas equaled 9.2 percent. In 2010, the majority of the population, 89.7 percent, was white, although this group declined since 2000. The second largest racial group in 2010 was persons classified as American Indian at 6.8 percent, followed by two or more races, Black, "other", Asian, and Native Hawaiian/Pacific Islander. As for ethnicity, persons of Hispanic descent comprised 2.0 percent of the population. Geographic analysis of racial and ethnic data showed that certain areas throughout the state have higher concentrations of racial or ethnic minorities, including areas with disproportionate share of American Indian households. The two fastest growing age group in non-entitlement areas of North Dakota were those aged 55 to 64, followed by those aged 20 to 24. Some 17.2 percent of the population aged 5 or older in non-entitlement areas of North Dakota had one or more disabilities at the time of the 2000 census.

From 1990 through 2013, the labor force in non-entitlement areas of North Dakota, defined as people either working or looking for work, rose from about 220,000 persons to 272,419 persons. Since the mid-1990s North Dakota's unemployment rate remained fairly steady with the national rate, although a couple percentage points lower. In 2010 when the nation unemployment rate spikes, unemployment in non-entitlement area of North Dakota continued to decline, reaching 2.9 percent in 2013. In 2013, the real average earning per job in the state of North Dakota was $52,733, and real per capita income was $44,765, but both of these figures were below national averages. In non-entitlement areas of North Dakota the poverty rate in 2013 was 10.5 percent with 47,225 persons living in poverty.

IV. Housing Market Analysis

A. Introduction

The following narrative provides information about the housing market, the supply and demand for housing over time, building permit data and related price information for both rental properties and homeownership opportunities in North Dakota.

B. Housing Stock

In 2000, the Census Bureau reported that North Dakota had 289,677 total housing units. Since that time, the Census Bureau has continued to release estimates of the total number of housing units in the state. The annual estimates of housing stock are presented in Table IV.1, at right. By 2013, there were estimated to be 339,313 housing units in North Dakota. Housing units were added at a rate around 1 percent for the first decade, but have increased during 2012 and 2013 to over 3 percent by 2013.

Table IV.1
Housing Units Estimates
State of North Dakota
Census Data, 2000 - 2013

Year	Housing Units
2000	289,677
2001	292,253
2002	294,571
2003	297,518
2004	300,804
2005	304,459
2006	307,767
2007	310,471
2008	313,209
2009	315,451
2010	317,498
2011	321,723
2012	329,106
2013	339,313

Type and Tenure

Single family homes accounted for 74.8 percent of the housing stock in North Dakota non-entitlement areas in 2013. The second largest unit type was apartments with 10.4 percent of units. These two groups grew slightly from 2000. The proportion of single family homes grew by less than one percentage points, while the proportion of apartments grew by 1.1 percentage points. The proportion of duplexes, tri- or four-plexes, mobile homes, and boats, RV, and vans, all fell slightly. These changes shifted the dynamics of the housing stock in non-entitlement areas of North Dakota, leaving single family homes with the vast majority of unit types.

Table IV.2
Housing Units by Type
Non-Entitlement Areas of North Dakota
2000 Census SF3 & 2013 Five-Year ACS Data

Unit Type	2000 Census		2013 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	150,480	74.0%	164,961	74.8%
Duplex	3,945	1.9%	3,692	1.7%
Tri- or Four-Plex	8,554	4.2%	8,022	3.6%
Apartment	18,885	9.3%	22,884	10.4%
Mobile Home	21,289	10.5%	20,918	9.5%
Boat, RV, Van, Etc.	255	0.1%	115	0.1%
Total	**203,408**	**100.0%**	**220,592**	**100.0%**

Almost 12,000 housing units were added to the non-entitlement areas of North Dakota housing market between the 2000 and 2010 Censuses, as seen in Table IV.3, below. The

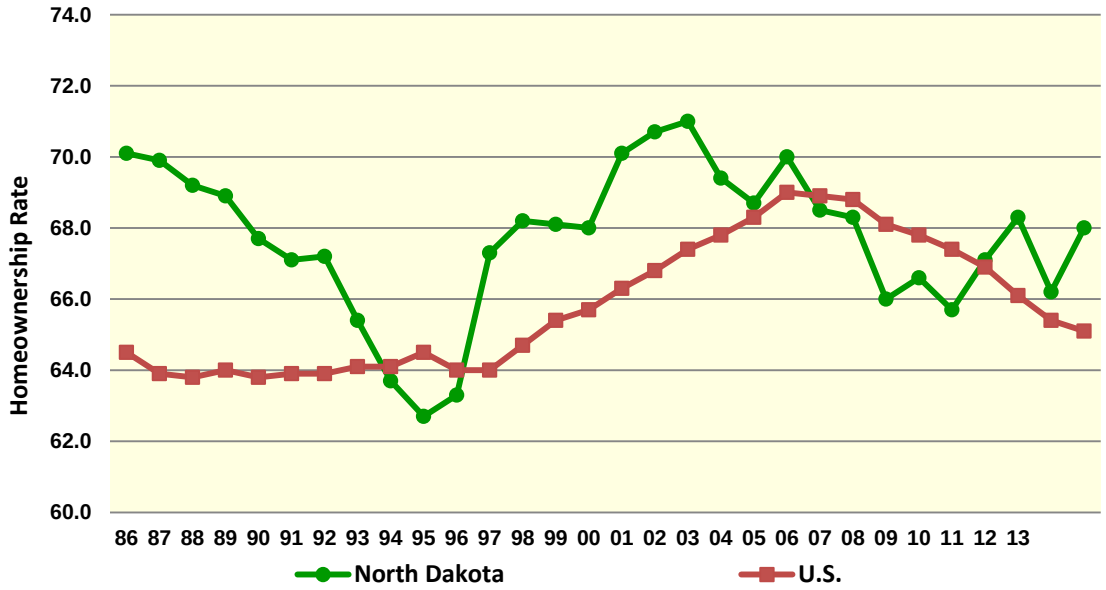
greatest increase was in vacant units, increasing by 7.6 percent. Owner-occupied units and renter-occupied units increased by 5.3 and 6.6 percent, respectively.

Table IV.3
Housing Units by Tenure
Non-Entitlement Areas of North Dakota
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	175,022	86.0%	184,878	85.8%	5.6%
Owner-Occupied	128,130	73.2%	134,869	73.0%	5.3%
Renter-Occupied	46,892	26.8%	50,009	27.0%	6.6%
Vacant Housing Units	28,400	14.0%	30,567	14.2%	7.6%
Total Housing Units	**203,422**	**100.0%**	**215,445**	**100.0%**	**5.91%**

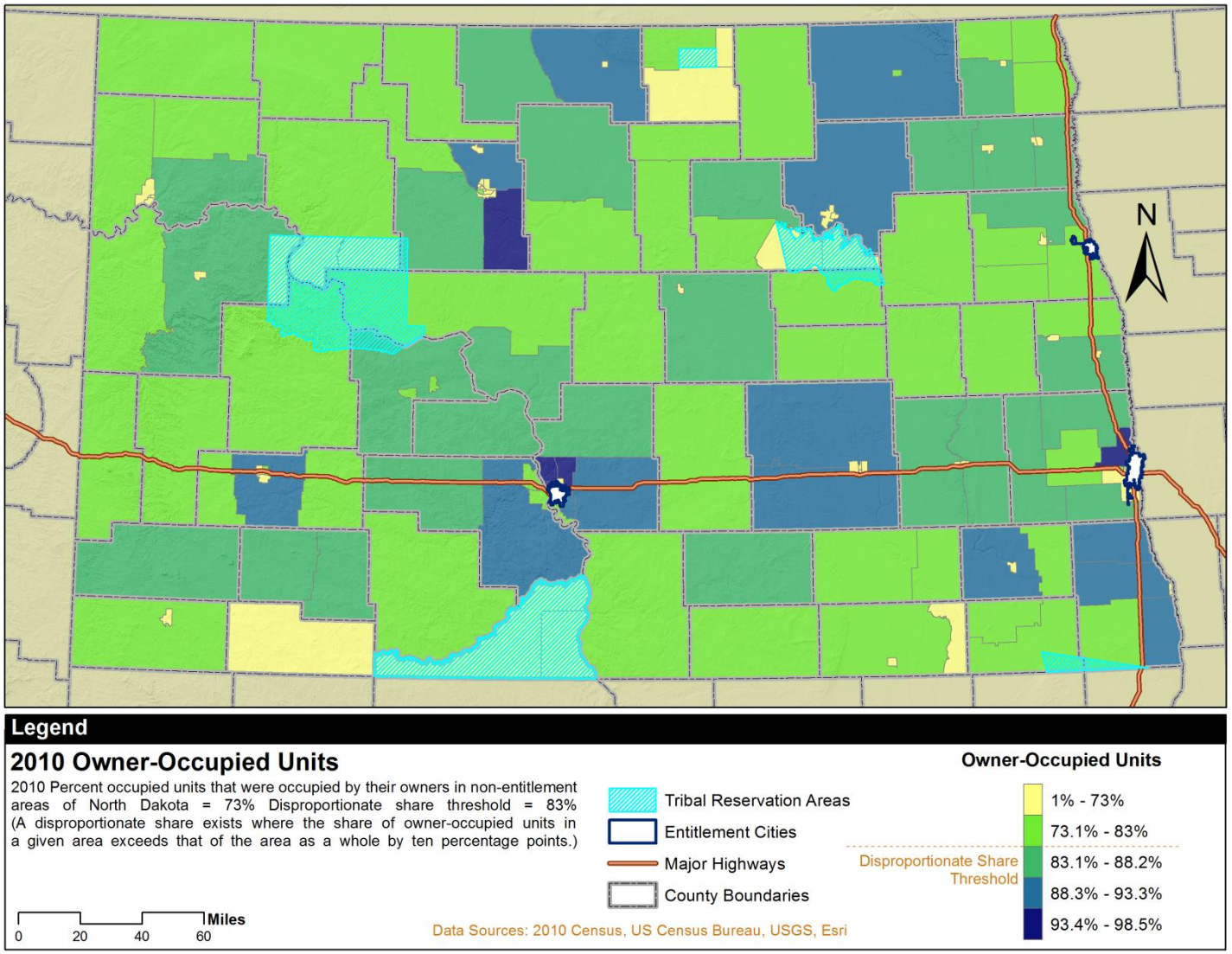
The Census Bureau estimates homeownership rates annually. These data on homeownership rates are presented in Diagram IV.1, below. This diagram compares homeownership rates for the state of North Dakota and the U.S. from 1986 through 2014 and shows that North Dakota had consistently higher homeownership rates, except for two periods in the mid-90s and between 2006 and 2012. Homeownership rates declined from close to 71 percent in 2003 to around 68 percent in 2014.

Diagram IV.1
Homeownership Rates
State of North Dakota
Census Data, 1984 - 2014

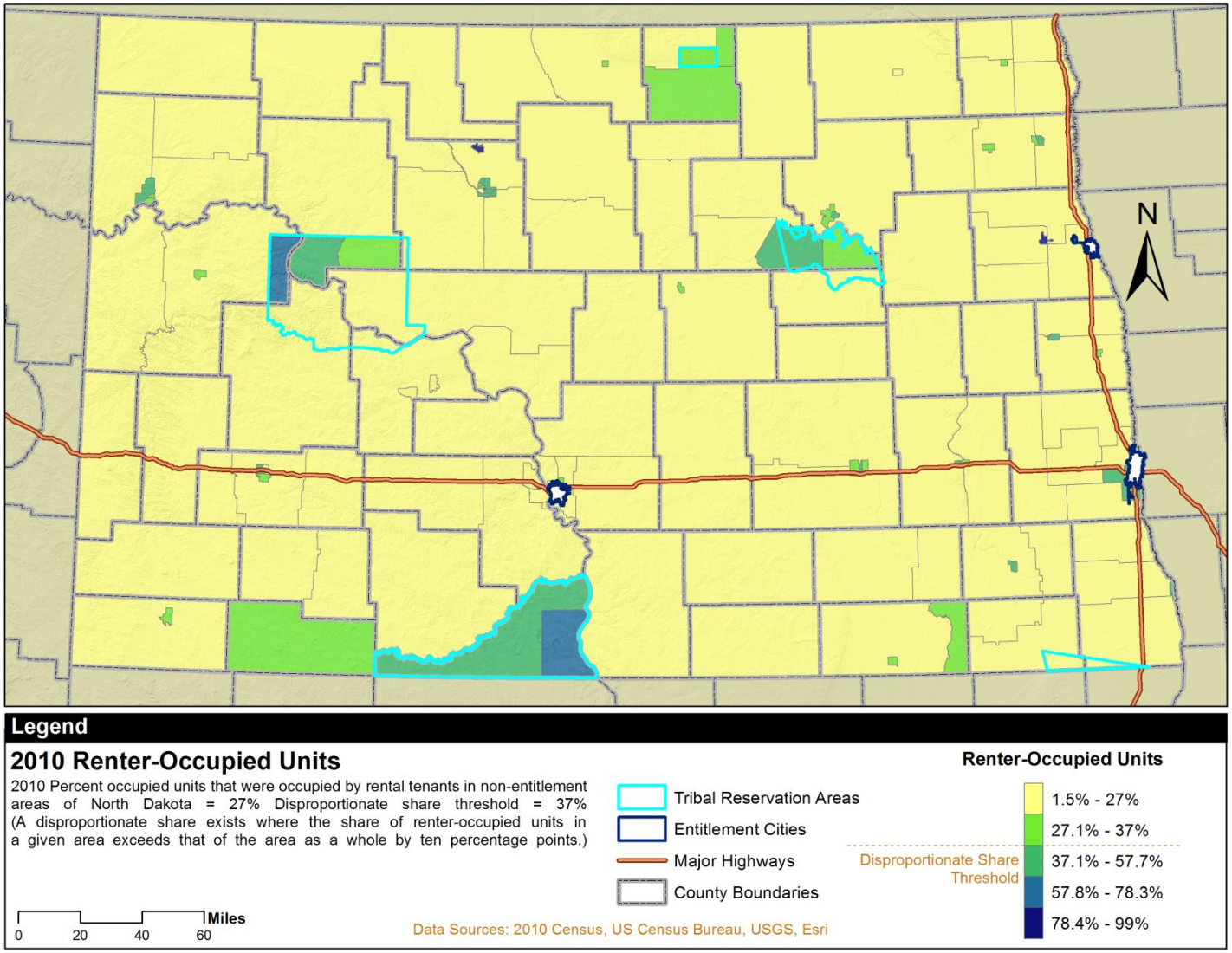


Maps IV.1 and IV.2, on the following pages, show the distribution of owner-occupied and renter-occupied units throughout the non-entitlement areas of the state. There are several areas with higher rates of owner-occupied housing. The areas with disproportionate share of renter occupied units are all in or adjacent to Tribal Reservation areas.

Map IV.1
Owner-Occupied Units
Non-entitlement areas of North Dakota
2010 Census Data



Map IV.1
Renter-Occupied Units
Non-entitlement areas of North Dakota
2010 Census Data



VACANT HOUSING

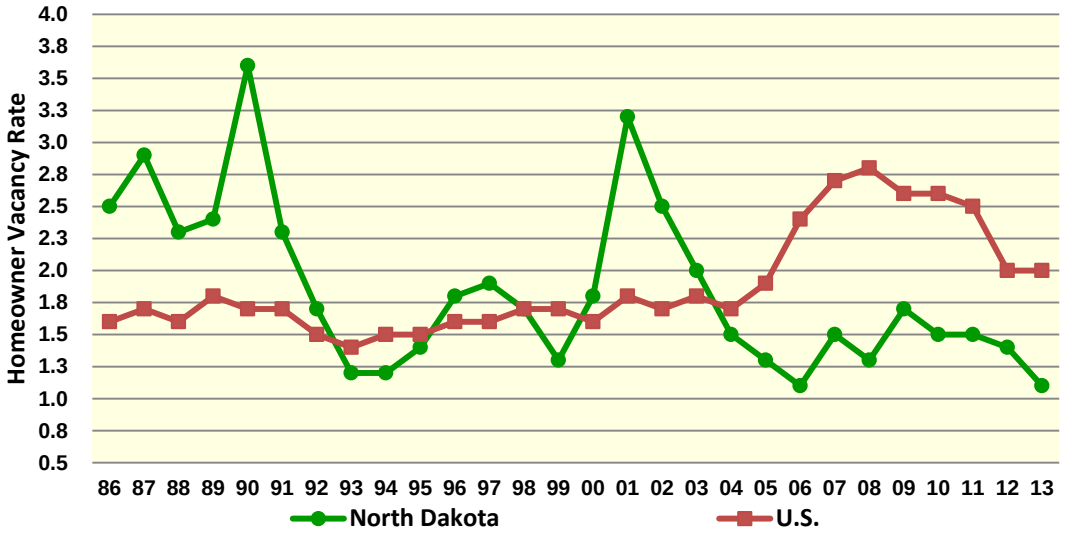
There was an 11.6 percent growth in vacant units in North Dakota from 2000 to 2010. Vacant for seasonal, recreation or occasional use units grew by 38.5 percent. Units classified as "other vacant" saw a 25.3 percent increase during this time period. For sale vacant housing saw a 55.3 percent decrease. "Other vacant" units accounted for the highest proportion of vacant units in 2010, followed by seasonal, recreational or occasional use. Units classified as "other vacant" may be particularly problematic as they are not available to the market place. Where such units are grouped in close proximity to each other, a blighting influence may be created.

Table IV.4
Disposition of Vacant Housing Units
Non-Entitlement Areas of North Dakota
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
For Rent	5,334	18.8%	4,419	14.5%	-17.15%
For Sale	3,999	14.1%	1,789	5.9%	-55.26%
Rented or Sold, Not Occupied	1,439	5.1%	1,241	4.1%	-13.76%
For Seasonal, Recreational, or Occasional Use	7,964	28.0%	11,027	36.1%	38.46%
For Migrant Workers	263	0.9%	315	01.0%	19.77%
Other Vacant	9,401	33.1%	11,776	38.5%	25.26%
Total	**28,400**	**100.0%**	**30,567**	**100.0%**	**7.6%**

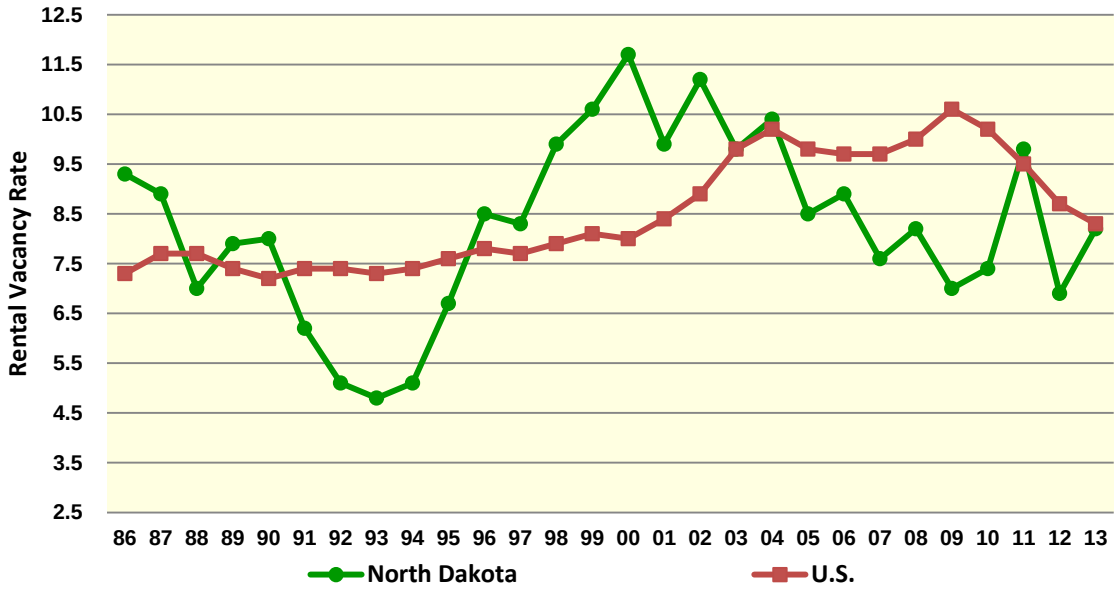
Census data regarding homeowner vacancy rates, as drawn from the annual surveys conducted by the Census Bureau, were also examined. As shown in Diagram IV.2, the homeowner vacancy rate in the state of North Dakota has intersected national rates at various points since 1986. The homeowner vacancy rate saw a large spike in 2001, but has declined to close to one percent in 2013.

Diagram IV.2
Homeowner Vacancy Rate
State of North Dakota
Census Data, 1984 - 2014



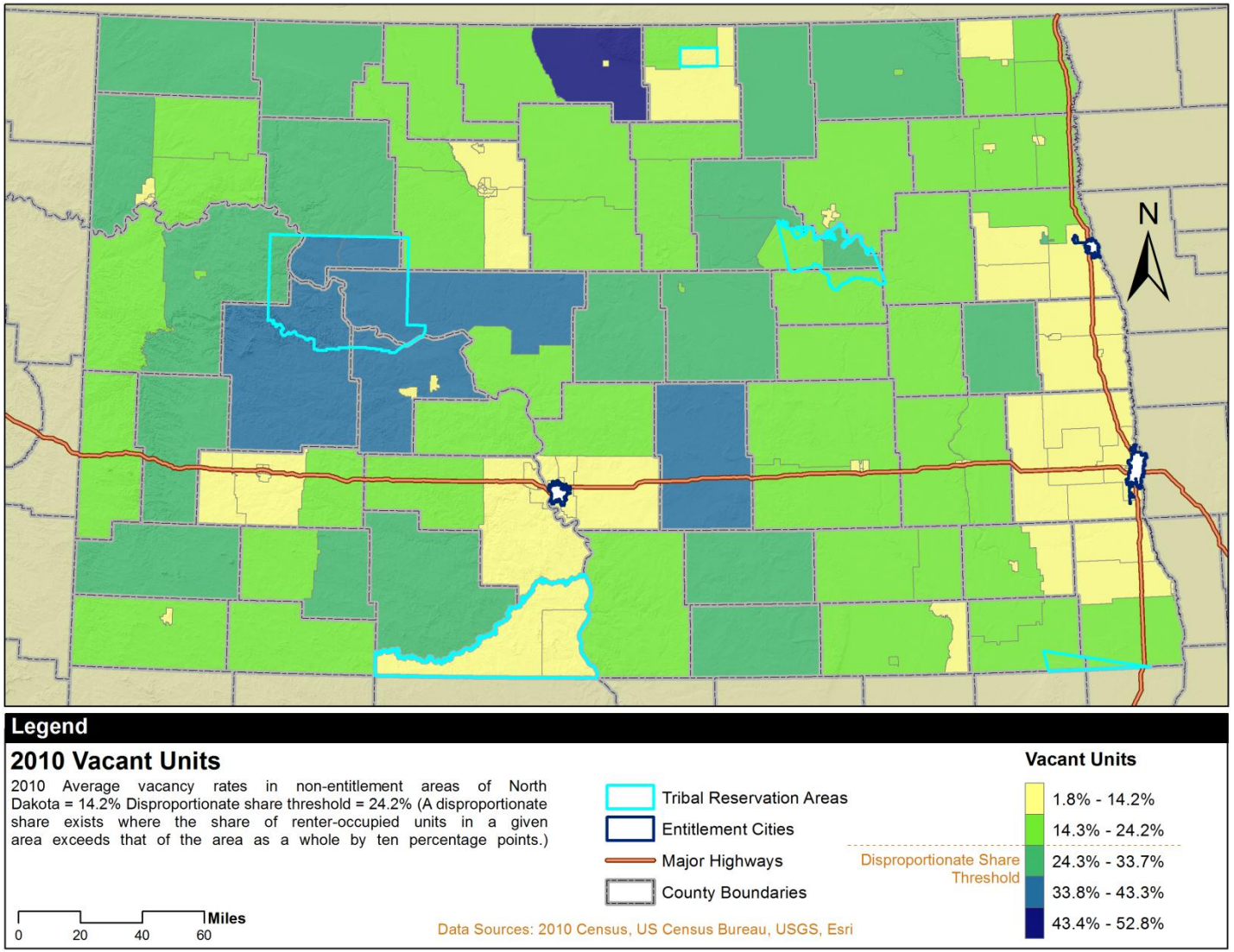
The rental vacancy rate for the State is shown in Diagram IV.3, below. The rental vacancy rate has seen fluctuation similar to that of the homeowner vacancy rate, and has intersected the national rate at several points. The rental vacancy rates reached its highest point in 2000 and have been declining since. Since 2004, the rental vacancy rate has remained below national levels.

Diagram IV.3
Rental Vacancy Rate
State of North Dakota
Census Data, 1984 - 2014

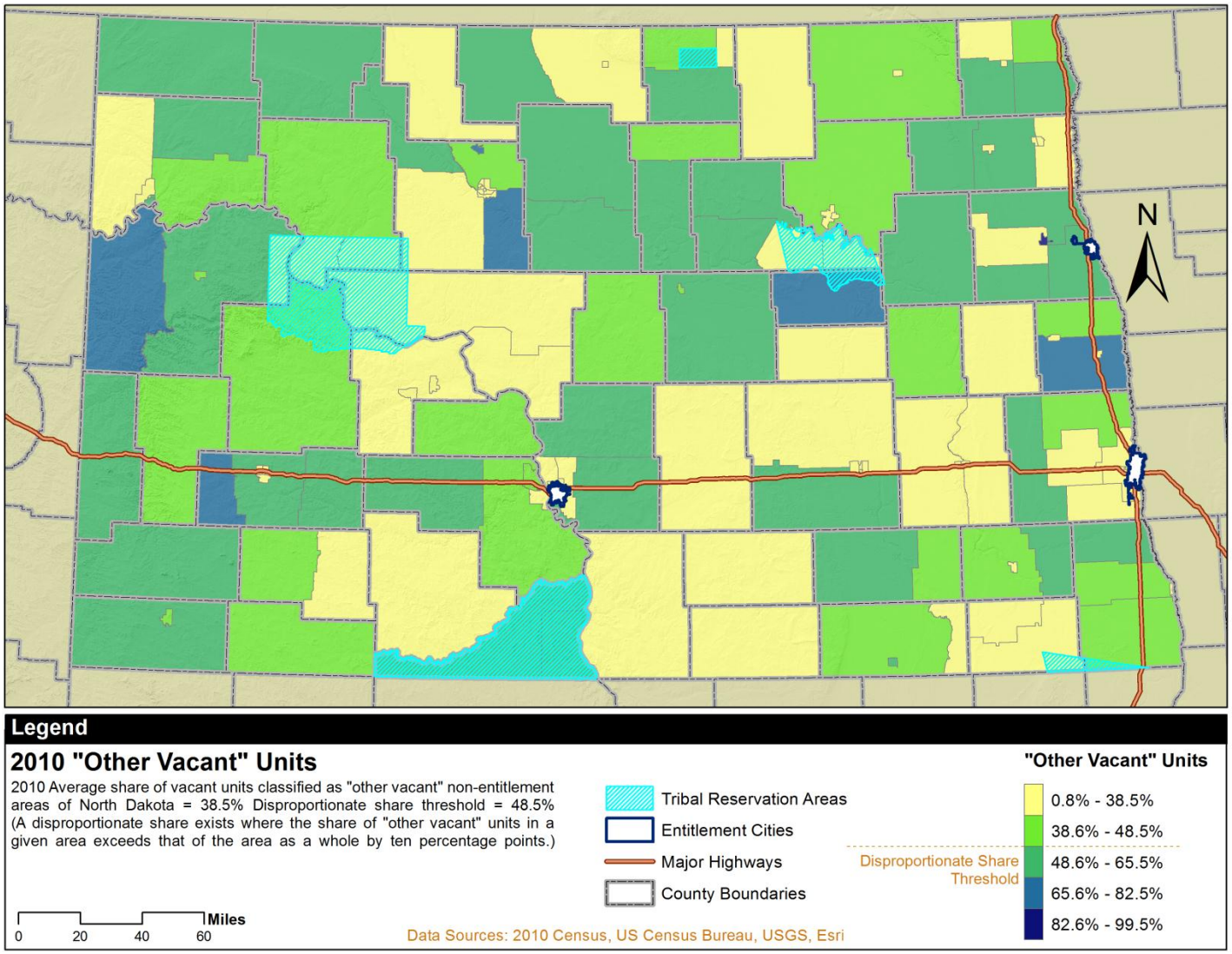


Map IV.3, on the following page, shows the distribution of vacant units across the state as of the 2010 Census. There were numerous counties all across the state with disproportionate shares of vacant housing. The counties that contained the highest concentration of vacant units included Bottineau County, followed by Dunn, Kidder, McLean, Mercer, and Montreal counties. Map IV.4 shows the percentage of vacant units classified as "other vacant." Similar to vacant units, there were numerous counties with disproportionate share of units classified as "other vacant." The counties that included the highest concentration of "other vacant" units included Eddy, McHenry, McKenzie, Stark, and Trail counties. As mentioned previously, vacant units classified as "other" are particularly problematic as they may not be available to the marketplace and areas with high concentration may create a blighting influence.

Map IV.3
Vacant Housing Units
Non-entitlement areas of North Dakota
2010 Census Data



Map IV.4
"Other Vacant" Housing Units
Non-entitlement areas of North Dakota
2010 Census Data



AGE OF THE HOUSING STOCK

The age of the housing stock is also reported in the 2012 American Community Survey. The age of the housing stock has been grouped into nine categories, ranging from 1939 or earlier through 2005 or later. Table IV.5 shows that substantial numbers of housing units were added to the stock in the 1970s, with units built in the 1970s accounting for 21.6 percent of the housing stock. Units built before 1939 accounted for 17.5 percent of the housing stock. Over 44 percent of all housing units were built prior to 1970.

Table IV.5
Households by Year Home Built
Non-Entitlement Areas of North Dakota
2000 Census SF3 & 2013 Five-Year ACS Data

Year Built	2000 Census		2013 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	38,440	22.0%	33,161	17.5%
1940 to 1949	12,141	6.9%	10,541	5.6%
1950 to 1959	20,233	11.6%	19,832	10.5%
1960 to 1969	21,719	12.4%	20,550	10.9%
1970 to 1979	41,950	24.0%	40,919	21.6%
1980 to 1989	22,785	13.0%	21,586	11.4%
1990 to 1999	17,716	10.1%	17,511	9.3%
2000 to 2004	.	.	21,771	11.5%
2005 or Later	.	.	3,165	1.7%
Total	**174,984**	**100.0%**	**189,036**	**100.0%**

C. HOUSING PRODUCTION AND AFFORDABILITY

HOUSING PRODUCTION

The Census Bureau reports the number of residential building permits issued each year for permit issuing places, including those in the non-entitlement areas of North Dakota. Reported data are single family units, duplexes, and tri- and four-plex units and all units within facilities comprising five or more units.

The number of single-family and multi-family units permitted in the non-entitlement areas of North Dakota has varied by year between 1980 and the present, but increased dramatically starting in 2010. The production of single family units has generally outnumbered the addition of new multifamily units until recent years. Total housing production, both single family and multi-family units, have increased significantly since 2010.

Table IV.6, on the following page, presents data on the number of manufactured homes placed in North Dakota, along with data regarding average price. Manufactured homes do not require a permit and are therefore not included in the previous data regarding housing permit activity.

In total, there were 12,506 manufactured homes placed in North Dakota between 1990 and 2013, including 5,220 single-wide and 6,260 double-wide homes.

Diagram IV.4
Permitted Units by Unit Type
Non-Entitlement Areas of North Dakota
U.S. Census Data

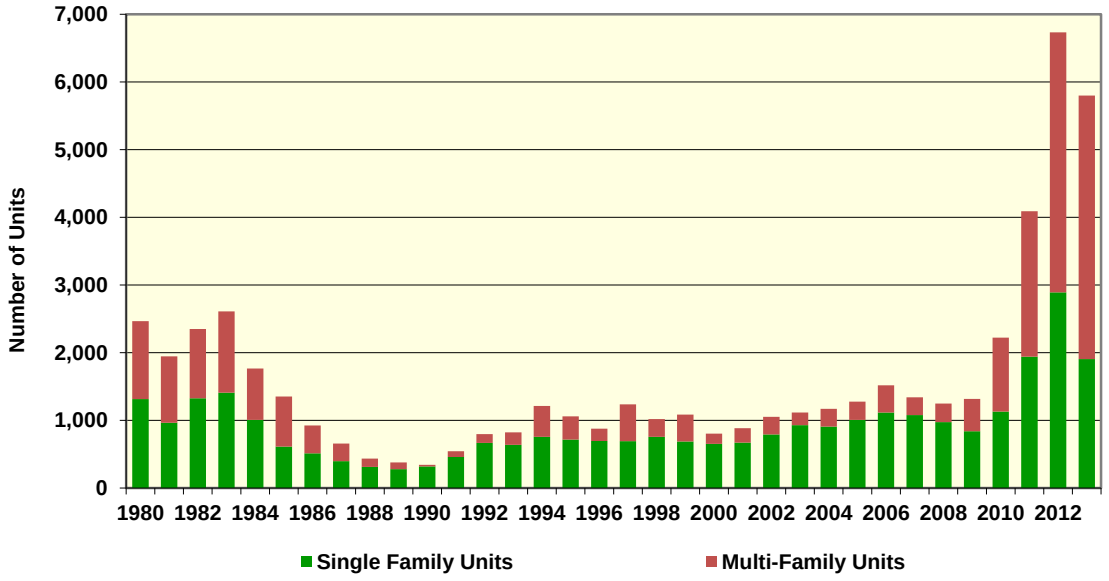


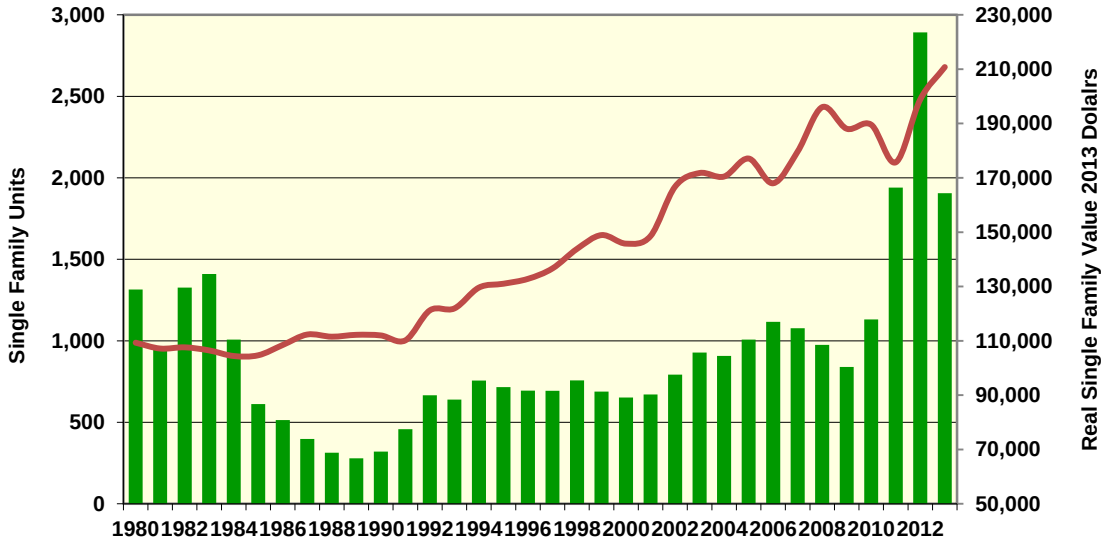
Table IV.6
Manufactured Housing Unit Placement and Price
State of North Dakota
Census Data, 1990 – 2013

Year	Units Placed in Service in State of North Dakota			Average Home Price, Nominal Dollars: State of North Dakota			Average Home Price, Nominal Dollars: U.S. Average		
	Single-wide	Double-wide	Total*	Single-wide	Double-wide	Total	Single-wide	Double-wide	Total
1990	0	0	0	0	0	0	19,800	36,600	27,800
1991	0	0	300	0	0	36,200	19,900	36,900	27,700
1992	300	200	500	25,200	46,100	32,700	20,600	37,200	28,400
1993	200	100	400	28,100	46,500	34,800	21,900	39,600	30,500
1994	320	300	620	31,600	42,900	37,100	23,500	42,000	32,800
1995	400	240	640	28,600	52,800	37,200	25,800	44,600	35,300
1996	300	400	700	32,900	50,400	43,900	27,000	46,200	37,200
1997	400	200	613	33,100	57,400	41,700	27,900	48,100	39,800
1998	400	420	833	33,900	50,000	42,700	28,800	49,800	41,600
1999	0	400	600	0	53,500	49,700	29,300	51,100	43,300
2000	0	400	500	0	60,000	55,800	30,200	53,600	46,400
2001	0	200	300	0	56,200	51,200	30,400	55,200	48,900
2002	0	400	500	0	59,700	52,100	30,900	56,100	51,300
2003	0	300	400	0	60,000	57,700	31,900	59,700	54,900
2004	0	200	200	0	70,500	70,500	32,900	63,400	58,200
2005	100	200	300	38,100	71,600	58,200	34,100	68,700	62,600
2006	0	200	200	0	72,000	66,000	36,100	71,300	64,300
2007	0	200	300	0	96,000	89,300	37,300	74,200	65,400
2008	200	200	400	45,500	92,800	79,000	38,000	75,800	64,700
2009	0	200	200	0	91,700	91,700	39,600	74,500	63,100
2010	500	200	700	50,700	93,300	66,800	39,500	74,500	62,800
2011	700	400	1,100	47,800	93,700	64,300	40,600	73,900	60,500
2012	1,000	500	1,500	49,600	104,600	69,200	41,100	75,700	62,200
2013	400	400	700	51,700	106,800	85,200	42,200	78,600	64,000

HOUSING PRICES

The Census Bureau also reports the value of construction appearing on a building permit, excluding the cost of land and related land development. As shown below in Diagram IV.5 the construction value of single-family dwellings generally increased from 1980 through 2013. The real single family value ended near $210,000 in 2013.

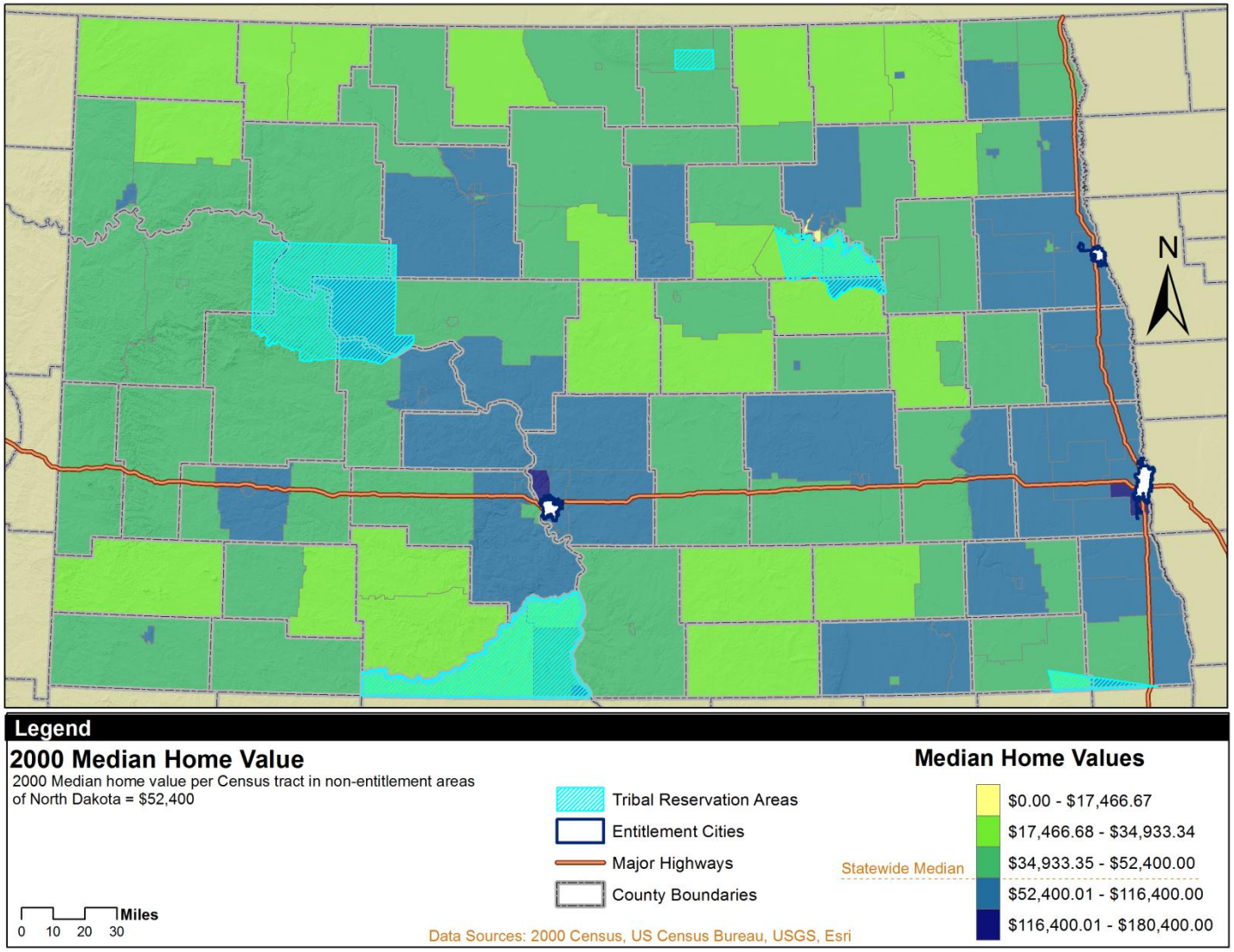
Diagram IV.5
Single Family Units and Per Unit Valuation
Non-Entitlement Areas of North Dakota
U.S. Census Data



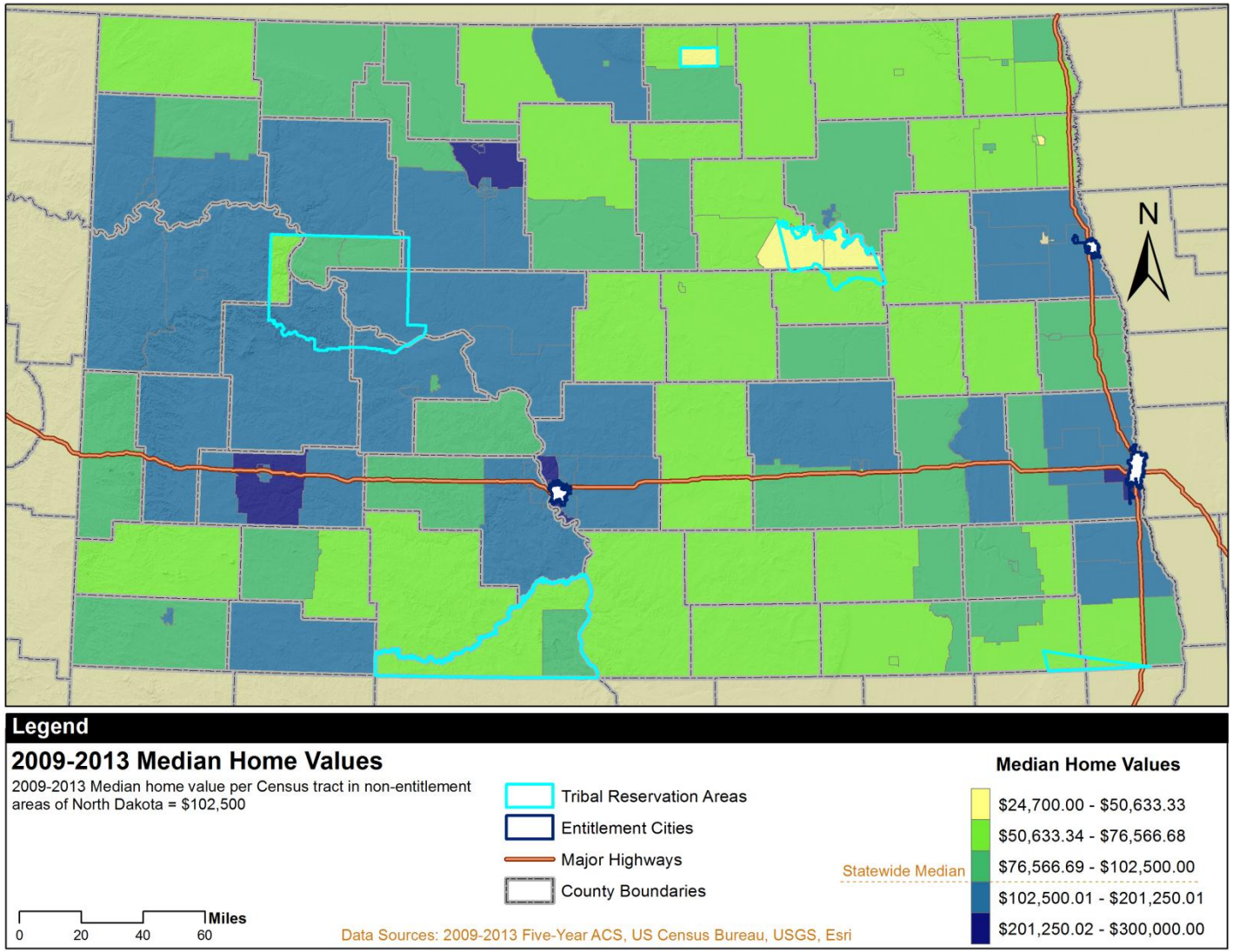
The distribution of housing values around the state of North Dakota as reported in the 2000 Census and the 2013 American Community Survey are presented in Maps IV.5 and IV.6 on the following pages. In 2000 there was a higher concentration of higher than median home values were on the eastern half of the state. This shifted to higher prices concentrated on the western portion of the state by 2013. In 2013, there were four areas where median home values exceeded $201,250, which were in Burleigh, Cass, Stark and Ward counties.

Maps IV.7 and IV.8 illustrate data on median gross rent prices by census tract derived from the 2000 Census and the 2013 American Community Survey for the non-entitlement areas of North Dakota. In this situation, gross rent refers to monthly contracted rental fees plus average monthly utility costs, which includes electricity, water and sewer services, and garbage removal. Some similarities can be seen when comparing this map and the previous map regarding home values, as higher rents shifted west.

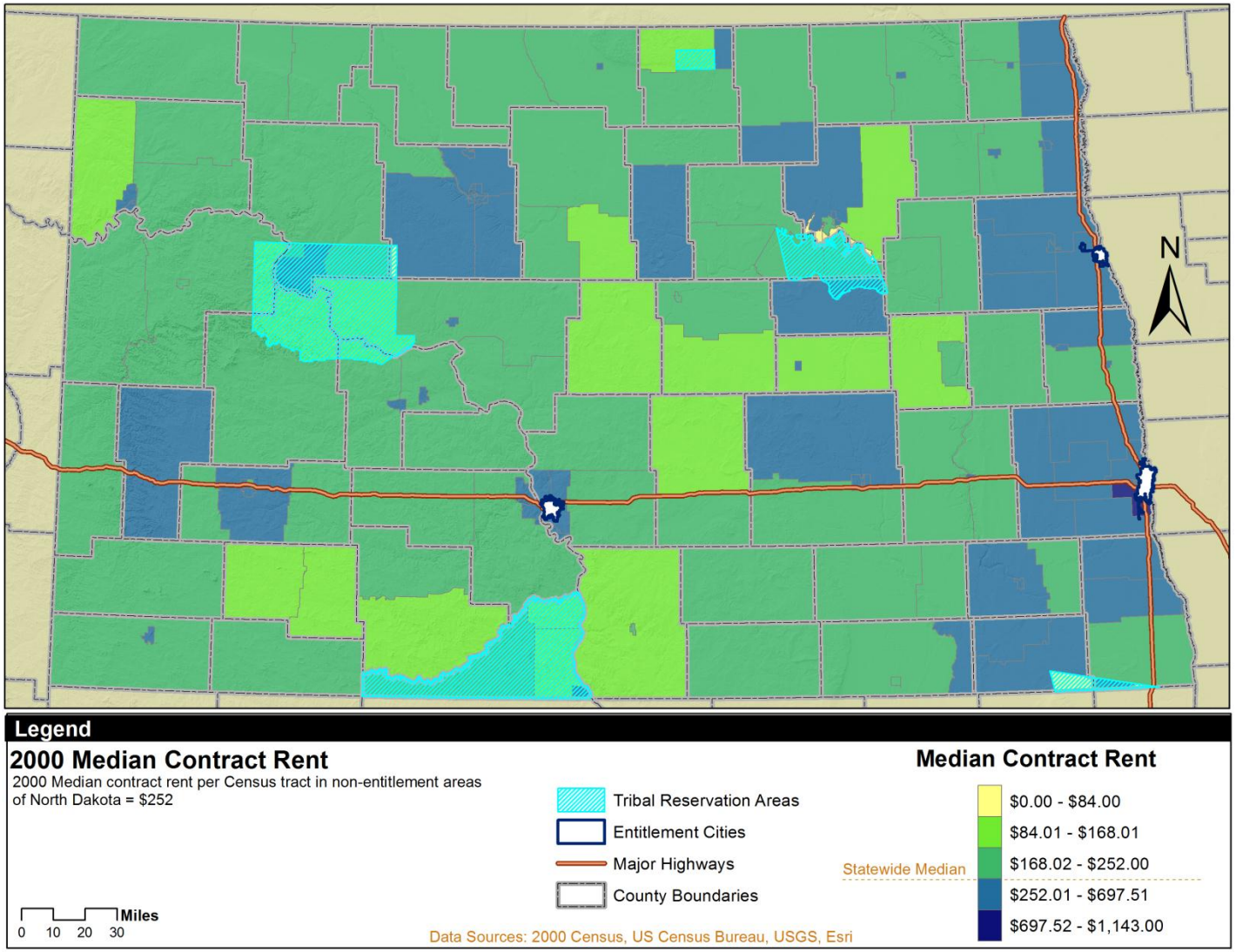
Map IV.5
2000 Median Home Value by Census Tract
Non-entitlement areas of North Dakota
2000 Census Data



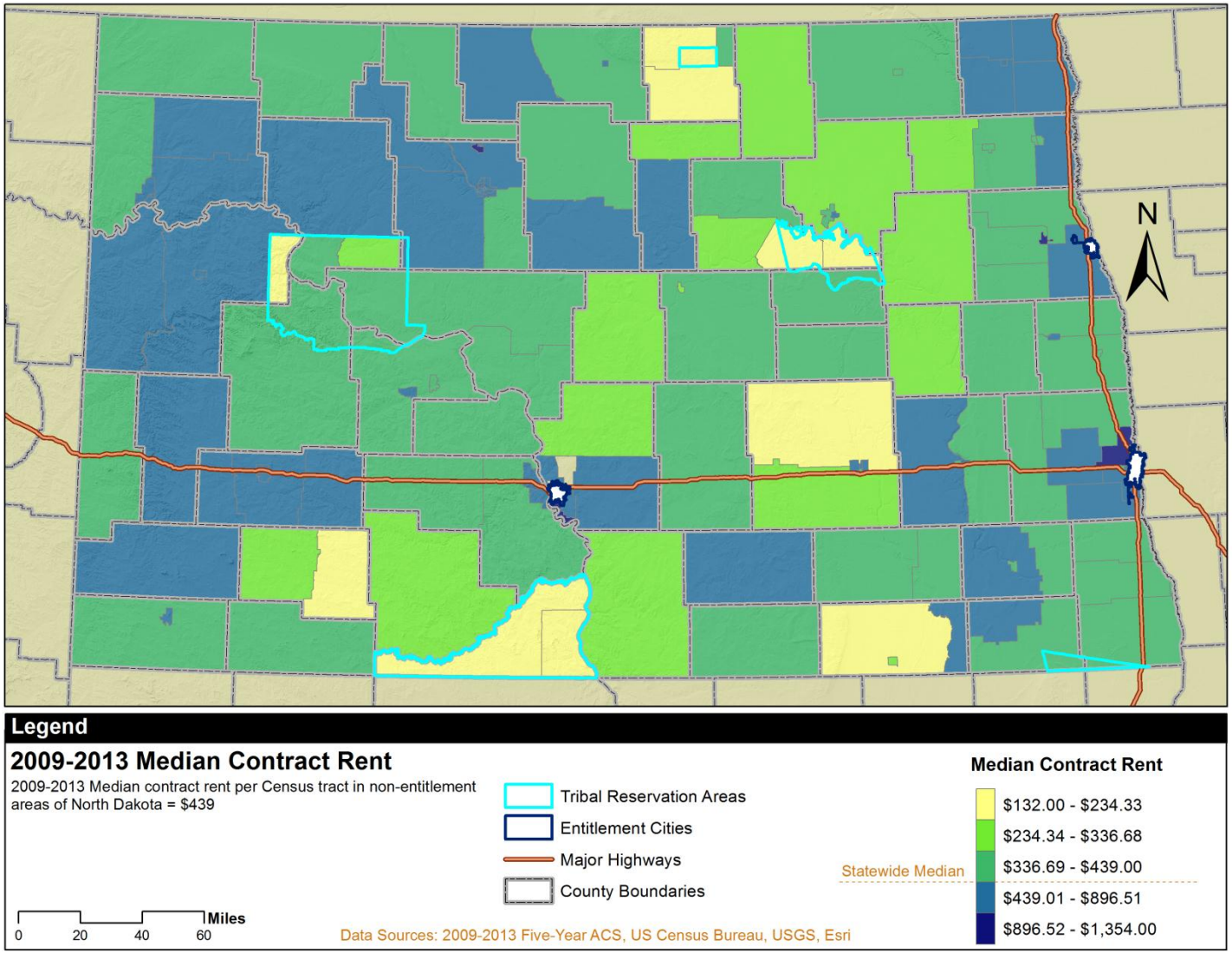
Map IV.6
2013 Median Home Value by Census Tract
Non-entitlement areas of North Dakota
2013 Five-Year ACS



Map IV.7
2000 Median Contract Rent by Census Tract
State of North Dakota
2000 Census Data



Map IV.8
2013 Median Contract Rent by Census Tract
Non-entitlement areas of North Dakota
2013 Five-Year ACS



As seen in Table IV.7, the median rent in North Dakota in 2010 was $535, compared to median rent in 2000 at $412. The median home value in 2010 was $123,900, compared to the median home value in 2000 at $74,400.

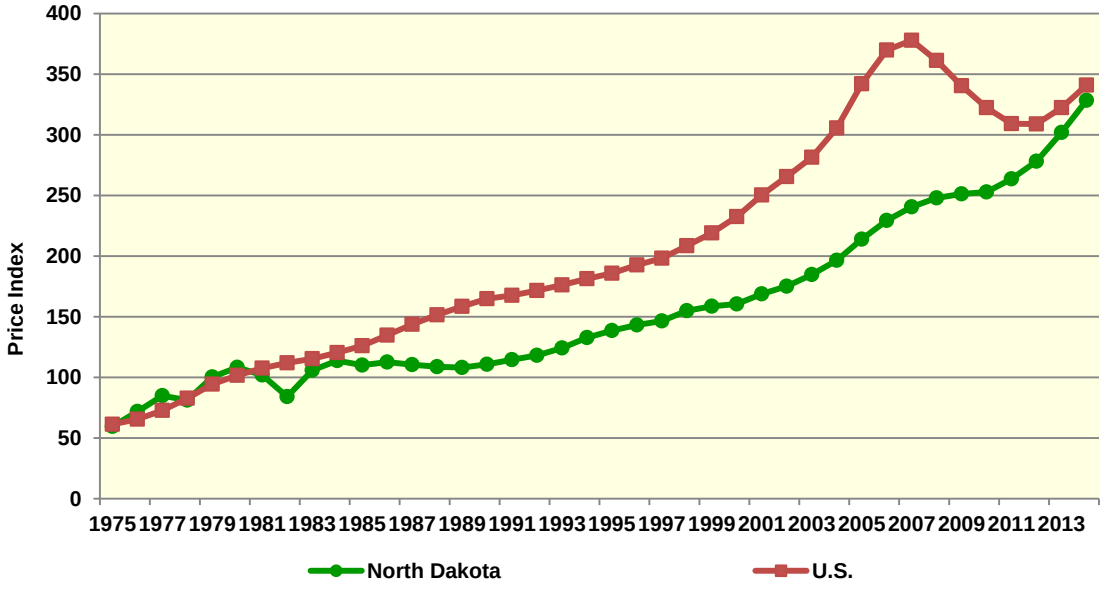
Table IV.7
Median Housing Costs
State of North Dakota
2000 Census SF3 & 2012 Five-Year ACS Data

Housing Cost	2000	2010
Median Contract Rent	$412	$535
Median Home Value	$74,400	$123,900

Another indicator of housing cost was provided by the Federal Housing Finance Agency (FHFA). The FHFA, the regulatory agency for Fannie Mae and Freddie Mac, tracks average housing price changes for single-family homes and publishes a Housing Price Index (HPI) reflecting price movements on a quarterly basis. This index is a weighted repeat sales index, meaning that it measures average price changes in repeat sales or refinancing on the same properties. This information was obtained by reviewing repeat mortgage transactions on single-family properties whose mortgages have been purchased or securitized by Fannie Mae or Freddie Mac since January 1975.[6] There are over 31 million repeat transactions in this database, which is computed monthly. All indexes, whether state or national, were set equal to 100 as of the first quarter of 2000.

Diagram IV.7 shows the housing price index for one quarter from each year from 1975 through 2014. As seen therein, the North Dakota index has been lower than the U.S. index since the late 1980s, closing the gap in the past couple years. The North Dakota index has continued to rise, while the national rate dipped during the recent recession.

Diagram IV.7
Housing Price Index
State of North Dakota vs. U.S
FHFA Second Quarter Data, 1975 – 2014: 1980 1Q = 100



[6] Office of Federal Housing Enterprise Oversight, News Release, December 1, 2006.

D. Household Housing Problems

Housing Problems

While the Census Bureau does not delve deeply into the physical condition of the housing stock, selected questions from the decennial census and the American Community Survey do indeed address housing difficulties being faced by householders. These housing difficulties are represented by three different conditions: overcrowding, lack of complete plumbing or kitchen facilities, and cost burden. Each of these conditions is addressed on the following pages.

Overcrowding

HUD defines an overcrowded household as one having from 1.01 to 1.50 occupants per room and a severely overcrowded household as one with more than 1.50 occupants per room. This type of condition can be seen in both renter and homeowner households. Table IV.8 shows that 1,862 households in non-entitlement areas of North Dakota were overcrowded in 2013, a reduction from 2,550 in 2000. Severely overcrowded households comprised 697 households, a decrease from 930 households in 2000. By 2013, the share of overcrowded households had fallen from 1.5 to 1.0 percent since 2000, and the share of severely overcrowded households had fallen from 0.5 to 0.4 percent. In both years, overcrowding and severe overcrowding were more prevalent in renter-occupied housing units than in owner-occupied units.

Table IV.8
Overcrowding and Severe Overcrowding
Non-Entitlement Areas of North Dakota
2000 Census SF3 & 2013 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	126,445	98.7%	1,318	1.0%	402	0.3%	128,165
2013 Five-Year ACS	137,780	99.1%	923	0.7%	328	0.2%	139,031
Renter							
2000 Census	45,059	96.2%	1,232	2.6%	528	1.1%	46,819
2013 Five-Year ACS	48,697	97.4%	939	1.9%	369	0.7%	50,005
Total							
2000 Census	171,504	98.0%	2,550	1.5%	930	0.5%	174,984
2013 Five-Year ACS	186,477	98.6%	1,862	1.0%	697	0.4%	189,036

Households Lacking Complete Kitchen or Plumbing Facilities

According to the Census Bureau, a housing unit is classified as lacking complete kitchen facilities when any of the following is not present in a housing unit: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator. Likewise, a housing unit is categorized as lacking complete plumbing facilities when any of the following are missing from the housing unit: piped hot and cold water, a flush toilet, and a bathtub or shower. A lack of these facilities indicates that the housing unit is likely to be unsuitable.

Around 0.6 percent of the housing stock of non-entitlement areas of North Dakota lacked complete kitchen facilities in 2013. This figure represented about 1,077 units, as shown in Table IV.9, below. This was an increase from the 2000 by an estimated 277 units, an d0.1 percentage points.

Table IV.9
Households with Incomplete Kitchen Facilities
Non-Entitlement Areas of North Dakota
2000 Census SF3 & 2013 Five-Year ACS Data

Households	2000 Census	2013 Five-Year ACS
With Complete Kitchen Facilities	174,184	187,959
Lacking Complete Kitchen Facilities	800	1,077
Total Households	**174,984**	**189,036**
Percent Lacking	**0.5%**	**0.6%**

Similar proportions of housing units lacked complete plumbing facilities in both years, as shown in Table IV.10, below. In 2000, some 0.5 percent of housing units had inadequate plumbing facilities. By 2012, this figure had decreased to 0.3 percent, with 555 households.

Table IV.10
Households with Incomplete Plumbing Facilities
Non-Entitlement Areas of North Dakota
2000 Census SF3 & 2012 Five-Year ACS Data

Households	2000 Census	2013 Five-Year ACS
With Complete Plumbing Facilities	174,105	188,481
Lacking Complete Plumbing Facilities	879	555
Total Households	**174,984**	**189,036**
Percent Lacking	**0.5%**	**0.3%**

Cost Burden

Another type of housing problem reported in the 2000 Census was cost burden, which occurs when a household has gross housing costs that range from 30 to 49.9 percent of gross household income; severe cost burden occurs when gross housing costs represent 50 percent or more of gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent plus utility charges.

According to 2000 Census data, 10.6 percent of households in non-entitlement areas of North Dakota experienced a cost burden at that time. An additional 6.4 percent of households experienced a severe cost burden. By 2013, some 10.8 percent of households were cost-burdened, and the share of households experiencing a severe cost burden had grown to 7.2 percent. This is shown in Table IV.11.

Table IV.11
Cost Burden and Severe Cost Burden by Tenure
Non-Entitlement Areas of North Dakota
2000 Census & 2013 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	37,773	82.5%	5,493	12.0%	2,332	5.1%	209	.5%	45,807
2013 Five-Year ACS	57,499	82.0%	8,775	12.5%	3,713	5.3%	130	0.2%	70,117
Owner Without a Mortgage									
2000 Census	37,355	88.9%	2,400	5.7%	1,552	3.7%	689	1.6%	41,996
2013 Five-Year ACS	61,417	89.1%	3,931	5.7%	3,008	4.4%	558	0.8%	68,914
Renter									
2000 Census	26,070	59.0%	6,035	13.7%	4,567	10.3%	7,505	17.0%	44,177
2013 Five-Year ACS	27,592	55.2%	7,640	15.3%	6,930	13.9%	7,843	15.7%	50,005
Total									
2000 Census	101,198	76.7%	13,928	10.6%	8,451	6.4%	8,403	6.4%	131,980
2013 Five-Year ACS	146,508	77.5%	20,346	10.8%	13,651	7.2%	8,531	4.5%	189,036

Cost Burden by Region

Each Region had varying cost burden throughout the state. The section below will provide more detailed information for each region and its experience with cost burden.

Region 1 had cost burdens at a rate lower than the average for the non-entitlement areas of the state, with 6.4 percent of households experiencing a cost burden and 5.4 percent experiencing a severe cost burden. There was an almost five percentage point decline in cost burden, however, between 2000 and 2011. Table IV.12, below demonstrates this data.

Table IV.12
Cost Burden and Severe Cost Burden by Tenure
Region 1
2000 Census & 2013 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	2,304	80.3%	378	13.2%	185	6.4%	4	0.1%	2,871
2013 Five-Year ACS	4,471	88.9%	360	7.2%	164	3.3%	34	0.7%	5,029
Owner Without a Mortgage									
2000 Census	2,438	90.5%	133	4.9%	85	3.2%	38	1.4%	2,694
2013 Five-Year ACS	4,514	92.7%	140	2.9%	140	2.9%	75	1.5%	4,869
Renter									
2000 Census	1,837	63.8%	416	14.5%	271	9.4%	354	12.3%	2,878
2013 Five-Year ACS	2,878	68.3%	405	9.6%	463	11.0%	468	11.1%	4,214
Total									
2000 Census	6,579	77.9%	927	11.0%	541	6.4%	396	4.7%	8,443
2013 Five-Year ACS	11,863	84.1%	905	6.4%	767	5.4%	577	4.1%	14,112

Table IV.13, on the following page, shows the cost burden for Region 2. This Region experienced a higher rate of cost burdens, and a growth between 2000 and 2011. Some 12.4 percent of households had a cost burden and an additional 8.4 percent were severely cost burdened, both experienced a growth of almost one percentage point.

Table IV.13
Cost Burden and Severe Cost Burden by Tenure
Region 2
2000 Census & 2013 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	7,195	80.9%	1,161	13.1%	487	5.5%	48	0.5%	8,891
2013 Five-Year ACS	10,668	80.4%	1,785	13.5%	780	5.9%	29	0.2%	13,262
Owner Without a Mortgage									
2000 Census	6,601	89.3%	415	5.6%	258	3.5%	120	1.6%	7,394
2013 Five-Year ACS	10,786	88.1%	782	6.4%	563	4.6%	113	0.9%	12,244
Renter									
2000 Census	5,673	52.1%	1,599	14.7%	1,297	11.9%	2,321	21.3%	10,890
2013 Five-Year ACS	6,117	49.5%	2,111	17.1%	1,836	14.8%	2,304	18.6%	12,368
Total									
2000 Census	19,469	71.6%	3,175	11.7%	2,042	7.5%	2,489	9.2%	27,175
2013 Five-Year ACS	27,571	72.8%	4,678	12.4%	3,179	8.4%	2,446	6.5%	37,874

Region 3's cost burden was fairly similar to the non-entitlement average for the state. Some 17.9 percent of households in this region experienced a cost burden or severe cost burden in 2011. This was a slight growth from 2000 and in shown in Table IV.14, below.

Table IV.14
Cost Burden and Severe Cost Burden by Tenure
Region 3
2000 Census & 2013 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	2,366	83.0%	321	11.3%	147	5.2%	16	0.6%	2,850
2013 Five-Year ACS	3,267	82.7%	449	11.4%	229	5.8%	4	0.1%	3,949
Owner Without a Mortgage									
2000 Census	3,957	89.6%	191	4.3%	195	4.4%	74	1.7%	4,417
2013 Five-Year ACS	6,324	88.8%	364	5.1%	362	5.1%	71	1.0%	7,121
Renter									
2000 Census	2,842	61.3%	611	13.2%	527	11.4%	658	14.2%	4,638
2013 Five-Year ACS	2,589	55.2%	681	14.5%	733	15.6%	686	14.6%	4,689
Total									
2000 Census	9,165	77.0%	1,123	9.4%	869	7.3%	748	6.3%	11,905
2013 Five-Year ACS	12,180	77.3%	1,494	9.5%	1,324	8.4%	761	4.8%	15,759

Table IV.15, on the following page, breaks down cost burden in Region 4. This Region had an overall lower cost burden than the statewide average, although it did increase between 2000 and 2010. Some 15.4 percent of households in 2011 experienced a cost burden or severe cost burden, up from 14.5 percent in 2000.

Table IV.15
Cost Burden and Severe Cost Burden by Tenure
Region 4
2000 Census & 2013 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	3,073	79.6%	541	14.0%	236	6.1%	10	0.3%	3,860
2013 Five-Year ACS	4,224	82.6%	652	12.7%	222	4.3%	16	0.3%	5,114
Owner Without a Mortgage									
2000 Census	3,879	89.8%	226	5.2%	153	3.5%	64	1.5%	4,322
2013 Five-Year ACS	5,451	89.1%	391	6.4%	248	4.1%	26	0.4%	6,116
Renter									
2000 Census	2,047	50.0%	414	10.1%	211	5.2%	1,425	34.8%	4,097
2013 Five-Year ACS	1,746	49.3%	492	13.9%	275	7.8%	1,030	29.1%	3,543
Total									
2000 Census	8,999	73.3%	1,181	9.6%	600	4.9%	1,499	12.2%	12,279
2013 Five-Year ACS	11,421	77.3%	1,535	10.4%	745	5.0%	1,072	7.3%	14,773

Region 5's rate of cost burden increased by two percentage points between 2000 and 2011, and severe cost burden increased by 1.3 percentage points. A total of 18.7 percent of households faced cost burdens by 2011, as shown in Table IV.16, below.

Table IV.16
Cost Burden and Severe Cost Burden by Tenure
Region 5
2000 Census & 2013 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	8,055	84.6%	1,037	10.9%	387	4.1%	45	0.5%	9,524
2013 Five-Year ACS	12,188	80.8%	2,168	14.4%	702	4.7%	28	0.2%	15,086
Owner Without a Mortgage									
2000 Census	4,867	90.6%	279	5.2%	154	2.9%	74	1.4%	5,374
2013 Five-Year ACS	8,270	90.2%	483	5.3%	320	3.5%	98	1.1%	9,171
Renter									
2000 Census	4,239	66.3%	863	13.5%	572	9.0%	715	11.2%	6,389
2013 Five-Year ACS	5,053	60.5%	1,316	15.8%	1,098	13.2%	882	10.6%	8,349
Total									
2000 Census	17,161	80.6%	2,179	10.2%	1,113	5.2%	834	3.9%	21,287
2013 Five-Year ACS	25,511	78.2%	3,967	12.2%	2,120	6.5%	1,008	3.1%	32,606

The rate of housing cost burdens in Region 6 remained close to the statewide average, at 11.5 percent cost burdened and 7.8 percent severely cost burdened. The rate did grow, however, increasing the number of households with a cost burden by over 800 households and an increase of over 700 households with severe cost burdens.

Table IV.17
Cost Burden and Severe Cost Burden by Tenure
Region 6
2000 Census & 2013 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	4,729	84.4%	567	10.1%	287	5.1%	19	0.3%	5,602
2013 Five-Year ACS	6,226	82.2%	965	12.7%	372	4.9%	9	0.1%	7,572
Owner Without a Mortgage									
2000 Census	6,269	88.4%	469	6.6%	244	3.4%	113	1.6%	7,095
2013 Five-Year ACS	9,119	86.9%	735	7.0%	574	5.5%	68	.6%	10,496
Renter									
2000 Census	4,050	62.4%	993	15.3%	613	9.4%	831	12.8%	6,487
2013 Five-Year ACS	3,608	54.7%	1,144	17.3%	969	14.7%	876	13.3%	6,597
Total									
2000 Census	15,048	78.4%	2,029	10.6%	1,144	6.0%	963	5.0%	19,184
2013 Five-Year ACS	18,953	76.8%	2,844	11.5%	1,915	7.8%	953	3.9%	24,665

Regions 7's rate of cost burden remained below the state's non-entitlement area average. There were a total of 3,296 households with cost burdens in 2011 and an additional 2,349 households with severe cost burdens, as seen in Table IV.18.

Table IV.18
Cost Burden and Severe Cost Burden by Tenure
Region 7
2000 Census & 2013 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	6,658	82.1%	1,014	12.5%	392	4.8%	43	0.5%	8,107
2013 Five-Year ACS	11,271	80.2%	1,852	13.2%	918	6.5%	7	0.0%	14,048
Owner Without a Mortgage									
2000 Census	5,933	87.7%	442	6.5%	292	4.3%	99	1.5%	6,766
2013 Five-Year ACS	11,083	89.8%	649	5.3%	551	4.5%	59	.5%	12,342
Renter									
2000 Census	3,128	61.6%	630	12.4%	595	11.7%	729	14.3%	5,082
2013 Five-Year ACS	3,394	56.3%	795	13.2%	880	14.6%	959	15.9%	6,028
Total									
2000 Census	15,719	78.8%	2,086	10.5%	1,279	6.4%	871	4.4%	19,955
2013 Five-Year ACS	25,748	79.4%	3,296	10.2%	2,349	7.2%	1,025	3.2%	32,418

Table IV.19 shows the rate of cost burdens for Region 8. Some 9.7 percent of households experienced a cost burden in 2011 and 7.4 percent of households experienced a severe cost burden. This represented a total of 2,879 households.

Table IV.19
Cost Burden and Severe Cost Burden by Tenure
Region 8
2000 Census & 2013 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	3,393	82.7%	474	11.6%	211	5.1%	24	0.6%	4,102
2013 Five-Year ACS	5,184	85.6%	544	9.0%	326	5.4%	3	0.0%	6,057
Owner Without a Mortgage									
2000 Census	3,411	86.7%	245	6.2%	171	4.3%	107	2.7%	3,934
2013 Five-Year ACS	5,870	89.5%	387	5.9%	250	3.8%	48	.7%	6,555
Renter									
2000 Census	2,254	60.7%	509	13.7%	481	12.9%	472	12.7%	3,716
2013 Five-Year ACS	2,207	52.3%	696	16.5%	676	16.0%	638	15.1%	4,217
Total									
2000 Census	9,058	77.1%	1,228	10.4%	863	7.3%	603	5.1%	11,752
2013 Five-Year ACS	13,261	78.8%	1,627	9.7%	1,252	7.4%	689	4.1%	16,829

E. Lead-Based Paint Hazards and Actions to Overcome Hazards

Lead-Based Paint Hazards

Older homes, particularly those built prior to 1978, have a greater likelihood of lead-based paint hazards than homes built after 1978, when lead as an ingredient in paint was banned. Indeed, environmental issues play an important role in the quality of housing. Exposure to lead-based paint, which is more likely to occur in these older homes, is one of the most significant environmental threats posed to homeowners and renters.

Medical understanding of the harmful effects of lead poisoning on children and adults in both the short- and long-term is increasing. Evidence shows that lead dust is a more serious hazard than ingestion of lead-based paint chips. Dust from surfaces with intact lead-based paint is pervasive and poisonous when inhaled or ingested. Making the situation more difficult is the fact that lead dust is so fine that it cannot be collected by conventional vacuum cleaners.

Lead-based paint was banned from residential use because of the health risk it posed, particularly to children. Homes built prior to 1980 have some chance of containing lead-based paint on interior or exterior surfaces. The chances increase with the age of the housing units. HUD has established estimates for determining the likelihood of housing units containing lead-based paint. These estimates are as follows:

- 90 percent of units built before 1940;
- 80 percent of units built from 1940 through 1959; and
- 62 percent of units built from 1960 through 1979.

Other factors used to determine the risk for lead-based paint problems include the condition of the housing unit, tenure and household income. Households with young children are also at greater risk because young children have more hand-to-mouth activity and absorb lead more readily than adults. The two factors most correlated with higher risks

of lead-based paint hazards are residing in rental or lower-income households. Low-income residents are less likely to be able to afford proper maintenance of their homes, leading to issues such as chipped and peeling paint, and renters are not as likely or are not allowed to renovate their rental units.

National Efforts to Reduce Lead-Based Paint Hazards

In 1991 Congress formed HUD's Office of Healthy Homes and Lead Hazard Control to eradicate lead-based paint hazards in privately-owned and low-income housing in the U.S. One way it has done this is by providing grants for communities to address their own lead paint hazards. Other responsibilities of this office are enforcement of HUD's lead-based paint regulations, public outreach and technical assistance, and technical studies to help protect children and their families from health and safety hazards in the home.[7]

Then in 1992, to address the problem more directly, Congress passed the Residential Lead-Based Paint Hazard Reduction Act, also known as Title X, which developed a comprehensive federal strategy for reducing lead exposure from paint, dust and soil, and provided authority for several rules and regulations, including the following:

1. **Lead Safe Housing Rule** – mandates that federally-assisted or owned housing facilities notify residents about, evaluate, and reduce lead-based paint hazards.
2. **Lead Disclosure Rule** – requires homeowners to disclose all known lead-based paint hazards when selling or leasing a residential property built before 1978. Violations of the Lead Disclosure Rule may result in civil money penalties of up to $11,000 per violation.[8]
3. **Pre-Renovation Education Rule** – ensures that owners and occupants of most pre-1978 housing are given information about potential hazards of lead-based paint exposure before certain renovations happen on that unit.
4. **Lead Renovation, Repair and Painting Program Rule** – establishes standards for anyone engaging in target housing renovation that creates lead-based paint hazards.[9]

A ten-year goal was set in February 2000 by President Clinton's Task Force on Environmental Health Risks and Safety Risks to Children to eliminate childhood lead poisoning in the U.S. as a major public health issue by 2010. As a means to achieve this goal, they released the following four broad recommendations in their "Eliminating Childhood Lead Poisoning: A Federal Strategy Targeting Lead Paint Hazards," report:

1. **Prevent lead exposure in children** by, among other actions, increasing the availability of lead-safe dwellings through increased funding of HUD's lead hazard control program, controlling lead paint hazards, educating the public about lead-safe painting, renovation and maintenance work, and enforcing compliance with lead paint laws.
2. **Increase early intervention to identify and care for lead-poisoned children** through screening and follow-up services for at-risk children, especially Medicaid-eligible children,

[7] "About the Office of Healthy Homes and Lead Hazard Control." 21 February 2011. U.S. Department of Housing and Urban Development. 12 May 2014 <http://www.hud.gov/offices/lead/about.cfm>.
[8] "Lead Programs Enforcement Division - HUD." *Homes and Communities - U.S. Department of Housing and Urban Development (HUD)*. 12 May 2014 <http://www.hud.gov/offices/lead/enforcement/index.cfm>.
[9] "Lead: Rules and Regulations | Lead in Paint, Dust, and Soil | US EPA." *U.S. Environmental Protection Agency*. 31 Dec. 2008 <http://www.epa.gov/lead/pubs/regulation.htm>.

and increasing coordination between federal, state and local agencies who are responsible for lead hazard control, among other measures.

3. **Conduct research** to, for example, develop new lead hazard control technologies, improve prevention strategies, promote innovative ways to decrease lead hazard control costs, and quantify the ways in which children are exposed to lead.
4. **Measure progress and refine lead poisoning prevention strategies** by, for instance, implementing monitoring and surveillance programs.

Continuing these efforts, the U.S. Department of Health and Human Services launched Healthy People 2020, which included the goal of eliminating childhood blood lead levels $\geq 10\ \mu g/dL$.[10] As part of the National Center for Environmental Health, the program works with other agencies to address the problem of unhealthy and unsafe housing through surveillance, research and comprehensive prevention programs.[11]

In 2010, the Environmental Protection Agency (EPA) enacted the Lead Renovation, Repair, and Painting Rule (RRP). This rule requires that any firms performing renovation, repair, and painting projects that disturb lead-based paint in homes, child care facilities and pre-schools built before 1978 must be certified by the EPA.[12]

Lead-Based Paint Hazards for Children

Children's exposure to lead has decreased dramatically over the past few decades due to federal mandates that lead be phased out of items such as gasoline, food and beverage cans, water pipes, and industrial emissions. However, despite a ban in 1978 on the use of lead in new paint, children living in older homes are still at risk from deteriorating lead-based paint and its resulting lead contaminated household dust and soil. Today lead-based paint in older housing remains one of the most common sources of lead exposure for children[13].

Thirty-eight million housing units in the United States had lead-based paint during a 1998 to 2000 survey, down from the 1990 estimate of 64 million. Still, 24 million housing units in the survey contained significant lead-based paint hazards. Of those with hazards, 1.2 million were homes to low-income families with children under 6 years of age.[14]

National Efforts to Reduce Lead Exposure in Children

There have been a number of substantive steps taken by the U.S. to reduce and eliminate blood lead poisoning in children. The Lead Contamination Control Act (LCCA) of 1988 authorized the Centers for Disease Control and Prevention (CDC) to make grants to state and local agencies for childhood lead poisoning prevention programs that develop prevention programs and policies, educate the public, and support research to determine the effectiveness of prevention efforts at federal, state, and local levels. The CDC has

[10] http://www.cdc.gov/nceh/Lead/
[11] http://www.cdc.gov/nceh/eehs/
[12] http://www2.epa.gov/lead/renovation-repair-and-painting-program
[13] "Protect Your Family". March 2014. *EPA*. Environmental Protection Agency. Web. 2 May 2014. <http://www2.epa.gov/lead/protect-your-family#sl-home>.
[14] Jacobs, David E., Robert P. Clickner, Joey Y. Zhou, Susan M. Viet, David A. Marker, John W. Rogers, Darryl C. Zeldin, Pamela Broene, and Warren Friedman. "The Prevalence of Lead-Based Paint Hazards in U.S. Housing." *Environmental Health Perspectives* 110 (2002): A599-606. *Pub Med*. 12 May 2014 <http://www.pubmedcentral.nih.gov/picrender.fcgi?artid=1241046&blobtype=pdf>.

carried out these activities through its Childhood Lead Poisoning Prevention Program.[15] One of the most significant actions the CDC has taken to lower blood lead levels (BLLs) in children over the past few decades is their gradual changing of the definition of an EBLL. For example, during the 1960s the criteria for an EBLL was ≥60 micrograms per deciliter (μg/dL). It then dropped to ≥40 μg/dL in 1971, to ≥30 μg/dL in 1978, ≥25 μg/dL in 1985, and most recently, ≥ 10 μg/dL in 1991.[16]

Roughly 14 out of every 1,000 children in the United States between the ages of 1 and 5 have blood lead levels greater than 10 micrograms of lead per deciliter of blood. This is the level at which public health actions should be initiated according to the Centers for Disease Control and Prevention.

Results of National Efforts

All of these coordinated and cooperative efforts at the national, state and local levels have created the infrastructure needed to identify high-risk housing and to prevent and control lead hazards. Consequently, EBLLs in U.S. children have decreased dramatically. For example, in 1978 nearly 14.8 million children in the U.S. had lead poisoning; however, by the early 90s that number had dropped substantially to 890,000.[17] According to data collected by the CDC, this number is dropping even more. In 1997, 7.6 percent of children under 6 tested had lead levels ≥10 μg/dL. By 2012, even after the number of children being tested had grown significantly, only 0.62 percent had lead levels ≥10 μg/dL.[18]

Amidst all of this success, a debate exists in the field of epidemiology about the definition of EBLLs in children. A growing body of research suggests that considerable damage occurs even at BLLs below 10 μg/dL. For example, inverse correlations have been found between BLLs <10 μg/dL and IQ, cognitive function and somatic growth.[19] Further, some studies assert that some effects can be more negative at BLLs below 10 μg/dL than above it.[20]

While the CDC acknowledges these associations and does not refute that they are, at least in part, causal, they have yet to lower the level of concern below 10 μg/dL. The reasons the CDC gives for this decision are as follows: it is critical to focus available resources where negative effects are greatest, setting a new level would be arbitrary since no exact

[15] "Implementation of the Lead Contamination Control Act of 1988." Editorial. *Morbidity and Mortality Weekly Report* 01 May 1992: 288-90. 05 Aug. 1998. Centers for Disease Control. 12 May 2014 <http://www.cdc.gov/mmwr/preview/mmwrhtml/00016599.htm>.
[16] Lanphear, MD MPH, Bruce P et al. "Cognitive Deficits Associated with Blood Lead Concentrations" *Public Health Reports* 115 (2000): 521-29. Pub Med. 12 May 2014 <http://www.pubmedcentral.nih.gov/picrender.fcgi?artid=1308622&blobtype=pdf>.
[17] *Eliminating Childhood Lead Poisoning: A Federal Strategy Targeting Lead Paint Hazards*. Feb. 2000. President's Task Force on Environmental Health Risks and Safety Risks to Children. 12 May 2014 <http://www.cdc.gov/nceh/lead/about/fedstrategy2000.pdf>.
[18] http://www.cdc.gov/nceh/lead/data/StateConfirmedByYear1997-2012.htm
[19] *Preventing Lead Poisoning in Young Children*. Aug. 2005. Centers for Disease Control and Prevention. 12 May 2014 <http://www.cdc.gov/nceh/lead/Publications/PrevleadPoisoning.pdf>.
[20] Matte, MD, MPH, Thomas D., David Homa, PhD, Jessica Sanford, PhD, and Alan Pate. *A Review of Evidence of Adverse Health Effects Associated with Blood Lead Levels < 10 μg/dL in Children*. Centers for Disease Control and Prevention, Work Group of the Advisory Committee on Childhood Lead Poisoning Prevention. 12 May 2014 <http://www.cdc.gov/nceh/lead/ACCLPP/SupplementalOct04/Work%20Group%20Draft%20Final%20Report_Edited%20October%207,%202004%20-%20single%20spaced.pdf>.

threshold has been established for adverse health effects from lead, and the ability to successfully and consistently reduce BLLs below 10 μg/dL has not been demonstrated.[21]

LEAD-BASED PAINT HAZARDS IN NORTH DAKOTA

Table IV.20, below, presents data regarding the vintage of households, broken down by presence of children age 6 and under and income. There were 33,683 units built prior to 1940, of which some 4,128 had children present under the age of 6. In addition, there were 91,410 households in units built between 1940 and 1979, with 12,795 households containing children under the age of 6.

Table IV.20
Vintage of Households by Income and Presence of Young Children
Non-Entitlement Areas of North Dakota
2007–2011 HUD CHAS Data

Income	One or more children age 6 or younger	No children age 6 or younger	Total
Built 1939 or Earlier			
30% HAMFI or less	350	4,315	4,665
30.1-50% HAMFI	452	4,005	4,457
50.1-80% HAMFI	936	5,670	6,606
80.1%-100.0% HAMFI	775	3,640	4,415
100.1% HAMFI and above	1,615	11,925	13,540
Total	4,128	29,555	33,683
Built 1940 to 1979			
30% HAMFI or less	1,745	10,245	11,990
30.1-50% HAMFI	1,590	9,790	11,380
50.1-80% HAMFI	2,435	15,105	17,540
80.1%-100.0% HAMFI	1,720	8,650	10,370
100.1% HAMFI and above	5,305	34,825	40,130
Total	12,795	78,615	91,410
Built 1980 or Later			
30% HAMFI or less	795	4,655	5,450
30.1-50% HAMFI	955	4,755	5,710
50.1-80% HAMFI	1,510	7,375	8,885
80.1%-100.0% HAMFI	1,240	5,185	6,425
100.1% HAMFI and above	5,755	25,855	31,610
Total	10,255	47,825	58,080
Total			
30% HAMFI or less	2,890	19,215	22,105
30.1-50% HAMFI	2,997	18,550	21,547
50.1-80% HAMFI	4,881	28,150	33,031
80.1%-100.0% HAMFI	3,735	17,475	21,210
100.1% HAMFI and above	12,675	72,605	85,280
Total	**27,178**	**155,995**	**183,173**

Table IV.21, on the following page, shows households at risk of lead-based paint by tenure and income. There were a total of 8,802 owner-occupied households with children aged 6 and younger at risk of lead-based paint exposure. There were an additional 3,997 renter-occupied households with children aged 6 or under at risk of exposure.

[21] *Preventing Lead Poisoning in Young Children*. Aug. 2005. Centers for Disease Control and Prevention. 12 May 2014. <http://www.cdc.gov/nceh/lead/Publications/PrevleadPoisoning.pdf>.

Table IV.21
Households at Risk of Lead Based Paint by Tenure by Income
Non-Entitlement Areas of North Dakota
2006–2010 HUD CHAS Data

Income	One or more children age 6 or younger	No children age 6 or younger	Total
Owner Occupied Households			
30% HAMFI or less	445	5,809	6,254
30.1-50% HAMFI	703	6,828	7,531
50.1-80% HAMFI	1,630	11,238	12,868
80.1% HAMFI or more	1,563	7,490	9,054
100.1% HAMFI and above	4,461	31,126	35,588
Total	8,802	62,492	71,294
Renter Occupied Households			
30% HAMFI or less	1,109	5,348	6,457
30.1-50% HAMFI	833	3,727	4,560
50.1-80% HAMFI	941	4,589	5,531
80.1% HAMFI or more	355	1,927	2,283
100.1% HAMFI and above	759	4,332	5,091
Total	3,997	19,924	23,921
Total			
30% HAMFI or less	1,554	11,157	12,711
30.1-50% HAMFI	1,536	10,555	12,091
50.1-80% HAMFI	2,571	15,828	18,399
80.1% HAMFI or more	1,919	9,418	11,336
100.1% HAMFI and above	5,220	35,458	40,678
Total	**12,800**	**82,416**	**95,216**

NORTH DAKOTA LEAD REMOVAL EFFORTS

In 2013, some 3,856 children in North Dakota were tested for blood lead levels. Table IV.22 shows the number of children that had elevated blood lead levels. There were 85 children that demonstrated some level of elevated blood lead levels in 2013. This accounted for 2.2 percent of the children tested.

Table IV.22
Children Blood Lead Levels 2013
State of North Dakota
North Dakota Department of Health

Lead level	Number of children
5-9.99 ug/dL	24
10-14 ug/dL	30
15-19 ug/dL	14
20-24 ug/dL	5
25-29 ug/dL	5
30+ ug/dL	7
Subtotal	85
Total number of children tested	**3,856**

The State of North Dakota has continued working with the North Dakota State Health Department and the University of North Dakota to provide training for lead-based paint

risk assessors. In addition, the State has coordinated with the Community Action Agencies to increase the amount of lead-based paint testing activities.

F. Public and Assisted Housing

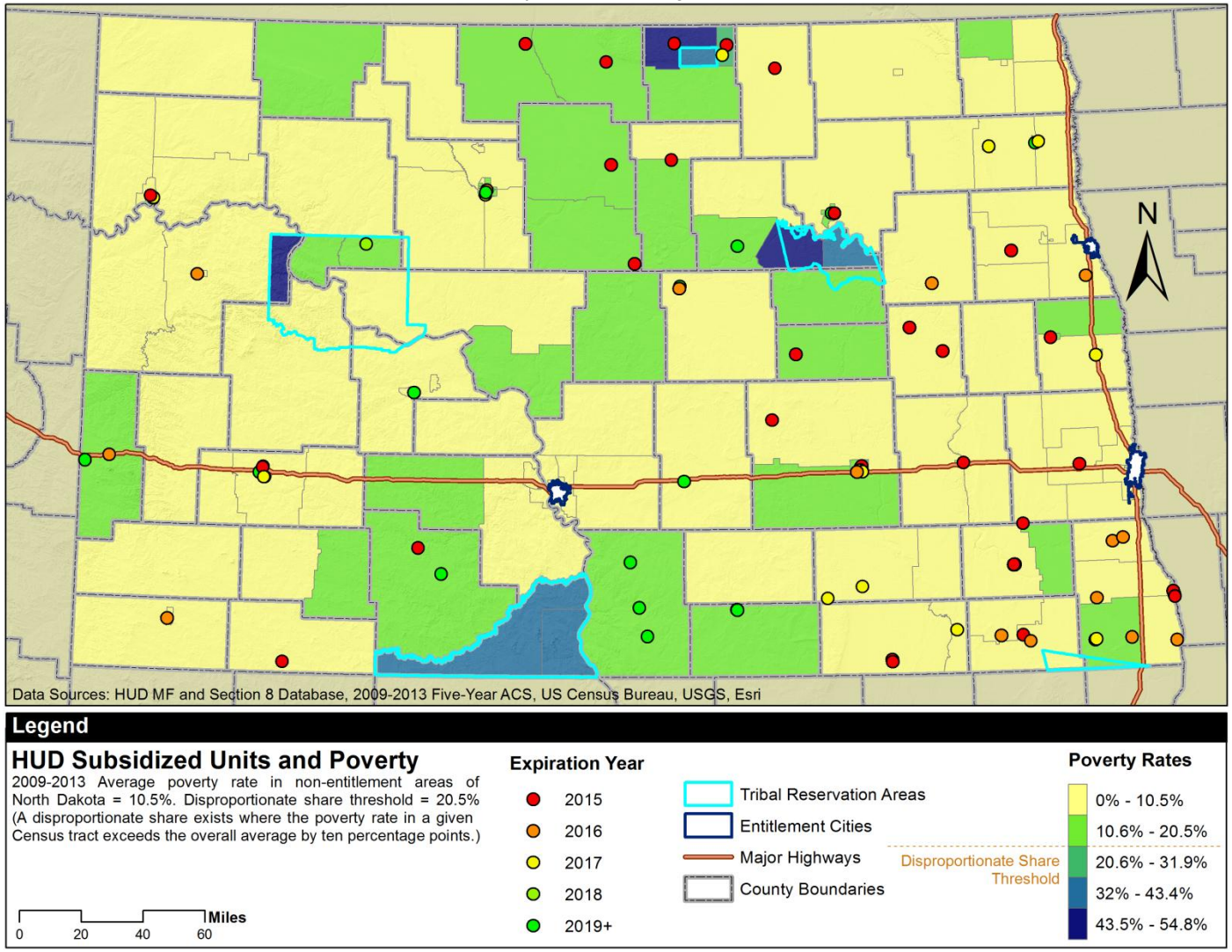
The state does not have a statewide public housing authority. However, HUD and NDDOC are concerned about the number of public housing units and their underlying contracts that are at risk of expiring. If this were to happen, 1,812 public housing units in the state would be eliminated from the affordable housing stock, as indicated in Table IV.23.

Table IV.23
Expiring Multifamily Housing
Non-Entitlement Areas of North Dakota
HUD Multifamily Contracts Database

Expiration Year	Expiring Contracts	Units at Risk
2015	41	823
2016	18	310
2017	15	273
2018	2	53
2019	10	138
2020+	8	215
Total	**94**	**1,812**

These housing units that are at risk in North Dakota are distributed throughout the state, as shown in Map IV.9, on the following page. Some of these units are set to expire in 2015, as shown in red.

Map IV.9
Expiring Section 8 Contracts
Non-Entitlement Areas of North Dakota
HUD Multi-Family Assisted Housing Contract Database



G. Institutional Barriers to Affordable Housing

The 2014 Housing and Community Development Survey included a question about barriers to affordable housing. Table IV.24, below, shows the responses received. The top responses including cost of land or lot, cost of labor, lack of qualified builders, cost of materials, lack of affordable development policies and Not in My Back Yard (NIMBY) mentality.

Table IV.24
Do any of the following acts as barriers to the development or preservation of housing?
Non-Entitlement Areas of North Dakota
2014 Housing and Community Development Survey

Barrier	Number of Citations
Cost of land or lot	57
Cost of labor	57
Cost of materials	51
Lack of qualified contractors or builders	50
Lack of Affordable housing development policies	43
Not In My Back Yard (NIMBY) mentality	38
Lack of other infrastructure	30
Lack of available land	30
Lack of sewer system	29
Lack of water system	25
Construction fees	16
Density or other zoning requirements	14
Building codes	10
ADA codes	9
Other Barriers	9
Lack of water	8
Permitting fees	8
Permitting process	8
Lot size	8
Impact fees	5

The regional public input meetings also had comments that related to the barriers to affordable housing in various parts of the state. Some of the comments are as follows:

- High cost of land
- Conservative lending practices
- Lack of qualified affordable housing developers
- High price of land
- High construction costs
- Lack of incentives to build affordable units

H. SUMMARY

In 2000, the North Dakota had 289,677 total housing units. Since that time, the total housing stock increased by a total of almost 50,000 units, reaching 339,313 units in 2013. According to the American Community Survey in 2012, North Dakota's non-entitlement housing stock included 162,804 single family units, some 22,758 apartment units and 20,068 mobile home units. Of the 215,445 housing units counted in non-entitlement areas of North Dakota in the 2010 census, some 184,878 units were occupied, with 134,869 counted as owner-occupied and 50,009 counted as renter-occupied. The vacancy rate for non-entitlement areas of the state was 14.2 percent in 2010. The construction value of single-family dwellings generally increased from 1980 through 2013, reaching close to $210,000 by 2013.

V. Housing and Homeless Needs Assessment

A. Introduction

This section addresses housing and homeless needs in North Dakota. Specific needs and the priority level of these needs were determined based on data from the 2014 Housing and Community Development Survey, focus groups, public input meetings, and from consultation with representatives of various state and local agencies throughout North Dakota.

B. Housing Needs Assessment

The 2014 Housing and Community Development Needs Survey was conducted as part of the process of evaluating housing needs in North Dakota. A total of 98 responses were received from stakeholders throughout non-entitlement areas of the state. One of the first survey questions asked respondents to identify how they would allocate housing and community development resources in the state. Table V.1 shows that housing was the primary focus for funding, with respondents indicating that this category should receive over 29 percent of funding, public facilities, economic development, water systems and human services with over 14 percent, and infrastructure with over 12 percent.

Table V.1
How Would You Allocate Your Resources Among These Areas?
Non-Entitlement Areas of North Dakota
2014 Housing and Community Development Survey

Area	Percentage Allocated
Housing	29.30%
Public Facilities	14.51%
Economic Development	14.32%
Water Systems	14.23%
Human Services	14.07%
Infrastructure	12.34%
All Other	1.23%
Total	**100.00%**

Survey respondents were asked to rate the need for a variety of rental and homeowner housing activities. Using the same rating scale as that needed for the Consolidated Plan, respondents were asked to rank the needs as none, low, medium, or high need.

Expressed Housing Needs

Table V.2, on the following page, shows the ranking for several housing activities. Construction of new for-sale housing, construction of new rental housing, rental housing for very-low income households and homeowner housing rehabilitation were the top rated needs. This was followed by senior-friendly housing and rental housing rehabilitation.

Table V.2
Please rate the need for the following Housing activities.
Non-Entitlement Areas of North Dakota
2014 Housing and Community Development Survey

Question	No Need	Low Need	Medium Need	High Need	Missing	Total
Construction of new for-sale housing		9	50	113	51	223
Construction of new rental housing		12	48	113	50	223
Rental housing for very low-income households	4	31	50	84	54	223
Homeowner housing rehabilitation	2	21	64	83	53	223
Senior-friendly housing	2	24	64	81	52	223
Rental housing rehabilitation	3	19	65	80	56	223
Supportive housing	13	31	52	75	52	223
First-time home-buyer assistance	2	20	70	73	58	223
Rental assistance	2	21	71	73	56	223
Preservation of federal subsidized housing	8	23	64	72	56	223
Energy efficient retrofits	3	30	65	70	55	223
Retrofitting existing housing to meet seniors' needs	3	24	78	63	55	223
Mixed income housing	9	36	70	50	58	223
Housing demolition	12	76	47	31	57	223
Mixed use housing	13	47	75	28	60	223
Homeownership in communities of color	34	58	48	20	63	223
Downtown housing	22	69	58	18	56	223
Other Housing activities	11	2	4	15	191	223

HOUSING NEEDS NOTED AT THE FOCUS GROUPS

Three focus groups were held January 7, 2015 in Bismarck. The purpose of the focus group meetings was to gain deeper insight from housing and community development stakeholders in North Dakota regarding three topic areas: affordable housing, homelessness and infrastructure. Comments gathered from the focus groups regarding housing are summarized as follows:

- Lack of housing to meet needs of growing population
- Substandard housing in many areas
- Declining population in some parts, leaving vacant housing
- Not enough resources to meet needs or do renovations due to high demand

HOUSING NEEDS NOTED AT PUBLIC INPUT MEETINGS

Eight public input meetings were held, one in each region. A complete set of notes from comments received during each meeting is found in Appendix D, and provides comments broken down by each region. Some major themes noted throughout all the regions include:

- Need for emergency homeless shelters
- Need for new rentals
- Need for rental assistance

- Need for housing rehab
- Need for transitional housing, permanent supportive housing
- Need to preserve existing housing
- Need for senior friendly housing
- Need for housing for large families

C. Unmet Housing Needs

Households that experience one or more housing problems are considered to have unmet housing needs. Housing problems, as presented earlier in this document, include overcrowding, lacking complete kitchen or plumbing facilities, and cost burden. Householders with unmet need can be of any income level, race, ethnicity or family type. For the purposes presented herein, these data have been segmented by tenure, renters and homeowners, and by percent of median family income.

Table V.4 presents owner-occupied households with housing problems by income as well as family type. A table with the complete data set can be found in Appendix C. In addition, in Appendix C, there are two additional tables that break housing needs down by renter and owner occupied households. There were 34,946 households with housing problems in 2011. Elderly non-families face the highest rate of housing problems, with 35.8 percent of these households facing housing problems in 2011. Large families and "other" households also exceed the average rate of housing problems, having housing problems at a rate of 23.9 percent and 23.7 percent respectively.

There were 29,741 households under 80 percent MFI with housing problems in 2011 in the non-entitlement areas of North Dakota. Some 38.8 percent of households below 80 percent MFI face some sort of housing problem.

Table V.4
Households by Housing Problems
Non-Entitlement Areas of North Dakota
2007–2011 HUD CHAS Data

Income	Elderly Family	Small Family	Large Family	Elderly Non-Family	Other Household	Total
Housing Problem						
30% HAMFI or less	1,165	3,260	856	5,600	3,990	14,871
30.1-50% HAMFI	1,025	2,405	660	2,330	2,015	8,435
50.1-80% HAMFI	775	2,555	900	735	1,470	6,435
80.1% HAMFI or more	585	2,415	800	325	1,080	5,205
Total	3,550	10,635	3,216	8,990	8,555	34,946
Total						
30% HAMFI or less	1,949	4,515	1,046	8,810	5,786	22,106
30.1-50% HAMFI	3,955	5,220	1,280	6,445	4,655	21,555
50.1-80% HAMFI	6,150	10,965	2,346	4,960	8,605	33,026
80.1% HAMFI or more	16,510	59,345	8,765	4,865	17,010	106,495
Total	**28,564**	**80,045**	**13,437**	**25,080**	**36,056**	**183,182**

D. Disproportionate Needs

A disproportionate need exists when the percentage of persons experiencing a housing problem in a group is at least 10 percentage points higher than the jurisdiction's percentage of persons experiencing a housing problem as a whole. Table V.5, below, presents the disproportionate need of owner-occupied households by income and race. The table with the complete data set is provided in in Appendix C. Black households have disproportionate need at income levels below 30 percent HAMFI and over 100 percent HAMFI. Asian households have disproportionate need of housing problems for households at income levels between 50 and 80 percent HAMFI. Households that are identified as "other" race also have disproportionate share of housing problems between 30 percent HAMFI and 80 percent HAMFI, as well as overall.

Table V.5
Total Households with Housing Problems by Income and Race
Non-Entitlement Areas of North Dakota
2007–2011 HUD CHAS Data

Income	Non-Hispanic by Race/Ethnicity						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
30% HAMFI or less	12,230	110	55	2,021	0	240	205	14,861
30.1-50% HAMFI	7,370	69	25	580	4	195	195	8,438
50.1-80% HAMFI	5,965	31	60	250	0	55	60	6,421
80.1-100% HAMFI	2,340	11	15	65	0	4	35	2,470
100.1% HAMFI or more	2,560	36	10	75	0	25	25	2,731
Total	30,465	257	165	2,991	4	519	520	34,921
Total								
30% HAMFI or less	18,205	125	99	3,071	0	324	275	22,099
30.1-50% HAMFI	18,990	269	115	1,405	64	305	415	21,563
50.1-80% HAMFI	30,465	201	196	1,475	4	195	480	33,016
80.1-100% HAMFI	19,620	296	55	830	4	125	275	21,205
100.1% HAMFI or more	81,420	251	310	1,975	0	470	865	85,291
Total	**168,700**	**1,142**	**775**	**8,756**	**72**	**1,419**	**2,310**	**183,174**

E. Priority Housing Needs Rankings

Since the Consolidated Plan guidelines were first requested by HUD in the mid 1990's, North Dakota has ranked and prioritized its housing needs, set goals for meeting these needs, and estimated unmet housing needs. This has been expressed by the Consolidated Plan Table 2A. In establishing its five-year priorities and assigning priority need levels, the state considered both of the following:

- Categories of lower- and moderate-income households most in need of housing,
- Activities and sources of funds that can best meet the needs of those identified households.

Priority need rankings were assigned to households to be assisted according to the following HUD categories:

High Priority: Activities to address this need will be funded by the NDDOC during the five-year period. Identified by use of an 'H.'

Medium Priority: If funds are available, activities to address this need may be funded by the NDDOC during the five-year period. Also, the NDDOC may take other actions to help other entities locate other sources of funds. Identified by use of an 'M.'

Low Priority: The NDDOC will not directly fund activities to address this need during the five-year period, but other entities' applications for federal assistance might be supported and found to be consistent with this Plan. In order to commit CDBG, HOME or ESG Program monies to a Low Priority activity, the NDDOC would have to amend this Consolidated Plan through the formal process required by the Consolidated Plan regulations at 24 CFR Part 91. Identified by use of an 'L.'

No Such Need: The NDDOC finds there is no need or that this need is already substantially addressed. The NDDOC will not support applications for federal assistance for activities where no need has been identified. Shown by use of an 'N.'

PRIORITY NEEDS ANALYSIS AND STRATEGIES

Rankings have been assigned to each of the required categories for HUD Housing Priority Needs Table 2A, on the following page. The size of each group having unmet needs, coupled with input received at the public input meetings as well as the degree of need expressed during the 2014 Housing and Community Development Survey, guided the ranking process for the NDDOC. No groups received less than a medium need.

Table 2A
State of North Dakota
Priority Housing Needs Table for 2015-2019 Consolidated Plan

PRIORITY HOUSING NEEDS (Households)		Priority		Unmet Need
Renter	Small Related	0-30%	H	2,090
		31-50%	H	985
		51-80%	H	450
	Large Related	0-30%	H	470
		31-50%	H	345
		51-80%	H	140
	Elderly	0-30%	H	2,645
		31-50%	H	1,295
		51-80%	H	535
	All Other	0-30%	H	2,825
		31-50%	H	1,285
		51-80%	H	465
Owner	Small Related	0-30%	M	1,170
		31-50%	M	1,420
		51-80%	H	2,105
	Large Related	0-30%	H	386
		31-50%	H	315
		51-80%	H	760
	Elderly	0-30%	H	4,120
		31-50%	H	2,060
		51-80%	H	975
	All Other	0-30%	M	1,165
		31-50%	M	730
		51-80%	H	1,005
Non-Homeless Special Needs	Elderly	0-80%	H	19,355
	Frail Elderly	0-80%	H	19,955
	Severe Mental Illness	0-80%	H	172[22]
	Disability	0-80%	H	8,666
	Alcohol/Drug Abuse	0-80%	H	56[22]
	HIV/AIDS	0-80%	H	
	Victims of Domestic Violence	0-80%	H	88[22]

[22] 2014 North Dakota Statewide CoC homeless count

F. Homeless Needs Assessment

Homeless Overview

According to HUD, a national focus on homeless rights during the Reagan administration helped to form much of the way homeless needs are addressed today. During the early 1980s, the administration determined that the needs of the homeless were best handled on a state or local level rather than a national level. In 1983, a federal task force was created to aid local and regional agencies in their attempts to resolve homeless needs, and in 1986, the Urgent Relief for the Homeless Act was introduced, which chiefly established basic emergency supplies for homeless persons such as food, healthcare and shelter. The act was later renamed the McKinney-Vento Act, after the death of one of its chief legislative sponsors, and was signed into law in 1987.

HUD has historically defined the term "homeless" according to the McKinney-Vento Act, which states that a person is considered homeless if he/she lacks a fixed, regular and adequate night-time residence. A person is also considered homeless if he/she has a primary night time residence that is:

- A supervised publicly or privately operated shelter designed to provide temporary living accommodations.
- An institution that provides a temporary residence for individuals intended to be institutionalized.
- A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.[23]

Within this context, homelessness can be defined as the absence of a safe, decent, stable place to live. A person who has no such place to live stays wherever he or she can find space, such as an emergency shelter, an abandoned building, a car, an alley or any other such place not meant for human habitation.

Homeless sub-populations tend to include those with substance abuse and dependency issues, those with serious mental illness, persons living with HIV/AIDS, women and other victims of domestic violence, emancipated youth, and veterans.

The recent rise in homeless population finds cause in many areas. These include declines in personal incomes, losing jobs, the lack of affordable housing for precariously-housed families and individuals who may be only a paycheck or two away from eviction. It takes only one additional personal setback to precipitate a crisis that would cause homelessness for those at risk of homelessness. Furthermore, deinstitutionalization of patients from psychiatric hospitals without adequate community clinic and affordable housing support creates situations primed for homelessness. Personal vulnerabilities also have increased, with more people facing substance abuse problems, diminished job prospects, or health difficulties while lacking medical coverage.

[23] The term "homeless individual" does not include any individual imprisoned or otherwise detained pursuant to an Act of Congress or a state law (42 U.S.C. § 11302(c)). HUD also considers individuals and families living in overcrowded conditions to be "at risk" for homelessness.

Satisfying the needs of the homeless population therefore represents both a significant public policy challenge as well as a complex problem due to the range of physical, emotional and mental service needs required.

HEARTH ACT

On May 20, 2009, President Obama signed into law a bill to reauthorize HUD's McKinney-Vento Homeless Assistance Programs. The McKinney-Vento reauthorization provisions are identical to the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH) Act. The HEARTH Act was included by amendment to the Helping Families Save Their Homes Act.

Due to the HEARTH Act, HUD's homeless assistance programs now place greater emphasis on homeless prevention and rapid re-housing, especially for homeless families and continued emphasis on creating permanent supporting housing for people experiencing chronic homelessness. Additionally, rural communities now have the option to apply for funding under different guidelines, which offer more flexibility for the unique circumstances of rural homelessness.

Additionally, HUD's definition of homelessness has changed; it now includes those at imminent risk of homelessness. HUD previously defined homelessness more narrowly as persons in literal homeless situations. Immanent risk of homelessness now includes situations where a person must leave his or her current housing within the next 14 days, with no other place to go and no resources or support networks to obtain housing.

The Emergency Shelter Grant is now known as the Emergency Solutions Grant (ESG), signifying the grant program's ability to fund homeless prevention and re-housing programs, as well as traditional emergency shelters. The HEARTH Act authorized programs such as, short- or medium-term rental assistance, legal services, credit repair, final month's rental assistance, moving or relocation activities, and stabilization services may now be funded using ESG funds. At least 40 percent of ESG funds now must be dedicated to prevention and re-housing activities, although grantees do not have to reduce financial support for traditional shelter and outreach services previously using ESG funds. [24]

In December, 2011, HUD continued its implementation of the HEARTH Act by proposing standards related to Homeless Management Information Systems (HMIS). These proposed standards would provide for: uniform technical requirements of HMIS, consistent collection of data and maintenance of the database, and confidentiality of the information in the database.[25]

Homeless Prevention and Rapid Re-housing Program

The American Recovery and Reinvestment act of 2009 was signed into law by President Obama, on February 17, 2009. It included $1.5 billion for a Homeless Prevention Fund called the Homeless Prevention and Rapid Re-housing Program (HPRP). Allocation of

[24] National Alliance to End Homelessness, www.endhomelessness.org
[25] https://www.onecpd.info/resource/1967/hearth-proposed-rule-for-hmis-requirements/

HPRP funds are based on the same formula used to allocate the Emergency Solutions Grants (ESG) program. HPRP was intended to provide financial assistance and services to either prevent individuals and families from becoming homeless or help those who are experiencing homelessness to be quickly re-housing and stabilized. The program ended on September 30, 2012. HPRP funds are no longer available.

Rapid Re-housing and Housing First

Rapid Re-housing is a model of addressing homelessness that is aimed at moving a family or individual experiencing homelessness into permanent housing as quickly as possible. Short to medium term rental assistance is offered to persons to combat short-term financial crises.[26] Funding for rapid re-housing is available through Emergency Solutions Grants (ESG) and Continuum of Care (CoC) Programs.

There has been a recent trend in homeless prevention toward Housing First. This approach to homelessness provides permanent housing options as quickly as possible, before providing supportive services to retain the housing. The theory behind Housing First is that housing provides the foundation necessary for individual recovery and stability. Housing is offered with minimum barriers, such as sobriety or income. This is a move away from the Transitional Housing approach that provides temporary housing accompanied with, and dependent upon consuming supportive services. Housing First utilizes a standard lease agreement without requiring participation in supportive services. This tactic may reduce costs by reducing the amount of assistance to individuals and families that require minimal support to regain self-sufficiency.[27] However, it has some complicating features that may make it difficult to house people or keep them housed. Capacity to meet need is severely limited, much the same with other approaches, leaving much of the need unattended. In addition, communication and coordination among different service agencies remains crucial to serving those most in need.

NORTH DAKOTA CONTINUUM OF CARE

HUD refocused national homeless efforts through advocation of Continuum of Care programs for homeless needs. According to HUD, a Continuum of Care (CoC) exists to serve the needs of homeless persons on city or county levels. The main goals of CoCs are to offer housing assistance, support programs and shelter services to homeless persons and to ultimately break the cycle of homelessness. CoCs collaborate with different community organizations and local homeless advocate groups to identify homeless needs on a community level and in turn develop the best means of addressing these issues and optimize self-sufficiency.[28] For example, a CoC in one area may identify a high number of homeless persons with HIV/AIDS who have no access to support programs. The CoC could then tailor their efforts to offer programs that would benefit this group.

[26] http://www.endhomelessness.org/library/entry/rapid-re-housing-a-history-and-core-components
[27] http://www.endhomelessness.org/pages/housing_first
[28] https://www.onecpd.info/coc/

There is one Continuum of Care in the State of North Dakota, the North Dakota Statewide CoC. The North Dakota Coalition for Homeless People (NDCHP) is a non-profit organization comprised of agencies that serve homeless populations. The NDCHP is the lead entity of the North Dakota CoC. Eight regional coalitions carry out the work of the statewide CoC at the local level. At least one representative from each regional collation serves on the CoC Development Committee.

POPULATION

Compiling accurate homeless counts is a complex challenge faced by communities across the nation. The most common method used to count homeless persons is a point-in-time count. The North Dakota CoC relies on point-in-time surveys to count the number of homeless individuals and families in the state. Point-in-time counts involve counting all the people who are literally homeless on a given day or series of days and are designed to be statistically reliable and produce unduplicated numbers.

However, the National Coalition for the Homeless has pointed out that because point-in-time studies give just a "snapshot" picture of homelessness, they may miss people who are homeless at other times during the year. Other people may be missed because they are not in places researchers can easily find. These unsheltered or “hidden” homeless may be living in automobiles or campgrounds, for instance, or doubling up temporarily with relatives, friends, or others. Additionally, may counts rely on persons accessing services on the day of the count, which many homeless persons may not utilize on an on-going basis.

Despite the limitations, the point-in-time counts done by the North Dakota CoC provides a helpful estimation of the homeless population in the state. It was estimated that 1,258 persons were homeless in the state in 2014, as shown in Table V.6. This is compared to the 2,069 persons estimated to be homeless in the state in 2013.

Table V.6
Homeless Point in Time Count
North Dakota Statewide CoC
US Department of Housing and Urban Development

Status	2006	2007	2008	2009	2010	2011	2012	2013	2014
Emergency Shelter	321	405	394	487	461	415	474	540	639
Transitional Housing	216	172	202	278	307	145	161	134	155
Total in Shelter	537	577	596	765	768	560	635	674	794
Unsheltered	77	59	19	8	31	43	53	1,395	464
Total Homeless	**614**	**636**	**615**	**773**	**799**	**603**	**688**	**2,069**	**1,258**

In 2014, some 63.1 percent of the counted homeless population was sheltered throughout the state. Some 32.6 percent of the homeless population was sheltered in 2013. There was a large increase in unsheltered homeless starting in 2013, but this may be due to a change in the method utilized for the point-in-time count.

The point-in-time counts also gathered additional data household type, veteran status, and subpopulation information for each homeless person counted. As seen in Table V.7, there

were 120 persons in households with at least one adult and one child in the State of North Dakota during the 2014 count. Of these households, 73.3 percent were sheltered. There were an additional three households with only children. Some 68.6 percent of households without children were sheltered during the count.

Table V.7
Homeless Count 2014
North Dakota Statewide CoC
US Department of Housing and Urban Development

Household Type	Emergency Shelter	Transitional Housing	Unsheltered	Total
Households without Children	439	84	239	762
Persons in households without children	439	84	360	883
Households with at least one adult and one child	63	25	32	120
Persons in households with at least one adult and one child	200	68	104	372
Households with only children	0	3	0	3
Persons in households with only children	0	3	0	3
Total Homeless	**639**	**155**	**464**	**1,258**

Information about the various homeless subpopulations was collected during the 2014 count. Data was collected regarding the following six subpopulations:

- Chronically homeless
- Severely Mentally Ill
- Chronic Substance Abuse
- Veterans
- Persons with HIV/AIDS
- Victims of Domestic Violence

Table V.8
Homeless Subpopulations 2014
North Dakota Statewide CoC
U.S. Department of Housing and Urban Development

Homeless Attributes	Sheltered	Unsheltered	Total
Chronically Homeless Individuals	97	14	111
Chronically Homeless Persons in Families	4	0	4
Severely Mentally Ill	156	16	172
Chronic Substance Abuse	44	12	56
Veterans	117	34	151
HIV/AIDS	0	0	0
Victims of Domestic Violence	76	12	88
Persons not otherwise classified	300	376	672
Total Homeless Persons	794	464	1,258

Table V.8 shows the various subpopulations for the homeless within the state. The largest subpopulation group was those with severe mental illness, with 172 persons. The next largest subpopulation group was veterans. There were 151 veterans counted in 2014, accounting for 12 percent of the total homeless population. Veterans were sheltered at a rate of 77.5 percent during the count. According to the Department of Housing and Urban Development's 2013 Annual Homeless Assessment Report, veterans account for just over 12 percent of all homeless adults in the United States, with an average of 60 percent being sheltered during 2013 counts across the nation.[29]

[29] https://www.onecpd.info/resources/documents/ahar-2013-part1.pdf

The State's Point-in-time count was also broken down by region. This count includes persons who are unsheltered, in emergency or transitional housing, as well as those who are doubled up with family or friends and those in treatment facilities and hospitals. Region 3 held the largest proportion of the total homeless population, accounting for 31.3 percent in 2014. Almost 95 percent of those counted as homeless in Region 3, however, were doubled up. By contrast, region 5, containing 19.3 percent of the State's homeless population, included almost 94 percent of its homeless population in emergency shelters or transitional housing. Region 7 included 188 households, or over 78 percent, in emergency or transitional housing and 32 households unsheltered. Region 1's homeless population was 100 percent unsheltered at the time of the count. Region 4's homeless population is mainly in emergency shelters, with almost 92 percent of households.

Table V.9
Homeless Population by Region
North Dakota
NDDOC

Region	Households	Percentage of Total
Region 1	209	16.0%
Region 2	31	2.4%
Region 3	410	31.3%
Region 4	161	12.3%
Region 5	253	19.3%
Region 6	3	0.2%
Region 7	241	18.4%
Region 8	1	0.1%
Total	1309	100.0%

SERVICES

Table V.10
Homeless Service Organizations in North Dakota
State of North Dakota
U.S. Department of Housing and Urban Development

Homeless Service Organization	City
West Central Human Service Center	Bismarck
Lake Region Human Service Center	Devils Lake
Badlands Humans Services	Dickinson
South East Human Service Center	Fargo
North East Human Service Center	Grand Forks
South Central Human Service Center	Jamestown
North Central Human Service Center	Minot
North West Human Service Center	Williston

There are currently a number of organizations in the State of North Dakota that offer a variety of services to both aid those who have become homeless and to prevent persons from becoming homeless. A partial list of the organizations providing services to the homeless population is provided in Table V.10. Services to aid the homeless include: health clinics, housing referrals, addiction aid, employment readiness skills training, domestic/sexual abuse support, and veteran support.

FACILITIES

According to information from the North Dakota Statewide CoC and the US Department of Housing and Urban Development, there are a number of facilities within the state that offer shelter and facilities to homeless persons in North Dakota. Organizations offering shelter facilities to homeless persons are listed in Table V.11, on the following page.

Table V.11
Homeless Shelters and Emergency Housing
North Dakota Statewide CoC
U.S. Department of Housing and Urban Development

Agency	Description	City
Abused Adult Resource Center	Emergency Shelter for Mixed Populations	Bismarck
Community Violence & Intervention Center	Emergency Shelter for Mixed Populations	Grand Forks
Domestic Violence and Abuse Center	Emergency Shelter for Mixed Populations	Grafton
Domestic Violence Crisis Center	Emergency Shelter for Mixed Populations	Minot
Mercer County Women's Action	Emergency Shelter for Mixed Populations	Beulah
Red River Valley Community Action	Emergency Shelter for Mixed Populations	Grand Forks
Ruth Meiers Hospitality House	Emergency Shelter for Mixed Populations	Bismarck
Women's Alliance	Emergency Shelter for Mixed Populations	Devils Lake
YMCA Cass Clay	Emergency Shelter for Mixed Populations	Fargo
Abused Persons Outreach Center	Emergency Shelter for Adult Individuals	Valley City
City of Fargo	Emergency Shelter for Adult Individuals	Fargo
Fraser Ltd.	Emergency Shelter for Adult Individuals	Fargo
Hearts of Hope	Emergency Shelter for Adult Individuals	Belcourt
Kedish House	Emergency Shelter for Adult Individuals	Ellendale
Minot Area Homeless Coalition	Emergency Shelter for Adult Individuals	Minot
New Life Center	Emergency Shelter for Adult Individuals	Fargo
North Dakota Association for the Disabled	Emergency Shelter for Adult Individuals	Fargo
Northland Rescue Mission	Emergency Shelter for Adult Individuals	Grand Forks
Parshall Resource Center	Emergency Shelter for Adult Individuals	Parshall
Ruth Meiers Hospitality House	Emergency Shelter for Adult Individuals	Bismarck
Safe Alternatives For Abused Families	Emergency Shelter for Adult Individuals	Devils Lake
Welcome Home	Emergency Shelter for Adult Individuals	Bismarck
YMCA Minot	Emergency Shelter for Adult Individuals	Minot
Community Violence Intervention Center	Transitional Housing for Families	Grand Forks
St. Joseph Social Care	Transitional Housing for Families	Grand Forks
Turtle Mountain Housing Authority	Transitional Housing for Families	Belcourt
Abused Adult Resource Center	Transitional Housing for Mixed Populations	Bismarck
YMCA Cass Clay	Transitional Housing for Mixed Populations	Fargo
Centre Inc.	Transitional Housing for Adult Individuals	Fargo
Ruth Meiers Hospitality House	Transitional Housing for Adult Individuals	Fargo
Youthworks	Transitional Housing for Adult Individuals	Bismarck
Prairie Harvest Foundation	Permanent Supportive Housing for Families	Grand Forks
Red River Valley Community Action	Permanent Supportive Housing for Families	Grand Forks
ShareHouse/ Sister's Path	Permanent Supportive Housing for Families	Fargo
YMCA Cass Clay	Permanent Supportive Housing for Mixed	Fargo
Burleigh County Housing Authority	Permanent Supportive Housing for Adult Ind	Bismarck
Centre Inc.	Permanent Supportive Housing for Adult Ind	Fargo
Fargo Housing & Redevelopment Authority	Permanent Supportive Housing for Adult Ind	Fargo
Grand Forks Housing Authority	Permanent Supportive Housing for Adult Ind	Grand Forks
Grand Lodge of ND IOOF	Permanent Supportive Housing for Adult Ind	Devils Lake
ND Division of Community Service	Permanent Supportive Housing for Adult Ind	Bismarck
North Dakota Association for the Disabled	Permanent Supportive Housing for Adult Ind	Minot
Prairie Harvest Foundation	Permanent Supportive Housing for Adult Ind	Grand Forks
Ruth Meiers Hospitality House	Permanent Supportive Housing for Adult Ind	Bismarck
YMCA Minot	Permanent Supportive Housing for Adult Ind	Minot
The Salvation Army - Devils Lake	Rapid Rehousing for Families	Devils Lake
The Salvation Army - Fargo	Rapid Rehousing for Families	Fargo
The Salvation Army - Grand Forks	Rapid Rehousing for Families	Grand Forks
The Salvation Army - Dickinson	Rapid Rehousing for Adult Individuals	Dickinson

The Housing and Community Development Survey asked stakeholder respondents in North Dakota to identify the need for additional services and facilities for this population. Table V.12 shows that over 56 percent of respondents rated the need for services and facilities for homeless persons at a medium or high need.

Table V.12
Please rate the need for services and facilities for each of the following special needs groups.
Non-Entitlement Areas of North Dakota
2014 Housing and Community Development Survey

Question	No Need	Low Need	Medium Need	High Need	Missing	Total
Homeless persons	6	27	45	82	63	223

Additionally, the Housing and Community Development Survey asked about the need for various housing types that serve the various special needs groups, including the homeless population. As seen in Table V.13 respondents indicated the highest need for emergency shelters, followed by transitional housing.

Table V.13
Please rate the need for the following housing types for special needs populations
Non-Entitlement Areas of North Dakota
2014 Housing and Community Development Survey

Question	No Need	Low Need	Medium Need	High Need	Missing	Total
Emergency shelters	3	22	52	82	64	223
Transitional housing	5	21	73	60	64	223
Shelters for youth	5	32	63	55	68	223
Rapid rehousing rental assistance for homeless households	6	36	58	55	68	223

G. Non-Homeless Special Needs Assessment

According to HUD, special needs populations are "not homeless but require supportive housing, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify."[30] Because individuals in these groups face unique housing challenges and are vulnerable to becoming homeless, a variety of support services are needed in order for them to achieve and maintain a suitable and stable living environment. Each of these special needs populations will be discussed in terms of their size and characteristics, services and housing currently provided, and services and housing still needed.

A portion of the 2014 Housing and Community Development Survey asked respondents to rank the need for services and facilities for non-homeless special needs groups in North Dakota. The responses to this question are tabulated in Table V.14. While most special needs groups were perceived to have a high level of need, victims of domestic violence were perceived as having the highest level of need. Homeless persons, persons with substance abuse addiction and veterans were also identified as having high levels of need for facilities and services.

[30] *Consolidated Plan Final Rule 24 CFR Part 91.* United States Department of Housing and Urban Development. Community Planning and Development. 1995. 14.

Table V.14
Please rate the need for services and facilities for each of the following special needs groups.
Non-Entitlement Areas of North Dakota
2015 Housing and Community Development Survey

Question	No Need	Low Need	Medium Need	High Need	Missing	Total
Victims of domestic violence	2	10	64	84	63	223
Homeless persons	6	27	45	82	63	223
Persons with substance abuse addictions	2	20	56	78	67	223
Veterans	1	16	66	76	64	223
The frail elderly (age 85+)	1	16	69	73	64	223
Persons with severe mental illness	3	22	65	67	66	223
The elderly (age 65+)	1	16	84	59	63	223
Persons with physical disabilities	2	23	77	55	66	223
Persons with developmental disabilities	3	30	73	48	69	223
Persons recently released from prison	6	41	63	46	67	223
Persons with HIV/AIDS	8	69	61	13	72	223
Other groups	5	2			216	223

ELDERLY AND FRAIL ELDERLY PERSONS

HUD provides a definition of "elderly" as persons age 62 or older. The U.S. National Center for Health Statistics (NCHS) notes that a number of older citizens have limitations caused by chronic conditions that constrain activities of daily living (ADLs). ADLs are divided into three levels, from basic to advanced. Basic ADLs involve personal care and include tasks such as eating, bathing, dressing, using the toilet, and getting in or out of bed or a chair. Intermediate, or instrumental, Activities of Daily Living (IADLs) are tasks necessary for independent functioning in the community. These include cooking, cleaning, laundry, shopping, using the telephone, using or accessing transportation, taking medicines, and managing money. Social, recreational and occupational activities that greatly affect the individual's quality of life are Advanced Activities of Daily Living (AADL). Playing bridge, bowling, doing crafts, or volunteering for one's church are examples of advanced ADLs. "Frail elderly" is defined as persons who are unable to perform three or more activities of daily living.[31]

Size and Characteristics

According to 2010 Census Bureau data, 97,477 residents in North Dakota were age 65 or older. Table V.15 presents a breakdown of the elderly population by age North Dakota at the time of the 2010 census. While elderly is defined as persons over 62, "extra elderly" persons are those over the age of 75. Within the elderly population in non-entitlement areas of North Dakota, 51.9 percent were extra elderly. The elderly population in non-entitlement areas of North Dakota grew 3.2 percent between 2000 and 2010. The two age groups with the greatest growth over this decade were those aged 65 to 66 and those aged 85 or older, with an increase of 20.5 percent and 13.3 percent, respectively.

[31] http://law.justia.com/us/cfr/title24/24-4.0.2.1.12.2.3.2.html

Table V.15
Elderly Population by Age
State of North Dakota
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
65 to 66	9,382	9.9%	11,302	11.6%	20.5%
67 to 69	13,760	14.6%	14,726	15.1%	7.0%
70 to 74	22,759	24.1%	20,845	21.4%	-8.4%
75 to 79	19,085	20.2%	18,368	18.8%	-3.8%
80 to 84	14,766	15.6%	15,548	16.0%	5.3%
85 or Older	14,726	15.6%	16,688	17.1%	13.3%
Total	**94,478**	**100.0%**	**97,477**	**100.0%**	**3.2%**

Services and Housing Currently Provided

The Older Americans Act of 1965 has been the main instrument for delivering social services to senior citizens in the U.S. This Act established the federal Administration on Aging (AoA) and related state agencies to specifically address the many needs of the elderly U.S. population. Despite limited resources and funding, the mission of the Older Americans Act is broad: "to help older people maintain maximum independence in their homes and communities and to promote a continuum of care for the vulnerable elderly. "[32] The AoA encompasses a variety of services aimed at the elderly population, such as supportive services, nutrition services, family caregiver support, and disease prevention and health promotion.

In North Dakota, support for the elderly population is provided by the State's Aging Services Division, within the Department of Human Services. The Department of Human Services administers programs and services that help older adults and people with physical disabilities to live safely and productively in the least restrictive, appropriate setting.[33] Some of the programs for seniors include assisted living services, family caregiver support program, home and community-based care, and the Aging and Disability Resource-LINK, which connects older adults and people with disabilities to care options.

Services and Housing Needed

The Aging Services Division released a report entitled The Graying of North Dakota 2000-2020 in 2008.[34] The report identified a number of challenges facing the State as the population ages. The challenges for the future included:

- Addressing healthy aging through disease prevention and health promotion.
- Continuing to support the needs of family caregivers.
- Providing an array of quality long-term care options, especially home and community-based services which many people report they prefer.
- Addressing the mental health needs of older persons.

[32] http://www.nhpf.org/library/the-basics/Basics_OlderAmericansAct_02-23-12.pdf
[33] http://www.nd.gov/dhs/services/adultsaging/
[34] http://www.nd.gov/dhs/info/pubs/docs/aging/dn425-graying-of-nd-brochure-2008.pdf

- Providing consumers and their families easier access to services through information and development of "one stop shop" programs.
- Addressing the issue of the direct care service workforce and the value of older workers.

According to the Center for Housing Policy, housing will be a priority need for the elderly population. A growing number of older households will face severe housing costs burdens, and many will require assisted or long-term care housing and services.[35] In addition, as the Baby Boomer generation continues to grow, many will prefer to remain independent, requiring in-home services and adaptions to existing homes. Thus, there is a greater focus on in-home care and expanded home health services to meet the needs of a more independent elderly population. Because most elderly persons are on a fixed income, these increasing costs may fall on publically funded programs in the state.

PEOPLE WITH DISABILITIES (MENTAL, PHYSICAL, DEVELOPMENTAL)

HUD defines a person with a disability as any person who has a physical or mental impairment that substantially limits one or more major life activities. Physical or mental disabilities include hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS related complex, and mental retardation that substantially limits one or more major life activities. Major life activities include walking, talking, hearing, seeing, breathing, learning, performing manual tasks and caring for oneself.[36] HUD defers to Section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 for the definition of developmental disability: a severe, chronic disability of an individual that is attributable to a mental or physical impairment or combination of mental and physical impairments.

Many persons with disabilities require support services in order to maintain healthy lifestyles. The services that are required often depend on the individual and the type of disability. For example, a person with a mental disability may require medication assistance, weekly counseling sessions or job placement assistance. Specialized transport services and physical therapy sessions are services that might be required for a person with a physical disability.

Many people with disabilities live on fixed incomes and thus face financial and housing challenges similar to those of the elderly. Without a stable, affordable housing situation, persons with disabilities can find daily life challenging. In addition, patients from psychiatric hospitals and structured residential programs have a hard time transitioning back in to mainstream society without a reasonably priced and supportive living situation. The U.S. Conference of Mayors 2013 Hunger and Homeless Survey found that mental illness was cited 44 percent of the time as a cause of homelessness among unaccompanied

[35] Lipman, Barbara., Jeffery Lubell, Emily Salmon. "Housing an Aging Population: Are We Prepared?" *Center for Housing Policy* (2012). 21 May 2014 <http://www.nhc.org/media/files/AgingReport2012.pdf>.
[36] http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/disabilities/inhousing

individuals. Likewise, they reported that 30 percent of homeless adults in their cities had severe mental illness.[37]

Size and Characteristics

Data from the 2012 Five-Year American Community Survey for North Dakota showed a total population of persons with disabilities of 71,126, with an overall disability rate of 10.8 percent. Table V.18 presents a tally of disabilities by age and gender. The age group with the highest disability rate is persons aged 75 and older. Males had a slightly higher disability rate at 11.3 percent, than females, at 10.2 percent. Children under 5 had the lowest disability rate, at 0.6 percent.

Table V.16
Disability by Age
State of North Dakota
2012 Five-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	134	.6%	117	.5%	251	.6%
5 to 17	2,554	4.7%	1,385	2.7%	3,939	3.7%
18 to 34	4,639	5.3%	2,996	3.7%	7,635	4.5%
35 to 64	15,124	11.9%	11,979	9.7%	27,103	10.8%
65 to 74	6,232	27.7%	4,853	19.9%	11,085	23.7%
75 or Older	8,839	47.9%	12,274	46.2%	21,113	46.9%
Total	**37,522**	**11.3%**	**33,604**	**10.2%**	**71,126**	**10.8%**

Table V.17, below, breaks down disabilities by disability type for persons aged 5 and older, from the 2000 census data. The most common disability is a physical disability, followed by an employment disability. The third most common disability type is a go-outside-home disability.

Table V.17
Total Disabilities Tallied: Aged 5 and Older
State of North Dakota
2000 Census SF3 Data

Disability Type	Population
Sensory disability	21,523
Physical disability	41,625
Mental disability	24,616
Self-care disability	11,011
Employment disability	36,897
Go-outside-home disability	31,218
Total	**166,890**

[37] http://www.usmayors.org/pressreleases/uploads/2013/1210-report-HH.pdf

Services and Housing Currently Provided

The State's Developmental Disabilities Division and the Division of Vocational Rehabilitation have a variety of services for persons with disabilities. The Developmental Disabilities Division offers a variety of services including case management, family support and subsidies, and home health aid. The North Dakota Division of Vocational Rehabilitation's primary mission is to assist North Dakotans with disabilities to improve their employment opportunities and to assist North Dakota businesses in finding solutions to their disability-related issues.[38] Services for individuals include diagnosis and evaluation, vocational counseling and planning, information and referral, adaptive equipment, physical and mental restoration services, employment maintenance, transportation, vocations training, and job placement.

Services and Facilities Needed

The Housing and Community Development Survey also asked participants to rank the need for services and facilities for persons with disabilities. The results, shown in Table V.18, indicate a strong need for housing for both persons with physical disabilities and developmental disabilities, with over half of respondents indicating a medium to high level of need for services and facilities for both groups.

Table V.18
Please rate the need for services and facilities for each of the following special needs groups.
Non-Entitlement Areas of North Dakota
2014 Housing and Community Development Survey

Question	No Need	Low Need	Medium Need	High Need	Missing	Total
Persons with physical disabilities	2	23	77	55	66	223
Persons with developmental disabilities	3	30	73	48	69	223

People with Alcohol or other Drug Addictions

According to the National Coalition for the Homeless, for persons "just one step away from homelessness, the onset or exacerbation of an addictive disorder may provide just the catalyst to plunge them into residential instability."[39] For persons suffering from addictions to drugs and alcohol, housing is complicated. Persons who have stable housing are much better able to treat their addictions. However, obtaining stable housing while suffering from addiction can be quite difficult, and the frustrations caused by a lack of housing options may only exacerbate addictions. According to the 2013 U.S. Conference of Mayors Hunger & Homelessness Report, substance abuse is one of the most cited causes of homelessness.[40]

[38] http://www.nd.gov/dhs/dvr/index.html
[39] http://www.nationalhomeless.org/publications/facts/addiction.pdf
[40] http://www.usmayors.org/pressreleases/uploads/2013/1210-report-HH.pdf

Size and Characteristics

In 2012, the North Dakota Department of Human Services and Division of Mental Health and Substance Abuse released a report on Addiction and Substance Abuse in North Dakota.[41] This report found that 20.6 percent of residents aged 18-25 were either dependent or abused alcohol during the past year, and 6.1 percent of persons aged 26 or older. Illicit drug use was 5.0 percent for persons aged 18-25 and 1.3 percent for persons aged 26 and over. In addition, the Trust for America's Health found that North Dakota had the lowest highest rate of drug overdose mortality rate in the United States in 2013, with 3.4 per 100,000 people suffering drug overdose fatalities.[42]

Services and Housing Currently Provided

The Division of Mental Health and Substance Abuse is a part of the North Dakota Department of Human Services. The Department of Human Services' Mental Health and Substance Abuse Services Division provides leadership for the planning, development, and oversight of a system of care for children, adults, and families with severe emotional disorders, mental illness, and/or substance abuse issues.[43] The Division provides mental health and substance abuse services through eight regional human service centers and the North Dakota State Hospital in Jamestown. The Division also has the North Dakota Substance Abuse Prevention Program that provides prevention resources and education, with the mission to provide effective, innovative, quality, and culturally appropriate substance abuse prevention infrastructure, strategies and resources to the individuals and communities of North Dakota.[44]

Services and Housing Needed

According to the Healthy People 2020 national objectives, there were 22 million Americans struggling with a drug or alcohol problem in 2005. Of those with substance abuse problems, 95 percent are unaware of their problem.[45] Obtaining treatment is a primary concern for many, which often includes high costs and other impacts on the person's ability to obtain or retain an income and housing.

The National Coalition for the Homeless notes that other needs for persons living with addictions to drugs or alcohol include transportation and support services, including work programs and therapy access. Barriers also include programs that follow abstinence-only policies. These programs are often unrealistic for persons suffering from addictions because they fail to address the reality of relapses. A person living in supportive housing with an addiction problem who experiences a relapse may suddenly become a homeless person.[46]

[41] http://www.nd.gov/dhs/services/mentalhealth/prevention/pdf/2012-epi-profile.pdf
[42] http://healthyamericans.org/reports/drugabuse2013/release.php?stateid=ND
[43] http://www.nd.gov/dhs/services/mentalhealth/index.html
[44] http://www.nd.gov/dhs/services/mentalhealth/prevention/aboutus.html
[45] http://www.healthypeople.gov/2020/TopicsObjectives2020/overview.aspx?topicId=40#star
[46] http://www.nationalhomeless.org/publications/facts/addiction.pdf

Results from the 2014 Housing and Community Development Survey, presented in Table V.19, show that respondent indicated a high need level for additional services and facilities for this special needs group.

Table V.19
Please rate the need for services and facilities for each of the following special needs groups.
Non-Entitlement Areas of North Dakota
2014 Housing and Community Development Survey

Question	No Need	Low Need	Medium Need	High Need	Missing	Total
Persons with substance abuse addictions	2	20	56	78	67	223

VICTIMS OF DOMESTIC VIOLENCE

Domestic violence describes behaviors that are used by one person in a relationship to control the other. This aggressive conduct is often criminal, including physical assault, sexual abuse and stalking. The U.S. Department of Justice defines domestic violence as a pattern of abusive behavior in any relationship that is used by one partner to gain or maintain power and control over another intimate partner.[47] Victims can be of all races, ages, genders, religions, cultures, education levels and marital statuses. Victims of domestic violence are at risk of becoming homeless due to an unstable living environment. If domestic violence victims flee the home, they are often faced with finding emergency shelter and services for themselves and their children. Victims of domestic violence are predominantly women. However, children can also be affected as either victims of abuse or as witnesses to abuse. The U.S. Department of Justice found that throughout their lifetime, over 25 million women and 7 million men were victimized by an intimate partner.[48]

Size and Characteristics

Pinpointing a specific number of victims of domestic violence can be difficult because many cases go unreported. However, there are other means of gathering statistics, including tracking the numbers of cases that are reported to law enforcement. According to the statewide sexual and domestic violence coalition, CAWS North Dakota, there were 5,177 reported incidents of domestic violence in North Dakota in 2013.[49] The 2013 Point-in-Time homeless count indicated 88 homeless victims of domestic violence, accounting for 7 percent of the homeless population counted.

[47] http://www.ovw.usdoj.gov/domviolence.htm
[48] https://www.ncjrs.gov/pdffiles1/nij/183781.pdf
[49] http://cawsnorthdakota.org/wp-content/uploads/2013/11/2013-DV-Fact-Sheet.pdf

Services and Housing Currently Provided

CAWS North Dakota is a statewide sexual and domestic violence coalition that supports and presents a unified voice for the 20 crisis intervention centers across North Dakota.[51] The mission of CAWS North Dakota is to provide leadership and support in the identification, intervention and prevention of sexual and domestic violence.

Services for victims of domestic abuse are provided by a variety of non-profit and faith-based organizations across the state. Many of the shelters have 24-hour crisis lines and offer temporary housing, advocacy, referral programs, counseling, and transportation, as well as many other services. A partial list of domestic violence service providers is shown in Table V.20.

Table V.20
Domestic Violence Service Providers
State of North Dakota
CAWS North Dakota[50]

Homeless Service Organization	Location
Women's Action and Resource Center	Beulah
Abused Adult Resource Center	Bismarck
Family Crisis Center	Bottineau
Safe Alternatives for Abused Families	Devils Lake
Domestic Violence & Rape Crisis Center	Dickinson
Kedish House	Ellendale
Rape and Abuse Crisis Center	Fargo
Spirit Lake Victim Assistance	Ft. Totten
Domestic Violence and Abuse Center	Grafton
Community Violence Intervention Center	Grand Forks
S.A.F.E. Shelter	Jamestown
Abuse Resource Network	Lisbon
Domestic Violence Crisis Center	Minot
Coalition Against Violence	New Town
Domestic Violence Program of NW ND	Stanley
Hearts of Hope	Turtle Mountain Reservation
Abused Persons Outreach Center	Valley City
Three Rivers Crisis Center	Wahpeton
McLean Family Resource Center	Washburn
Family Crisis Center	Williston

Services and Housing Needed

Results from the 2014 Housing and Community Development Survey indicated a high need level for additional domestic violence facilities and services in North Dakota. These data are shown in Table V.21, below.

Table V.21
Please rate the need for services and facilities for each of the following special needs groups.
Non-Entitlement Areas of North Dakota
2014 Housing and Community Development Survey

Question	No Need	Low Need	Medium Need	High Need	Missing	Total
Victims of domestic violence	2	10	64	84	63	223

People with HIV/AIDS and Their Families

National research has demonstrated that housing is the greatest unmet service need among people living with HIV/AIDS. Part of this can be attributed to several personal and structural factors unique to this population: loss of income due to progressive inability to maintain employment, disease progression requiring accessible facilities, and policy requirements that limit residence in temporary or transitional programs. It is estimated that

[50] http://cawsnorthdakota.org/index.php/aboutus/directory/
[51] http://cawsnorthdakota.org/

as many as half of all people living with HIV/AIDS will need housing assistance at some point in their illness.[52]

In addition, homelessness is a barrier to outpatient care and HIV/AIDS specific therapies. The National Coalition for the Homeless reports that between one-third and one-half of all persons with HIV/AIDS are either homeless or at risk for becoming homeless.[53] Research shows that among people with HIV/AIDS, there is a strong correlation between housing and improved access to, ongoing engagement in, and treatment success with health care. When people are housed they can access and adhere to drug treatments and therapies, which may require fewer hospitalizations and emergency care.[54] This is partially due to the fact that complex medication regimens require that medicines be refrigerated and administered according to a strict schedule. Furthermore, homeless HIV positive individuals have a death rate that is five times greater than that of housed HIV positive people, 5.3 to 8 deaths per 100 people compared to 1 to 2 per 100 people.[55]

Size and Characteristics

The North Dakota Department of Health released the HIV, TB, STD, and Hepatitis Epidemiological Profile in 2012.[56] According to the report, there were a total of 297 persons known to be living with HIV/AIDS in 2012. From 1984 to 2012, 564 cases of HIV/AIDS were reported to the North Dakota Department of Health. Some 84 percent of all HIV/AIDS cases diagnosed in the state between 1984 and 2012 were between the ages of 20 and 49. The average HIV/AIDS incidence rate from 2008 to 2012 for blacks was 49.0 per 100,000, whereas it was 1.4 per 100,000 and 2.9 per 100,000 for whites and American Indians, respectively.

Services and Housing Currently Provided

A combination of private non-profit providers and the Department of Health's HIV Program provide HIV/AIDS services in North Dakota. The Department of Health's HIV Program includes three sections: HIV Surveillance, HIV Prevention, and Ryan White Program Part B.[57] The HIV Surveillance program is used to collect information about HIV infection and AIDS diagnoses among North Dakotan residents in order to monitor the incidence of HIV/AIDS in the state, in order to:

- Monitor the incidence and estimated prevalence of HIV/AIDS in the state.
- Assess the risks for HIV infection and develop effective HIV prevention programs.
- Develop surveillance methods to allow for a more current estimate and characterization of HIV/AIDS risks and needs.

[52] http://nationalaidshousing.org/legisadvocacy/hopwa/
[53] http://www.nationalhomeless.org/publications/facts/HIV.pdf
[54] http://nationalaidshousing.org/legisadvocacy/hopwa/
[55] http://www.nationalaidshousing.org/PDF/Housing%20&%20HIV-AIDS%20Policy%20Paper%2005.pdf
[56] http://www.ndhealth.gov/HIV/HIV%20Data/HIV_TB_STD_HEP_EPI_2012.pdf
[57] http://www.ndhealth.gov/hiv/

- Justify necessary federal and state funding to support continued HIV/AIDS prevention, services and surveillance activities.

The HIV prevention program exists in North Dakota to reduce the spread of HIV by decreasing risky behaviors which include unprotected sex, needle-sharing for drug use, or tattooing and body piercing. The HIV program is expanding the reach of HIV testing through the use of rapid HIV testing and providing new opportunities to reach people who are at risk of becoming infected with HIV. North Dakota Ryan White HIV/AIDS Program Part B assists low-income North Dakota residents living with HIV or AIDS to access confidential health and supportive services

HIV testing and services are provided by numerous public health clinics throughout the state. Free HIV testing is also provided by many non-profit organizations along with a bevy of other services, such as case management, transitional housing, housing referrals, food pantries, direct financial assistance, support groups and mental health counseling. A partial list of HIV service providers in North Dakota is provided in Table V.22, at right.

Table V.22
HIV Service Providers
State of North Dakota
North Dakota Department of Health[58]

Service Organization	Location
Southwestern District Health Unit	Beach
Upper Missouri District Health	Crosby
Bismarck-Burleigh Public Health	Bismarck
Lake Region District Health Unit	Devils Lake
Custer Family Planning	Bismarck
Community Action Partnership	Dickinson
Heartview Foundation	Bismarck
Southwestern District Health Unit	Dickinson
Ruth Meiers Hospitality House	Bismarck
Fargo Cass Public Health	Fargo
Custer House	Mandan
Grand Forks Public Health Dept.	Grand Forks
Red River Valley Community Action	Grand Forks
First District Health Unit	Minot
Valley Health	Grand Forks
Minnie Tohe Health Center	New Town
Central Valley Health District	Jamestown
Rolette Public Health District	Rolla
Upper Missouri District Health Unit	Stanley
Upper Missouri District Health	Williston
Richland County Health Department	Wahpeton

Services and Housing Needed

Persons living with HIV/AIDS have multiple needs in terms of services. In addition to receiving regular medical attention, case management, and income support, many persons need access to permanent housing solutions. According to the Department of Housing and Urban Development, 9 out of 10 persons utilizing HOPWA benefits are extremely low to low income. [59] Increased funding for housing for persons living with HIV/AIDS is one of the greatest needs of the HIV/AIDS support programs. For example, there is generally a high need for increased scattered site housing availability, because traditional assisted housing options that involve grouping funding recipients in one site or complex are ineffective in that they can endanger the confidentiality of residents. Additionally, program recipients have a need for longer-term housing options. As the treatment of AIDS has advanced, people are living longer with the disease. Thus longer-term housing options are needed. However, the funding of these long-term housing options can be expensive.

[58] https://www.ndhealth.gov/HIV/Resources/HIVResourceBook%202009.pdf
[59] https://www.onecpd.info/resources/documents/HOPWA-Fact-Sheet.pdf

As seen on Table V.23, over one third of respondents indicated a medium to high need level for services and facilities for persons with HIV/AIDS.

Table V.23
Please rate the need for services and facilities for each of the following special needs groups.
State of North Dakota
2014 Housing and Community Development Survey

Question	No Need	Low Need	Medium Need	High Need	Missing	Total
Persons with HIV/AIDS	8	69	61	13	72	223

H. Summary

There were 29,741 households below 80 percent MFI with housing need in 2011 in non-entitlement areas of the state.

Results from the 2014 Housing and Community Development Needs Survey showed that construction of new for-sale housing, construction of new rental housing, rental housing for very-low income households and homeowner housing rehabilitation were considered to have a high need for funding, along with rental housing rehabilitation and rental assistance. Comments received from public input meetings echoed these sentiments, and also indicated a need for senior-friendly housing and housing for large families.

Homeless needs in the non-entitlement area of the state are handled by the Statewide Continuum of Care organization. A count of the homeless population showed that more than 1,258 persons were homeless in 2014, including 120 homeless families with children and 115 chronically homeless persons.

Non-homeless special needs populations in the state include the elderly and frail elderly, persons living with disabilities, persons with alcohol or other drug addiction, victims of domestic violence, and persons living with HIV and their families. These populations are not homeless, but are at the risk of becoming homeless and therefore often require housing and service programs. The needs of the special needs groups are relative to the programs currently provided. The Housing and Community Development Needs Survey indicated the highest need for persons with substance abuse addiction, followed by victims of domestic violence and the frail elderly.

VI. Community Development Needs Assessment

A. Introduction

The community development needs for the state of North Dakota were determined based on research gathered from the 2014 Housing and Community Development Needs survey.

B. Community Development Needs Assessment

2014 Housing and Community Development Survey

As part of the process of evaluating community development needs in North Dakota, the 2014 Housing and Community Development Needs survey was distributed to stakeholders throughout the state. A total of 98 survey responses were received in non-entitlement areas.

Survey participants were asked to identify which funding areas they would allocate their resources to. These results are presented in Table VI.1, below, and show that most respondents would prioritize resources to housing. This was followed by public facilities, economic development, water systems, human services, infrastructure and all other.

Table VI.1
How Would You Allocate Your Resources Among These Areas?
Non-Entitlement Areas of North Dakota
2014 Housing and Community Development Survey

Area	Percentage Allocated
Housing	29.30%
Public Facilities	14.51%
Economic Development	14.32%
Water Systems	14.23%
Human Services	14.07%
Infrastructure	12.34%
All Other	1.23%
Total	**100.00%**

In terms of Business and Economic Development activities, the highest need was placed on the retention of existing businesses, followed by expansion of existing businesses. These breakdowns are shown in Table VI.2, on the following page. The next top priorities were the retention and expansion of existing businesses, attraction of new businesses and fostering businesses with higher paying jobs.

Table VI.2
Please rate the need for the following Business and Economic Development activities.
Non-Entitlement Areas of North Dakota
2014 Housing and Community Development Survey

Question	No Need	Low Need	Medium Need	High Need	Missing	Total
Retention of existing businesses	3	11	46	99	64	223
Expansion of existing businesses	3	13	53	89	65	223
Attraction of new businesses	6	20	53	80	64	223
Foster businesses with higher paying jobs	3	19	55	79	67	223
Provision of job training	2	22	65	69	65	223
Enhancement of businesses infrastructure	2	28	67	57	69	223
Provision of technical assistance for businesses	2	25	70	56	70	223
Investment as equity partners	1	33	63	55	71	223
Provision of venture capital	1	38	62	51	71	223
Provision of job re-training, such as after plant or other closures	4	42	64	45	68	223
Development of business parks	3	40	69	41	70	223
Other business activities	5	1		7	210	223

Additional question were asked about the need for infrastructure, public facilities, and public services. The following tables will illustrate the respondents ranking of various priorities.

Looking back at Table VI.1, respondents indicated that infrastructure should account for over 12 percent of resources. Water systems themselves should account for 14.23 percent of resources. Table VI.3 demonstrates the highest ranking for street and road improvements. This was followed by sewer system improvements and water system capacity improvement. The Focus Groups also indicated the need for infrastructure to accommodate growth, including streets and water systems for increased housing.

Table VI.3
Please rate the need for the following Infrastructure activities.
Non-Entitlement Areas of North Dakota
2014 Housing and Community Development Survey

Question	No Need	Low Need	Medium Need	High Need	Missing	Total
Street and road improvements	1	16	58	86	62	223
Sewer system improvements	6	27	65	58	67	223
Water system capacity improvements	7	29	62	56	69	223
Sidewalk improvements	2	38	68	49	66	223
Bicycle and walking paths	10	49	55	46	63	223
Flood drainage improvements	5	42	64	45	67	223
Storm sewer system improvements	6	38	69	42	68	223
Water quality improvements	14	41	64	38	66	223
Solid waste facility improvements	6	37	76	35	69	223
Bridge improvements	17	36	74	31	65	223
Other infrastructure activities	7	1	4	9	202	223

Community and Public facilities were also prioritized by respondents in the survey. According to allocation responses, public facilities should account for over 16 percent of resources. As seen in Table VI.4, respondents indicated the highest level of need for childcare facilities, by far. This was followed by community centers and healthcare

centers. The public input from the eight regions also echoes these sentiments, with childcare care facilities as a high priority.

Table VI.4
Please rate the need for the following community and public facilities.
Non-Entitlement Areas of North Dakota
2014 Housing and Community Development Survey

Question	No Need	Low Need	Medium Need	High Need	Missing	Total
Childcare facilities	1	3	36	121	62	223
Community centers	5	28	64	64	62	223
Healthcare facilities	6	25	63	64	65	223
Residential treatment centers	9	25	66	59	64	223
Youth centers	1	33	71	54	64	223
Parks and recreational centers	2	38	69	49	65	223
Senior centers	6	41	68	43	65	223
Public buildings with improved accessibility	4	42	66	36	75	223
Other infrastructure activities	7	1	4	9	202	223

Table VI.5, below, shows the need for human and public services. The highest needs indicated were for childcare services, mental health/chemical dependency services, and transportation services. This was followed by healthcare service, senior services, and fair housing activities.

Table VI.5
Please rate the need for the following human and public services
Non-Entitlement Areas of North Dakota
2014 Housing and Community Development Survey

Question	No Need	Low Need	Medium Need	High Need	Missing	Total
Childcare services	1	5	36	119	62	223
Mental health/chemical dependency services	1	29	48	81	64	223
Transportation services		18	65	79	61	223
Healthcare services	1	19	70	71	62	223
Senior services	1	18	73	69	62	223
Fair housing activities	4	44	54	58	63	223
Fair housing education	5	46	52	56	64	223
Youth centers	1	33	71	54	64	223
Tenant/Landlord counseling	6	48	55	52	62	223
Homebuyer education	4	39	74	43	63	223
Employment services	3	42	73	41	64	223
Crime awareness education	4	51	68	37	37	223
Mitigation of asbestos hazards	7	69	59	22	66	223
Mitigation of radon hazards	8	68	62	19	66	223
Mitigation of lead-based paint hazards	9	71	61	17	65	223
Other public services	4	2	2	4	211	223

Disaster Relief

Areas throughout the State of North Dakota were impacted by flooding. As a federally recognized disaster area, the State receives funding to address various needs, as described below.

Economic Development

Notwithstanding the continued growth in the production of oil and gas in North Dakota, and in the region surrounding Minot, the effects of the flood continue to have a negative impact on businesses and jobs inside and outside of the flood inundation zone. Inside of the flood inundation zone, we documented the case of Val's Cyclery, a business with continuing serious and visible structural repair needs to its foundation, which continued to operate despite those needs. In addition, we also documented four businesses that despite their best efforts, have, to this day, not found the resources necessary to re-open after the flood, leaving blighted and empty structures that detract from the quality of life in the neighborhoods in which they're located.

In addition to the *direct* impact on Minot's economy caused by the loss of businesses, and the jobs that depended upon them, we also have anecdotal evidence of the *indirect* effect on Minot's economy caused by the impacts of flooding in the agricultural lands upstream and downstream of Minot. Hundreds of acres of land that were farmable prior to the flood are still flooded to this day. In support of the submission of this proposal, farm and ranching equipment vendors based in Minot testified that even though the direct impact of the loss of this land is somewhere else, that there is an impact in Minot in that there are some farmers and ranchers that are not purchasing equipment and supplies and that loss of business continues to ripple through the economy.

Infrastructure

Since the time of the flood, the City of Minot has spent nearly $11 million on infrastructure repair throughout the city – these projects included everything from the repair of sewer lift stations to the removal of debris from the city storm sewer. Despite the massive progress that was made in making the City "whole" since the flood, there are still essential repair projects for which the City has yet to identify funding.

Key among those needs is the need for repairs to the levees along the Mouse River that were damaged by the flood (the SWIF program). As a result of the flood, there is still damage remaining to the flood protection system (levees and dikes) that existed before the flood to protect the city from a 100-year flood event – which means that not only can the city not protect itself at present from a repeat of the 27,000 CFS flood event that it saw in 2011, it also can't protect itself from the more modest 100 year (5,000 CFS) flood event that it had anticipated prior to 2011, and without these basic repairs, the city is extremely vulnerable. We have submitted engineering reports for repair needs for levees on the north and south banks of the river as well as a budget showing sources and uses showing a funding gap in excess of $400,000.

Another important unmet infrastructure repair need is the multiuse path along the river that connects the downtown area with neighborhoods up and down river. One element of this trail that is particularly missed is the pedestrian trail which many people used to get from North side neighborhoods into downtown – this link was particularly important for people without other forms of transportation to go shopping or to get to the downtown hub of the city's public transit system.

C. Summary

The 2014 Housing and Community Development Survey provided data on perceived community development needs. Respondents indicated that funding should be primarily devoted to housing and public facilities followed by economic development. Retention of existing businesses, expansion of existing business and attraction of new businesses were all top priorities in terms of economic development. Street and road improvements, sewer, and water system capacity improvements were high priorities for infrastructure development. Respondents noted a high need for childcare, healthcare and youth facilities, and the need for mental health/chemical dependency services, senior services, and transportation services.

VII. STRATEGIC PLAN

A. OVERVIEW OF CONSOLIDATED PLAN NATIONAL GOALS

The goals of the North Dakota Consolidated Plan are to provide decent housing, provide a suitable living environment and expand economic opportunities for its low- and moderate-income residents. The NDDOC strives to accomplish these goals by affectively maximizing and utilizing all available funding resources to conduct housing and community development activities that will serve the economically disadvantaged residents of the non-entitlement areas of the state. By addressing need and creating opportunity at the individual and neighborhood levels, the NDDOC and participating communities hope to improve the quality of life for residents. These goals are further explained as follows:

- *Provide decent housing* by helping homeless persons obtain appropriate housing and assisting those at risk of homelessness; preserving the affordable housing stock; increasing availability of permanent housing that is affordable to low- and moderate-income persons without discrimination; and increasing the supply of supportive housing.

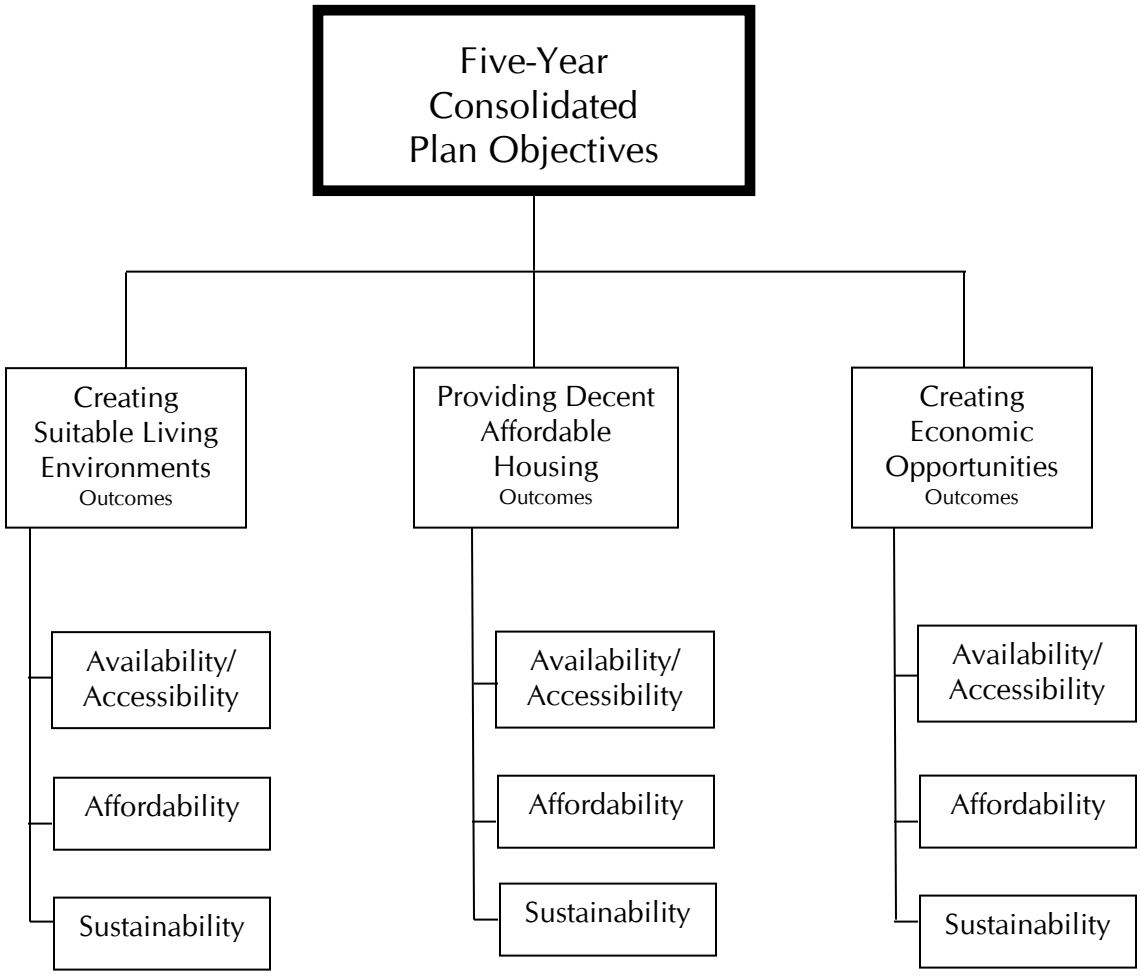
- *Provide a suitable living environment* by improving the safety and livability of neighborhoods; increasing access to quality facilities and services and infrastructure; and reducing the isolation of income groups within an area through de-concentration of low-income housing opportunities.

- *Expand economic opportunities* by creating jobs accessible to low- and moderate-income persons; making mortgage financing available for low- and moderate-income persons at reasonable rates; providing access to credit for development activities that promote long-term economic and social viability of the community; and empowering low-income persons to achieve self-sufficiency to reduce generational poverty in federally assisted and public housing.

B. Context in Which Activities will be Conducted

Performance Measurement Criteria

The results of the state's resource expenditures will be in terms that are quantifiable; in terms that are measurable; and that were originally cited as a goal. These objectives, and their outcomes, are best illustrated in the following diagram:



C. Geographic Priorities

The HOME and ESG program funds will be available to eligible applicants statewide. Fargo receives their HOME funds directly from HUD. The CDBG program is available to eligible applicants in every city and county, except the three entitlement cities of Grand Forks, Fargo, and Bismarck.

D. Priority Needs

The Strategic Plan must identify North Dakota's general priorities for activities and HUD-supported investments to address affordable housing needs; homelessness; the needs of non-homeless persons who require supportive housing and services; and non-housing community and economic development needs. These general and relative priorities will help guide HUD-supported housing and community development initiatives in North Dakota for 2015 through 2019.

The NDDOC has identified 10 priority development areas to meet the greatest needs of residents in the participating cities and non-entitlement areas of North Dakota. It will invest its CDBG, HOME, ESG, and other resources to address needs in the following priority areas:

- Low-income renter households
- Low-income Owner households
- Elderly and Frail Elderly
- Persons with Disabilities
- Special Needs Populations
- Homelessness
- Water and Wastewater systems
- Streets and Sidewalks
- Disaster Relief
- Retaining and Expanding Existing Businesses

NDDOC plans to utilize available resources, including HOME, CDBG and ESG funds to address the priority needs established in this Plan. The priorities identified in this Strategic Plan focus on meeting housing and community development needs, primarily those of low-income households and neighborhoods.

E. Influence of Market Conditions

NDDOC acknowledges that market conditions influence the way funds will be delivered and will influence the use of funds available. Below is a narrative of market characteristics that will the influence the use of funds available for housing types.

Tenant-Based Rental Assistance

As shown by the pervious sections, the demand for rental has increased and is expected to continue to increase throughout the course of this Plan. This state expects to see the need for TBRA to continue as the number of cost-burdened families continues to grow.

TBRA for Non-Homeless Special Needs

The Non-Homeless Special Needs populations within the state have a variety of housing needs throughout the state. The increase in demand for rentals and the increase in the price of rentals will place a high need for special need populations within the state. These increases make rentals unaffordable to many special needs populations.

New Unit Production

As shown by this Market Analysis section, housing production has not been keeping pace with demand, resulting in an increase in price. New unit production will increase the number of affordable units available to North Dakota households. The 2014 Housing and Community Development Survey results indicated a high level of need for new unit production, both rental and for-sale.

Rehabilitation

The state of North Dakota has seen a growth in the need for housing, and an increase in demand for rental units. This combination calls for rehabilitation of existing units, both rental and homeowner, in order to meet the needs of households throughout the state. The results of the 2014 Housing and Community Development Survey also indicated a high level of need for unit rehabilitation.

Acquisition, including preservation

As shown previously in this Plan, there are a number of subsidized units at risk of expiring. As the demand for affordable rental units continues to increase, the loss of these units will place additional households in need. This, in addition to survey results, has indicated a high level of need for preservation of affordable units.

F. Anticipated Resources

For the Strategic Plan years 2015 through 2019, the NDDOC anticipates receiving CDBG, HOME and ESG funds. Table VII.1, below, represents the anticipated resources for the State of North Dakota.

Table VII.1
Anticipated Resources
State of North Dakota

Program	Source of Funds	Expected Amount Available for Program Year 2015-16			Total
		Annual Allocation	Program Income	Prior Year Resources	
CDBG	public- federal	$3,609,246	$1,700,000	$0	$5,309,246
HOME	public- federal	$3,002,167	$11,476.26	$0	$3,013,643.25
ESG	public- federal	$445,841	$0	$0	$445,841
CDBG-DR	public- federal	$0	$0		

Leveraging

Federal funds will continue to be leveraged with nonfederal resources to achieve the objectives of this plan. Matching requirements will be achieved through a variety of methods. Grant recipients are encouraged to utilize funds from the private sector, state and local programs, and other sources to assist in meeting HUD matching requirements and to increase the amount of funds available to provide affordable housing, expand economic opportunities, improve infrastructure, and provide community facilities.

Community Development Block Grant

The Federal resources listed have limited funds available so the programs, when administered by the state, are generally designed to require the use of other funds to complete projects. For instance, all CDBG economic development projects require, by design, a 50 percent match of other funds. For CDBG public facilities projects, the Regional Councils generally require some percentage of other funds. Administrative costs that are required to be matched for the CDBG and HOME programs are included in the Division of Community Services budget.

Home Investment Partnerships Program

Applicants should use private funds, tax credits, Rural Development, Federal Home Loan Bank, CDBG, ND Housing Incentive Fund, Department of Energy, or other grant/loan programs to help leverage HOME activities.

All recipients are expected to locally meet the HOME Program match requirement of 25 percent unless specifically waived by the DCS. Existing general waivers include a state policy that homeowner rehabilitation and TBRA activities are excluded from the match requirement.

Emergency Solutions Grant Program

The State will continue to meet the ESG match requirements in the same manner as it has in past grant years. Each grant year, the State contributes $120,000 in general funds to match the federal allocation. The remaining matching funds of $325,841 are provided by ESG sub-recipients. Matching funds are used to enhance and expand eligible ESG components and sub-activities.

G. Institutional Delivery Structure

The system in place to implement the CDBG, HOME, and ESG programs is well established and permits the opportunity for close coordination to identify needs and to employ the available re-sources. The CDBG program is well coordinated through the eight Regional Planning Councils, each receiving an allocation with which to fund economic development, housing, and public facilities projects. They in turn coordinate with various housing groups, the Public Housing Authorities, local economic developers, and state agencies to use CDBG funds to fund the most cost effective and low-income targeted projects. In addition, since the Division of Community Services is located in the North Dakota Department of Commerce, the staff is able to have daily coordination with the North Dakota Economic Development and Finance Division in funding economic development projects. The Community Action Agencies are intricately involved in the implementation of the HOME program, and both coordinate housing projects with the Regional Councils. As indicated in the affordable housing goals, Councils will be partnering with Community Action Agencies to assist with lead-based paint requirements. In addition, the North Dakota Housing Finance Agency is provided a set-aside from the HOME program to assist low-income families in accessing housing. The HOME program

also coordinates closely with the entitlement cities of Grand Forks and Bismarck to address their local low-income housing needs. The ESG program works very closely with the 25 shelters in the state and the North Dakota Homeless Coalition to identify and address the needs of the homeless and the chronic homeless. At the present time we do not believe that the system has any gaps that need to be addressed.

COORDINATION

At this time we have no specific plans to enhance coordination. The CDBG program has been implemented for 32 years in the state, and the system in place provides for more than enough coordination, especially when considering the limited funds available and the continued high demands for housing rehabilitation, public facilities, and economic development. If more funds become available, some additional things might be possible, but for now the system for coordination is more than adequate. This also applies to the HOME program which has been in place for 22 years, and the ESG program which has been in place for 27 years. Working together we are very successful in identifying needs. The problem is the lack of funds to address the needs, and the ability to allocate funds across uses. Every entity involved in the implementation of the Plan does everything in its power to assure that funds are targeted to the most beneficial projects and to the most needy households and individuals.

Availability and Targeting of Services

Table VIII.2
Availability and Targeting of Services
State of North Dakota
NDDOC

Homelessness Prevention Service	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X		
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	X
Education	X	X	X
Employment and Job Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X

H. Strategic Goals of the North Dakota Consolidated Plan

The following list presents the overriding strategies of the North Dakota Five-Year Consolidated Plan for Housing and Community Development, including selected performance criteria associated with each strategy and goal. Furthermore, there may be a need to direct such housing resources by use of project selection criteria, which may be updated annually, based upon year-to-year need and local circumstances.

The strategies the state will pursue over the next five years are as follows:

Housing Strategies:

1. Preserve and improve the quality and condition of the existing rental and owner-occupied housing stock through rehabilitation of lower-income, disabled and elderly households

2. Fund homeownership opportunities for lower income residents

3. Provide funding to increase the supply of multifamily housing

Homeless Strategies:

1. Support emergency shelters and transitional housing for the homeless

2. Create additional transitional and permanent supportive housing facilities

3. Provide financial support to assist those at imminent risk of homelessness, including rapid rehousing

4. Fund homeless prevention activities, including data collection and prevention services

Non-Housing Community Development Priorities:

1. Encourage economic development opportunities that retain and expand existing businesses

2. Improve and enhance local public infrastructure, including water, sewer, streets and sidewalks

3. Encourage communities to address local public facilities and service needs

4. Encourage communities to do strategic planning

Each of the priorities identified above, as well as the objectives consistent with each strategy are discussed in greater detail below. Performance measurement criteria are presented at the end of each priority narrative.

HOUSING STRATEGIES

The population throughout North Dakota continues to increase, and this growth is occurring more quickly in certain areas of the state with dramatic economic change. The demand for quality affordable homeowner and rental housing will continue to rise along with population, but at different rates depending on the local community's economic, demographic and housing market conditions. As the State of North Dakota strives to meet the needs of its residents, housing remains a top priority.

1. Preserve and improve the quality and condition of the existing rental and owner-occupied housing stock through rehabilitation of lower-income, disabled and elderly households

NDDOC will offer funding to rehabilitation activities that address the needs of lower-income and elderly households, including rental and owner-occupied rehabilitations.

Outcome: Sustainability

Objective: Provide Decent Affordable Housing

Funding: HOME, Housing Trust Fund, CDBG

Five-Year Goal:

Rental Units Rehabilitated	Number of Household Housing Units
Homeowner Housing Rehabilitated	Number of Households Housing Units

2. Fund homeownership opportunities for lower income residents

NDDOC will offer down payment assistance to low-income households purchasing homes in high-cost areas of the state. The program will provide low-interest, deferred loans to be used for down payment and closing costs.

Outcome: Affordability

Objective: Provide Decent Affordable Housing

Funding: HOME, Housing Trust Fund

Five-Year Goal:

Direct Financial Assistance to Homebuyers	Number of Households Assisted

3. Provide funding to increase the supply of multifamily housing

NDDOC will fund eligible nonprofit and for-profit housing builders with financial subsidies for the development of rental properties affordable to low-income households.

Outcome: Availability/Accessibility

Objective: Provide Decent Affordable Housing

Funding: HOME, Housing Trust Fund, CDBG

Five-Year Goal:

Rental Units Constructed	Number of Household Housing Units

HOMELESS STRATEGIES

The State of North Dakota is committed to helping to work towards the goals of reducing and ending homelessness throughout the State by prioritizing homelessness with funding and program initiatives.

1. Support emergency shelters and transitional housing for the homeless

NDDOC will provide funding for a number of services needed by homeless persons, such as case management, health services, and outreach. Funding will also be provided to assist with shelter maintenance and operations.

Outcome: Sustainability

Objective: Create Suitable Living Environments

Funding: ESG

Five-Year Goal:

Homeless Person Overnight Shelter	Number of Persons Assisted

2. Create additional shelters, transitional and permanent supportive housing facilities

The State of North Dakota supports efforts to acquire additional housing structures for homeless shelters, transitional and permanent supportive housing in the non-entitled areas.

Outcome: Availability/Accessibility

Objective: Provide Decent Affordable Housing

Funding: ESG, CDBG

Five-Year Goal:

Overnight/Emergency Shelter/ Transitional Housing Beds added	Number of bed added

3. Provide financial support to assist those at imminent risk of homelessness, including rapid re-housing

The Department of Commerce will provide financial support, including providing rapid re-housing.

Outcome: Affordability

Objective: Create Suitable Living Environments

Funding: ESG

Five-Year Goal:

Rapid Re-housing	Number of Households Assisted

4. Fund homeless prevention activities, including data collection and prevention service

The Department of Commerce will fund prevention activities, including services and outreach for persons at imminent risk of becoming homeless.

Outcome: Sustainability

Objective: Create Suitable Living Environments

Funding: ESG

Five-Year Goal:

Homeless Prevention	Number of Persons Assisted

NON-HOUSING COMMUNITY DEVELOPMENT PRIORITIES

Throughout the state of North Dakota, there are various community development needs, including public facilities, infrastructure as well as the need for additional planning. This Plan prioritizes funds to meet those needs to serve the residents of the State.

1. Encourage economic development opportunities that retain and expand existing businesses

NDDOC will participate in funding economic development activities that retain or expand existing businesses and jobs.

Outcome: Availability/Accessibility

Objective: Create Economic Opportunities

Funding: CDBG

Five-Year Goal:

Jobs Created/Retained	Number of jobs
Businesses Assisted	Number of Businesses Assisted

2. Help improve and enhance local public infrastructure including water, sewer, streets and sidewalks

The Department of Commerce will participate in funding activities that improve the existing infrastructure through updating street, water and wastewater systems and sidewalks/paths.

Outcome: Sustainability

Objective: Create Suitable Living Environment

Funding: CDBG

Five-Year Goal:

Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit Number of households assisted

3. Encourage communities to address local public facilities and service needs

The Department of Commerce will participate in funding quality public service activities that benefit the low/mod populations throughout North Dakota.

Outcome: Availability/Accessibility

Objective: Create Suitable Living Environments

Funding: CDBG

Five-Year Goal:

Public service activities for Low/Moderate Income Housing Benefit
Number of households assisted

4. Encourage communities to do strategic planning

As part as the on-going effort to improve the quality of living environments for North Dakota residents, the Department of Commerce will provide funding for planning activities for local units of government.

Outcome: Sustainability

Objective: Create Suitable Living Environments

Funding: CDBG

Five-Year Goal:

Other: Planning Activities

5. Engage in funding disaster relief areas

As part as the on-going effort to combat the effects of flooding, NDDOC will utilize CDBG-DR funds to address these needs in affected areas throughout the state.

Outcome: Sustainability

Objective: Create Suitable Living Environments

Funding: CDBG

Five-Year Goal:

Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit Number of households assisted

I. MONITORING

Monitoring will be the responsibility of the staff assigned to the CDBG, HOME, and ESG programs and the organizations that partner with the Division of Community Services to implement these programs. This will primarily be accomplished through quarterly and final reports on each funded project. To assure long-term compliance with program requirements, staff will do on-site monitoring of files and each completed project using a systems review of the implementing organizations. Staff will also perform desk-top monitoring using drawdown requests, environmental review notices, Section 504 Self-evaluations, and the Integrated Disbursement Information System (IDIS).

APPENDIX A: CITIZEN PARTICIPATION PLAN

NORTH DAKOTA CITIZEN PARTICIPATION PLAN
Consolidated Plan for Housing and Community Development

PURPOSE

In 1994, the US Department of Housing and Urban Development issued new rules consolidating the planning, application, reporting, and citizen participation processes of four formula grant programs: Community Development Block Grants (CDBG), Home Investment Partnerships (HOME), Emergency Solutions Grants (ESG) and Housing Opportunities for Persons with AIDS (HOPWA). The new planning process was intended to more comprehensively fulfill three basic goals: to provide decent housing, to provide a suitable living environment and to expand economic opportunities.

The Consolidated Plan is actually a three-part planning process required by HUD. It comprises developing a five-year strategic plan, preparing annual action plans and submitting annual performance reports. These three parts are intended to furnish the framework whereby North Dakota can identify its housing, homeless, community, and economic development needs, identify resources that will be tapped and actions to be taken to address the needs, as well as look back and evaluate the state's progress toward achieving its strategic goals. Completing these documents on time and in a manner that is acceptable to HUD ensures program funding.

The precursor to the Consolidated Plan is the Citizen Participation Plan (CPP). The objectives of the CPP are to ensure that the citizens of North Dakota, particularly persons of low and moderate income, persons living in slum and blight areas, units of local government, housing agencies and other interested parties, are provided with the opportunity to participate in the planning and preparation of the Consolidated Plan, including amendments to the Consolidated Plan and the Annual Performance Report. In doing so, the CPP sets forth general policies and procedures for implementing and carrying out the consolidated planning process, such as how the Consolidated Plan will be developed, dates and milestones along which the process will proceed and methods for citizens to offer the state assistance and guidance in the formulation of the Plan. Furthermore, the provisions of the CPP fulfill statutory and regulatory requirements for citizen participation specified in the U.S. Department of Housing and Urban Development's rules for the Consolidated Plan, the HOME Investment Partnerships (HOME) Program, the Community Development Block Grant (CDBG) Program, the Emergency Solutions Grants (ESG) Program and the Housing Opportunities for Persons with AIDS (HOPWA) Program. In North Dakota, the North Dakota Department of Commerce, Division of Community Services is the lead agency for developing, implementing, monitoring, and reporting on the achievements of the Consolidated Plan. The Division administers CDBG, ESG, HOME and new funding that may become

available. HOPWA funds are administered by Tri-State HELP (Housing Environment for Living Positively).

The Consolidated Plan identifies the housing and community development needs of the State of North Dakota, and sets priorities for spending the HUD grant funds. Public comment is a vital component of identifying the state's housing and community development needs and spending priorities. The Consolidated Plan offers the opportunity for strategic statewide planning to occur alongside citizen participation.

COMMENT ON THE CITIZEN PARTICIPATION PLAN AND AMENDMENTS

North Dakota Department of Commerce will receive comments on the proposed Citizen Participation Plan during a 15 day comment period. In the event that there are substantial amendments to this Citizen Participation Plan, an additional comment period of at least 15 days will be allotted. This proposed Citizen Participation Plan (and, if necessary, the substantially amended Citizen Participation Plan) will be made available to the public before the 15 day comment period begins.

Individuals who require accommodations, including appropriate auxiliary aids, translated documents or interpreters to participate in a public hearing, or who would like to request a copy of the proposed Citizen Participation Plan, or another document, in an alternate format, should contact the Department of Commerce's Section 504 Coordinator, Adele Sigl via email at dcs@nd.gov or by calling 701-328-5300, TTY: 800-366-6888, Spanish TTY: 800-435-8590 or Relay ND Voice: 800-366-6889.

ENCOURAGEMENT OF CITIZEN PARTICIPATION

The Consolidated Plan is designed to enumerate North Dakota's overall strategy for coordinating federal and other housing and community development resources to provide decent housing, establish and maintain a suitable living environment, and expand economic opportunities, particularly for low and moderate income persons.

Interested groups and individuals are encouraged to provide input into all aspects of North Dakota's consolidated planning activities, from assessing needs to setting priorities through performance evaluation. By following the CPP, there will be numerous opportunities for citizens to contribute information, ideas and opinions about ways to improve our neighborhoods, promote housing affordability and enhance the delivery of public services to local residents.

Affirmative efforts to encourage and solicit participation from the state's residents and populations least likely to have awareness of HUD-funded programs and processes including low-income residents, individuals with disabilities, racial and ethnic minorities, and female-headed households shall include:

1. Advertising the details of the CPP (e.g. documents for public review, meetings, opportunities to provide feedback and comment) in the State's daily newspapers, and those daily or non-daily publications on or near the Turtle Mountain Band of Chippewa, Spirit Lake Sioux, Standing Rock Sioux, Wahpeton Sisseton Sioux, the Three Affiliated Tribes reservations and Trenton Indian Health Service Area located West of Williston, North Dakota;

2. Sending notice of the CPP (e.g. documents for public review, meetings, opportunities to provide feedback and comment) with advocacy groups, non-profit and for profit organizations, and state and community agencies that provide services to or advocate for low-income individuals, individuals with disabilities, racial and ethnic minorities and female-headed households; and

3. Posting Notifications on the DCS website.

LIMITED ENGLISH PROFICIENT PERSONS AND THE LANGUAGE ACCESS PLAN

The State of North Dakota will make every effort to ensure that Limited English Proficient (LEP) persons have meaningful access to federally funded programs and services as is required under Title VI of the Civil Rights Act of 1964.

The State of North Dakota has a diverse population where many languages are spoken. A substantial number of persons that speak these languages do not speak English or do not speak English very well and are considered Limited English Proficient (LEP).

Regardless of which language a person speaks or their ability to speak English, the State of North Dakota will make every effort to ensure that they have meaningful access to federal funding services through either oral interpretation or written translations of vital documents.

Since the State of North Dakota has a number of LEP persons, all countywide public notices and public hearings must ensure that language services are provided or available. For example, each year the public notice for the Annual Action Plan will be printed in various languages and translation services will be provided as necessary for the public hearing.

However, many programs and services delivered within the State of North Dakota, including those carried out by participating cities, have distinct service areas and, as such, an assessment must be made by each agency administering the activity to determine which language services should be provided based on the identified LEP population in the service area.

To assist participating agencies, the State of North Dakota has developed a bulletin instructing them to conduct the four-factor analysis and develop their own Language Access Plan (LAP) to ensure that LEP persons have meaningful access to their federally funded programs and services. The state will also provide technical assistance to assist the agencies in conducting the four-factor analysis and in developing their Language Access Plans.

The four-factor analysis is as follows:

> **Factor 1:** Determine the number or proportion of LEP persons served or encountered in the eligible service area.
> **Factor 2:** Determine the frequency with which LEP persons come in contact with the program.
> **Factor 3:** Determine the importance of the information, services, program, or the activity to people's lives.
> **Factor 4:** Assess costs versus resources and benefits in providing language services.

The State of North Dakota is confident that no person will be denied federally funded services based on their ability to speak English.

The State of North Dakota is committed to keeping all interested groups and individuals informed of each phase of the consolidated planning process and of activities being proposed or undertaken under HUD formula grant programs. Opportunities to comment on or participate in planning community development and affordable housing activities and projects will be publicized and disseminated throughout the state.

PUBLIC HEARINGS

Eight public hearings will be held to gather comments on the Consolidated Plan. The hearing will be held prior to drafting of the plan.

A summary of the written and oral public comments from individuals or groups received in writing or at the public meetings will be considered for the Consolidated Plan.

Venues used for interviews, focus groups, grant applications, and public meetings are fully accessible to people with disabilities that impact mobility. Should a venue not be fully accessible, the individual(s) should contact the Department of Commerce's Section 504 Coordinator, Adele Sigl via email at dcs@nd.gov or by calling 701-328-5300, TTY: 800-366-6888, Spanish TTY: 800-435-8590 or Relay ND Voice: 800-366-6889.

PUBLICATION OF CONSOLIDATED PLAN DOCUMENTS

The state will publish the draft Consolidated Plan or Annual Action Plan for public review in a manner that affords citizens, public agencies and other interested parties a reasonable

opportunity to examine its contents and submit comments. The Draft Plan will be a complete document and shall include:

- The amount of assistance the state agencies expect to receive, and
- The range of activities that may be undertaken, including the estimated amount that will benefit persons of low and moderate income.

A notice for the release of the Draft Plan will be published in several newspapers of general circulation at the beginning of the public comment period. The release will include a list of the locations where copies of the entire proposed Consolidated Plan may be obtained or examined. The following are among the locations where copies of the public comment draft will be made available for inspection:

- North Dakota Department of Commerce, Division of Community Services' offices
- Division of Community Services website: http://www.communityservices.nd.gov/

Citizens and groups may obtain a reasonable number of free copies of the proposed Consolidated Plan by contacting the Department of Commerce's Section 504 Coordinator, Adele Sigl via email at dcs@nd.gov or by calling 701-328-5300, TTY: 800-366-6888, Spanish TTY: 800-435-8590 or Relay ND Voice: 800-366-6889.

PUBLIC COMMENTS ON THE DRAFT CONSOLIDATED PLAN AND ANNUAL ACTION PLANS

One public meeting will be held in each of the State's Regional Planning Districts prior to drafting the Consolidated Plan, to gather input from citizens regarding proposed changes. Written comments and citizen participation by low and moderate income individuals, minorities, non-English speaking persons and persons with disabilities will be encouraged through the affirmative efforts outlined in the Encouragement of Citizen Participation section on page 2.
Notices of the meetings will be published in the daily newspapers across the state no less than 15 days prior to the meeting and a press release will be forwarded to all newspapers statewide. DCS will also attempt to email a copy of the notice or press release to interested parties.
The proposed Consolidated Plan will be made available to interested parties for a comment period no less than 30 days.

Along with the notification that the proposed Consolidated Plan is available for public comment, a summary of the proposed plan's contents and purpose will be published. The notification will be published on or before the day the proposed Consolidated Plan comment period begins. Locations where copies of the entire proposed plan may be obtained will also be stated in the notice.

The proposed Consolidated Plan will be available at DCS's website at www.communityservices.nd.gov/ for the full public comment period. Copies of the proposed plan will also be available from DCS during the public comment period.

PUBLIC OUTREACH

An informed citizenry is critical to effective and responsive housing and community development programs. Efforts to educate residents and empower their participation are an ongoing element of the consolidated planning process.

Public education and outreach will be facilitated through the use of public advertisements that describe the consolidated planning process, opportunities for citizen participation and available funding through the CDBG, ESG, and HOME programs.

TECHNICAL ASSISTANCE

Groups or individuals interested in obtaining technical assistance to develop project proposals or applying for funding assistance through HUD formula grant programs covered by the Consolidated Plan or Annual Action Plan may contact the staff of the North Dakota Department of Commerce, Division of Community Services. Such assistance may be of particular use to community development organizations, nonprofit service providers, and for-profit and nonprofit housing development groups that serve or represent persons of low and moderate income.

SUBSTANTIAL AMENDMENT CRITERIA FOR THE CONSOLIDATED PLAN

The following will constitute a substantial amendment to the Consolidated Plan:

1. A change in the method of distribution or grant selection criteria.

2. The addition of an activity not initially identified in the Consolidated Plan.

3. Funding of an activity not identified in the Consolidated Plan as a high or medium priority.

ADMINISTRATIVE AMENDMENTS

Administrative amendments are those that are not considered substantial in nature and pertain chiefly to minor administrative modifications of the programs. Thus they do not require in-depth citizen participation.

CITIZEN PARTICIPATION IN THE EVENT OF A SUBSTANTIAL AMENDMENT

In the event of a substantial amendment to the Consolidated Plan, the Community Services Division, depending on the nature of the amendment, will conduct at least one additional public hearing. This hearing will follow a comment period of no less than 30 days, where the proposed substantially amended Consolidated Plan will be made available to interested

parties. Citizens will be informed of the public hearing through daily newspaper notification and the state websites prior to the hearing.

Citizens will be notified of the substantially amended Consolidated Plan's availability through newspaper notification prior to the 30-day comment period. The substantially amended sections of the Consolidated Plan will be available on the Division of Community Services'website, www.communityservices.nd.gov/ for the full public comment period.

CONSIDERATION OF PUBLIC COMMENTS ON THE SUBSTANTIALLY AMENDED PLAN

In the event of substantial amendments to the Consolidated Plan, the state will openly consider any comments on the substantially amended Consolidated Plan from individuals or groups. Comments must be received in writing or at public hearings. A summary of the written and public hearing comments on the substantial amendments will be included in the amended Consolidated Plan. The final Consolidated Plan will also include a summary of all comments not accepted and their reasons for dismissal.

AMENDMENT CRITERIA FOR THE CDBG PROGRAM DISTRIBUTION STATEMENT

Amendments to Program Statement Affecting the Action Plan of the Consolidated Plan as stated in the Citizen Participation Plan for the North Dakota Consolidated Plan and Annual Performance Report.

The following information must be submitted to DCS when amending Regional Program Statements:

1. The Regional Council Board or its designated committee must approve amendments to the Regional Program Statement prior to notifying cities, counties and other interested parties.

2. All cities, counties and other interested parties in the region must be notified in writing of the intended change and allow 30 days for comment. The written notice should be sent in letter or memo form.

3. A copy of the notification must be submitted to the DCS **within 10 working days of the date of the notification**, along with a copy of the board approval and the minutes approving the amendment. **The 15-day comment period must be completed by the application/amendment deadline as stated in the most current Program Distribution Statement.**

4. Upon receipt of the intended change, DCS will forward a copy of all changes to HUD.

5. Changes to the Regional Program Statement cannot be implemented prior to the 30 day process.

What constitutes an amendment to the Action Plan? (the following are examples, but the list is not inclusive)

1. Changes to initially established grant selection criteria.

2. Funding of activities not initially identified in the annual Action Plan.

3. Funding of an activity not identified in the Plan as a high or medium priority.

Amendments to Regional Program Statement for the CDBG Program as stated in the Citizen Participation Plan for the North Dakota Consolidated Plan and Annual Performance Report.

The following information must be submitted to the DCS when amending Regional Program Statements:

1. The Regional Council Board or its designated committee must approve amendments to the Regional Program Statement prior to notifying cities, counties and other interested parties.

2. All cities, counties and other interested parties in the region must be notified in writing of the changes to be made and given 15 days to respond. The written notice should be sent in letter or memo form. **The 15-day comment period must be completed by the application/amendment deadline as stated in the most current Program Distribution Statement.**

3. Changes to the Regional Program Statement cannot be implemented prior to notifying cities, counties and other interested parties.

4. A copy of the notification must be submitted to the DCS **within 10 working days after the end of the 15-day comment period**, along with a copy of the board approval and the minutes approving the amendment. **If the notification is not submitted within the required time frame, the amendment will not be valid.**

What constitutes an amendment to the CDBG Program? (the following are examples, but the list is not inclusive)

1. Transferring money from one emphasis area to another.

2. Modifications to deadline dates.

EXCEPTION:

Transfers without Notice

1. After scoring and ranking has occurred, transfers between funding categories that are $20,000 and less can be made without public notice.
2. If a balance remains in a funding category, and not all applications received for that category were funded, an explanation must be provided why the applicant(s) were not offered the balance of the funds remaining.

3. Transfers without notice will be limited to two transfers per year.

4. The DCS must be notified of all transfers in writing within 10 days of the Board decision, along with a copy of the board approval and the minutes approving the transfer.

NOTE: This policy applies to allocation funds only. Revolving Loan funds can only be used for Economic Development projects.

AMENDMENT CRITERIA FOR THE HOME PROGRAM DISTRIBUTION STATEMENT

The state may relocate funds from one category to another, or one state recipient or subrecipient to another, because of high demand, an emergency due to a natural disaster, or determinations that performance-based measures have not been met.

State program income received by DCS may be allocated, at our discretion, for any project or activity deem necessary.

The application process for CHDOs/Nonprofits will be competitive for the first round if any funds remain, and it will be on a first-come, first-serve based needs.

CHANGES IN FEDERAL FUNDING LEVEL

Any changes in federal funding level after the Consolidated Plan and Annual Action Plan's draft comment period has expired and the resulting effect on the distribution of funds will not be considered an amendment or a substantial amendment.

ANNUAL PERFORMANCE REPORTS

Performance reports on CDBG, HOME, and ESG programs covered by the Consolidated Plan or Annual Action Plan are to be prepared by the North Dakota Department of Commerce, Division of Community Services within 90 days of the start of each program year. Draft performance reports will be made available upon written request. The draft

performance report will be available for comment for no less than 15 days, and any public comments received in writing will be reported in an addendum to the final performance report.

ACCESS TO RECORDS

To the extent allowed by law, interested citizens and organizations shall be afforded reasonable and timely access to records covering the preparation of the Consolidated Plan or Annual Action Plan, project evaluation and selection, HUD's comments on the Plan and annual performance reports. In addition, materials on formula grant programs covered by the Consolidated Plan or Annual Action Plan, including activities undertaken in the previous five years, will be made available to any member of the public who requests information. A complete file of citizen comments will also be available for review by interested parties.

COMPLAINTS AND GRIEVANCES

Citizens, administering agencies and other interested parties may submit complaints and grievances regarding the programs the North Dakota Department of Commerce, Division of Community Services administers. Complaints should be in writing, specific in their subject matter, and include facts to support allegations. The following are considered to constitute complaints to which a response is due:

- The administering agency has purportedly violated a provision of the Citizen Participation Plan;
- The administering agency has purportedly violated a provision of federal CDBG, ESG or HOME program regulations; and
- The administering agency, or any of its contractors, has purportedly engaged in questionable practices resulting in waste, fraud or mismanagement of any program funds.

Residents may also present complaints and grievances orally or in writing at the community meetings and/or public hearing. All public comments, including complaints and grievances, made either orally or in writing within the 30-day public comment period, will be included in the final Consolidated Plan or Annual Action Plan. Such complaints or grievances for CDBG, HOME, or ESG shall be directed to the Consolidated Plan representative at the Community Services Division.

TIMELY RESPONSE TO COMPLAINTS OR GRIEVANCES

Upon receipt of a written complaint, the designated representative at Community Services Division shall respond to the complainant within 15 calendar days and maintain a copy of all related correspondence, which will be subject to review.

Within 15 calendar days of receiving the complaint, the designated representative shall discuss the matter with the department manager and respond to the complainant in writing. A copy of the Community Services Division response will be transmitted, concurrently, to the complainant and to the division directors. If, due to unusual circumstances, the designated representative finds that he/she is unable to meet the prescribed time limit, the limit may be extended by written notice to the complainant. The designated representative's notice must include the reason for the extension and the date on which a response is expected to be generated, which may be based on the nature and complexity of the complaint.

Public review materials and performance reports will include data, as appropriate under confidentiality regulations, on any written complaints received and how each was resolved.

ACTIVITIES EXEMPT FROM SUBSTANTIAL AMENDMENT CITIZEN PARTICIPATION REQUIREMENTS

URGENT NEEDS

It may be necessary to amend the Consolidated Plan or Annual Action Plan in the event of an emergency such as a natural disaster. These amendments may include funding new activities and/or the reprogramming of funds including canceling activities to meet community development needs that have a particular urgency. Therefore the State of North Dakota may utilize its HOME or CDBG funds to meet an urgent need without the normal public comment period, which is otherwise required for substantial amendments.

To comply with the national objective of meeting community development needs having a particular urgency, an activity will alleviate existing conditions that the State of North Dakota certifies:

- Pose a serious and immediate threat to the health and welfare of the community;
- Are of recent origin or recently became urgent;
- The state is unable to finance the activity on its own; or
- Other resources of funding are not available to carry out the activity.

A condition will generally be considered to be of recent origin if it is developed or became critical within 18 months preceding the Community Services Division's certification.

AVAILABILITY OF THE CITIZEN PARTICIPATION PLAN (CPP)

Citizens and groups may obtain a reasonable number of free copies of the proposed CPP by contacting the Department of Commerce's Section 504 Coordinator, Adele Sigl via email at dcs@nd.gov or by calling 701-328-5300, TTY: 800-366-6888, Spanish TTY: 800-435-8590 or Relay ND Voice: 800-366-6889.

APPENDIX B: ANALYSIS OF IMPEDIMENTS

AI PURPOSE AND PROCESS

As a requirement of receiving funds under the Community Development Block Grant (CDBG), the HOME Investment Partnerships (HOME), and the Emergency Solutions Grant (ESG), entitlement jurisdictions must submit certification of affirmatively furthering fair housing to the U.S. Department of Housing and Urban Development (HUD). This certification has three elements:

Complete an Analysis of Impediments to Fair Housing Choice (AI),
Take actions to overcome the effects of any impediments identified, and
Maintain records reflecting the actions taken in response to the analysis.

In the *Fair Housing Planning Guide*, page 2-8, HUD provides a definition of impediments to fair housing choice as:

1. Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices [and]
2. Any actions, omissions, or decisions which have [this] effect.[60]

The list of protected classes included in the above definition is drawn from the federal Fair Housing Act, which was first enacted in 1968. However, state and local governments may enact fair housing laws that extend protection to other groups, and the AI is expected to address housing choice for these additional protected classes as well.

The AI process affirmatively furthers fair housing involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, and housing transactions, particularly for persons who are protected under fair housing law.

The development of an AI also includes public input and review via direct contact with stakeholders, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified impediments.

METHODOLOGY

As part of the consolidated planning process, and as a requirement for receiving HUD formula grant funding, the State of North Dakota is undertaking this AI to evaluate impediments to fair housing choice within non-entitlement areas of the state. Residents of the State of North Dakota are protected from discrimination in housing choice by the federal Fair Housing Act, which

[60] U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide*. Vol. 1, p. 2-8.
http://www.hud.gov/offices/cpd/about/conplan/fairhousingexs/Module5_TopSevenAFFH.pdf

includes protections based on race, color, religion, national origin, sex, disability, and familial status[61]. In addition, state residents are protected by North Dakota Century Code, which prohibits discrimination on all of the bases identified in the FHA, as well as discrimination based on age, marital status, or use of public assistance.[62]

The purpose of this report is to determine current impediments to fair housing choice at work in North Dakota and to suggest actions that the local community can consider in order to overcome the identified impediments. Thus, this report represents only the first step in the three-part certification process presented on the previous page.

This AI was conducted through the assessment of a number of quantitative and qualitative sources. Quantitative sources used in analyzing fair housing choice in the State of North Dakota included:

- Socio-economic and housing data from the U.S. Census Bureau,
- Employment data from the U.S. Bureau of Labor Statistics,
- Economic data from the U.S. Bureau of Economic Analysis,
- Investment data gathered in accordance with the Community Reinvestment Act,
- Home loan application data from 2004 through 2013 gathered under the Home Mortgage Disclosure Act, and
- Data concerning the 159 fair housing complaints filed HUD and the 295 filed with the North Dakota Department of Labor and Human Rights.

Qualitative research included evaluation of relevant existing fair housing research and national and state fair housing legal cases. Additionally, this research included the evaluation of information gathered from several public input opportunities conducted in relation to this AI. This also included the 2015 North Dakota Fair Housing Survey, monthly discussions with members of the Public Housing Authority and Grantee Outreach Committee, and a fair housing forum.

Geographic analyses of racial and ethnic distribution were conducted by calculating race or ethnicity as the percentage of total population and then plotting the data on a geographic map of Census tracts in the State of North Dakota. For the purposes of this AI, maps were produced for several racial and ethnic groups based on both 2000 and 2010 Census data in order to examine how the concentrations of these populations changed over time. Five-year ACS estimates from 2013 were also used for select maps.

Ultimately, a list of potential impediments was drawn from these sources and further evaluated based on HUD's definition of impediments to fair housing choice, as presented on the previous page. Potential impediments to fair housing choice present within the State were identified; along with actions the State may consider in attempting to address possible impediments.

[61] 42 U.S.C.A. §3601
[62] N.D.C.C. 24-02.5

OVERVIEW OF FINDINGS

This AI includes a review of both public and private sector housing market contexts in non-entitlement areas of the State of North Dakota to identify practices or conditions that may operate to limit fair housing choice in the State. Analysis of demographic, economic, and housing data included in that review establish the context in which housing choices are made. Demographic data indicate the sizes of racial and ethnic populations and other protected classes; economic and employment data show additional factors in influencing housing choice; and counts of housing by type, tenure, quality, and cost indicate the ability of the housing stock to meet the needs of the State's residents.

The contextual analysis described above provides a foundation for detailed review of fair housing laws, cases, studies, complaints, and public involvement data. The structure provided by local, state, and federal fair housing laws shapes the complaint and advocacy processes available in the State, as do the services provided by local, state, and federal agencies. Private sector factors in the homeownership and rental markets, such as home mortgage lending practices, have a substantial influence on fair housing choice. In the public sector, policies and practices can also significantly affect housing choice.

Complaint data and AI public involvement feedback further help define problems and possible impediments to housing choice for persons of protected classes, and confirm suspected findings from the contextual and supporting data.

Socio-Economic Context

The population of North Dakota's non-entitlement areas has grown by approximately 41,000 since 2000, or 9.2 percent. Most of that growth has come in the years since 2008; indeed, by 2010 the population was only observed to have grown by 1.4 percent since 2000. Prior to 2008, the population was relatively stable, but since that year the number of residents has grown by approximately 9,000 per year on average. Much of the growth between the 2000 and 2010 decennial Census counts was due to an increase in the population aged 55 to 64 of 46.8 percent, or around 18,700 residents. However, the state's non-entitlement areas also saw a substantial increase in the number of residents aged 20 to 34.

As the population increased, the number of white residents throughout the non-entitlement areas decreased slightly, and the number of black, American Indian, Asian, Native Hawaiian/Pacific Islander residents increased, along with those who identified their race as "Other", or themselves as belonging to two or more racial groups. However, with the exception of the American Indian population, which accounted for 6.8 percent of the population in 2010, and those who considered themselves part of two or more races, no other racial group accounted for more than 0.8 percent of the population. White residents accounted for just under 90 percent of the state's population in that year. In terms of ethnicity, Hispanic residents of all races represented 2 percent of the population in 2010, up from 1.2 percent in 2000.

In most cases, Census tracts with relatively high concentrations of American Indian residents were located in or around tribal reservation areas throughout the state in 2000 and 2010. However, there was an above-average concentration of American Indian residents in a large Census tract to the west of Williston in both years. Meanwhile, Census tracts with relatively high concentrations of Hispanic residents were distributed throughout the state, particularly in more populous areas of the state. The highest concentration of Hispanic residents was observed in one Census tract in Grafton in 2010, where nearly a quarter of residents were Hispanic.

Nearly 70,000 residents of the state's non-entitlement areas were living with disabilities in 2000, or 17.2 percent of the population. These residents accounted for nearly 30 percent of the population in one Census tract in Devil's Lake in that year. An estimated 11.3 percent of the population was living with some form of disability in 2009-2013.[63] In that year, the highest concentration of residents with disabilities was observed in a Census tract in Grafton.

Due in large part to intensive oil production in the Bakken formation, the labor market in the state's non-entitlement areas was, in aggregate, largely spared the worst of the national recession of 2007-2009. In fact, the labor force continued to grow through those years, and though growth in the total number of employed slowed, that number did not decline. Slackening growth in employment did contribute to a spike in the unemployment rate, which reached 4.2 percent in 2009. However, the unemployment rate has declined steadily since that year, thanks to redoubled growth in the labor market.

In the state as a whole, growth in the number of jobs has been dramatic in the years since 2009. As the number of jobs has grown, so has the average paycheck for workers throughout the state. In 2000, the average worker earned $36,963 at his or her job, in real 2013 dollars. By 2012 that figure had topped $55,000. However, growth in real average earnings has been subject to considerable fluctuation: in 2013, the last year for which data were available at the writing of this report, earnings per job had fallen by around $3,000. Real per capita income (PCI) in the state also fell in 2013, after three years of dramatic growth. However, it remained, at $53,182 per year, considerably higher than the national figure of $44,765 per year. Between 2000 and 2013, the share of household with incomes over $50,000 per year increased dramatically.

As a consequence of dramatic growth in earnings and incomes, the share of residents living in poverty fell from 12.0 to 10.7 percent between 2000 and 2013 in the state's non-entitlement areas. Census tracts with relatively high concentrations of poverty in 2000 and 2009-2013 were generally located in and around the state's tribal reservation areas.

The number of housing units in the state's non-entitlement areas increased by 5.9 percent between 2000 and 2010, outpacing growth in the population during that time. Owner-

[63] It is important to note that the definition of disability employed in the 2009-2013 ACS differed considerably from the definition in use in 2000. For that reason, the Census Bureau discourages direct comparison between the two where disability is concerned.

occupied units in 2010 were largely concentrated in and around more populous areas of the state, notably around Bismarck, Minot, and Fargo. Renter occupied units were more heavily concentrated in and around tribal reservation areas, but were most heavily concentrated on the Minot and Grand Forks Air Force bases. There was only a modest increase in the number of vacant housing units, and these units tended to be more highly concentrated in large rural Census tracts near the Fort Berthold and Turtle Mountain reservations. Most residents in the state's non-entitlement areas lived in single-family or apartment units

Most common type of vacant housing unit in 2010 consisted of units classified as "other vacant". These units tend to be more problematic than other types of vacant housing, since they are not available to the market place, and may contribute to blight where they are grouped in close physical proximity. Census tracts with relatively high concentrations of "other vacant" units were distributed throughout the state, but tended to cover large, rural areas. The highest concentration of "other vacant" units in 2010 appeared on the Grand Forks Air Force Base.

The number of smaller households throughout the state's non-entitlement areas grew considerably between the two Censuses as the number of larger households generally declined, contributing to a drop in the number and share of overcrowded units in the state. By 2013, the share of units that were overcrowded had fallen below 2 percent. The share of housing units with incomplete plumbing facilities also fell, while the percentage of units with incomplete kitchen facilities remained the same. There was a slight increase in the percentage of cost-burdened and severely cost-burdened households from 2000 through 2013; together, these households accounted for just under a quarter of all households in the state's non-entitlement areas from 2009-2013.

Finally, median housing costs tended to be higher in and around urban areas of the state, including Minot, Bismarck, Fargo, and Dickinson. Large, rural Census tracts with above-median housing costs tended to be located in the west of the state, though there were several tracts in the east and southeast in which housing costs were relatively high.

Fair Housing Law, Study, and Case Review

Residents of North Dakota are protected from discrimination in the housing market by laws at the federal and state level. The federal Fair Housing Act represents the foundation for fair housing law and policy in the United States, prohibiting discrimination on the basis of race, color, religion, sex, national origin, familial status, and disability. North Dakota housing discrimination law extends additional protections to state residents, prohibiting discrimination on the basis of age, marital status, or use of public assistance.

In spite of the existence of these laws, discrimination persists, though certainly no longer in a form that is as overt and obvious as it was when the laws were passed. Often, housing seekers will not know that they have been subjected to discrimination when a landlord tells them that no apartments are available (only to offer an available room to a prospective tenant of another race or ethnicity a few hours later). Such discrimination often only becomes apparent when

properties are subjected to fair housing testing: results of such testing, as reported in national studies, have consistently revealed differences in how applicants are treated when they apply for housing with similar qualifications, but with names that are stereotypically associated with members of different races and ethnicities.

However, it is discrimination on the basis of disability that represents the most common violation of the Fair Housing Act, according to national studies of fair housing complaints. In this connection, it is not surprising that the one fair housing complaint in which the Department of Justice has become involved in the state over the last ten years has concerned alleged discrimination on the basis of disability.

Though the laws that shape fair housing policy at the federal level are firmly established, and have been broadened in scope and legal force over the years, legal and regulatory actions that are currently taking place at the national level are likely to considerably impact the manner in which fair housing policy is carried out. In the first place, the Supreme Court is currently considering whether or not individuals or business can be held liable for discrimination by enacting policies that are neutral on their face, but have discriminatory effects. Such "discriminatory effects liability", a long-standing tool in fair housing enforcement, has been upheld in eleven district court decisions but has not yet been considered by the Supreme Court. If the court rules that disparate impact liability is not available under the fair housing act, that decision is likely to change fair housing enforcement profoundly.

The decision may also have an impact, albeit indirect, on HUD's affirmatively furthering fair housing requirement, since many of the cases that trigger an AFFH review by HUD are based on the perceived discriminatory effects of certain policies. However, a rule proposed by HUD in 2013 is likely to have a more direct impact. This proposed rule, which is meant to clarify the AFFH requirement for state and local jurisdictions, would do away with the AI and replace it with the Assessment of Fair Housing, among other changes. A final action on the rule, originally scheduled for December of 2014, is now slated for March of this year.

Fair Housing Structure

Fair housing services are provided to residents of North Dakota through a variety of agencies and organizations at the federal and state level. Fair housing policy is administered at the federal level by HUD, which promotes outreach and education; provides for fair housing enforcement; accepts complaints from American residents who believe that they have been subjected to unlawful discrimination; and coordinates with local fair housing agencies and organizations, providing funding and expertise. Enforcement of the state and federal fair housing laws is carried out at the state level by the North Dakota Department of Labor and Human Rights, under the auspices of the Fair Housing Assistance Program (FHAP).

Though North Dakota residents were also served in prior years by Fair Housing of the Dakotas, the organization dissolved late in 2010 following a loss of funding from HUD. Prior funding had been awarded to the organization through its participation in the Fair Housing Initiatives Program (FHIP). As of FY 2014, there have been no FHIP grantees in the state since 2010.

However, the newly-formed High Plains Fair Housing Council is available to assist residents of the state of who believe that they have been subjected to unlawful discrimination in the housing market by accepting fair housing complaints, advocating for complainants, and providing outreach and education on the subject of fair housing. The Fair Housing Council works in coordination with the School of Law at the University of North Dakota, which provides a range of legal services to those who are unable to obtain legal representation through its Housing and Employment Law Clinic.

Fair Housing in the Private Sector

Financial institutions throughout the state processed 218,000 loans and loan applications from 2004 through 2014. A majority of these were home purchase loans, and most home purchase loans were intended to finance the purchase of units in which the loan applicant intended to live. Over 51,000 loan applications were approved, and loans originated, while nearly 8,200 were denied, for a loan denial rate of 13.8 percent over the decade. Yearly denial rates fluctuated considerably during that time, peaking in 2006 at 13.9 percent and 2012 at 17.3 percent. Generally, denial rates were highest in the state's rural areas, and tended to be lower in and around more populous areas of the state.

On average, female applicants were denied loans at a rate of 16.4 percent, exceeding the denial rate for male applicants by 3.7 percentage points. However, variation among racial and ethnic groups was more pronounced: 31.8 percent of loan applications submitted by American Indian applicants were denied, compared to a denial rate of 13.0 percent for white applicants. Similarly, Hispanic applicants of all races were denied in 28.3 percent of applications, compared to a denial rate of 13.0 for non-Hispanic applicants.

A large percentage of applications were turned down due largely to credit history or unfavorable debt-to-income ratios; unsurprisingly, denial rates fell as incomes went up. However, discrepancies in denial rates for applicants of different racial and ethnic groups persisted, even among those who were similarly situated with respect to income: 9.3 percent of applications from white residents earning more than $75,000 were denied, compared to a denial rate of 24.5 percent for American Indian applicants in the same income bracket. Similarly, the denial rate for Hispanic residents earning more than $75,000 per year was, at 22.7 percent, more than double the denial rate for non-Hispanic residents in that income range.

Many applicants who were able to secure a home purchase loan were issued a loan with a relatively high interest rate. These high-cost loans, or HALs, represented 9.4 percent of all loans issued in the state's non-entitlement areas from 2004 through 2013. However, HAL rates have declined considerably since 2006, when 17.8 percent of loans were HALs. In recent years, these high cost loans have accounted for fewer than 5 percent of all owner-occupied home purchase loans. Census tracts with relatively high concentrations of HALs tended to be located in and around the state's tribal reservation areas. As one might expect, the HAL rate for American Indian applicants, at 20.5 percent, was considerably higher than the HAL rate for

white applicants. Similarly, the HAL rate for Hispanic applicants, at 12.7 percent, exceeded that of non-Hispanic applicants by 9.2 percent.

Small business lending in the state tended to target more populous urban areas, and was highly concentrated in middle- to high-income Census tracts.[64] Such tracts tended to be located in and around more populous areas of the state from 2000 through 2013, especially Bismarck, Fargo, and Grand Forks.

As was noted previously, disability tends to rank as the most common basis for complaints lodged with HUD at the national level. North Dakota was no different: the two most common complaints lodged against housing providers in the state's non-entitlement areas concerned perceived discrimination on the basis of physical and mental disabilities, each cited in 47 complaints. The next most commonly alleged motivation for discrimination was familial status, cited in 37 complaints. According to complaints lodged with HUD, discrimination in terms, conditions, or privileges relating to rental was the most common discriminatory issue identified, followed by failure to make reasonable accommodation. Among complaints considered to have cause, failure to make reasonable accommodation was the most common complaint. Though the state Department of Labor and Human Rights received considerably more complaints over the same time period, the basic overall pattern in those complaints was similar to what was observed in complaints lodged with HUD.[65]

Those fair housing complaints suggest that discrimination was more commonly perceived in rental market transactions; that perception is borne out to some degree in the responses to the private sector portion of the 2015 North Dakota Fair Housing Survey. Though awareness of questionable practices or discriminatory issues in the private housing market was generally limited, nearly a quarter of respondents were aware of such issues in the rental housing market, including refusal or reluctance to rent based on color, race, religion, or language barriers, or to families with children.

Fair Housing in the Public Sector

For the purposes of this AI, assessment of factors in the public sector that impact housing choice involved analysis of the location of publicly funded housing, a survey of local government and planning officials in the state's non-entitlement areas, and the 2014 North Dakota Fair Housing Survey.

Housing projects subsidized through a variety of HUD-funded programs were distributed throughout the state, though they were often located close to more populous areas of the state. There was not a noticeable trend toward the concentration of these units in areas with high concentrations of poverty; the same was true of housing projects funded through Low Income

[64] Income levels are defined with reference to the median family income for the metropolitan statistical area or non-metropolitan areas in which the Census tract is located. These areas are designated by the Federal Financial Institutions Examination Council.
[65] Many of those complaints were the same, having been "dually filed" with HUD and the DOLHR.

Housing Tax Credits and the Project-based Section 8 program. All three types of units tended to be more common in the eastern part of the state.

The survey of local government officials revealed that local zoning and land-use ordinances commonly included provisions defining "dwelling unit", "residential unit", and "family", though few included a definition for "disability", or any development standards concerning accessibility, beyond building codes. In addition, only four jurisdictions included provisions to promote the development of affordable housing in their local codes, and five noted that there existed potential barriers to the development of such units. Specific examples of such barriers frequently included the high cost of land and construction.

Finally, the presence of potential questionable practices or barriers to fair housing choice in the public sector was evaluated through results of the 2014 Fair Housing Survey. As had been the case with questions concerning discriminatory issues in the private sector, respondents were generally unaware of any such issues in the public sector, though over ten percent of respondents did profess to be aware of areas of concern in property tax policies and housing construction standards. However, the most salient issues for survey respondents were related to the provision of various government services: a quarter of respondents stated that they were aware of barriers to fair housing choice in this area, citing a lack of access to public transportation and the limited hours of government offices as specific examples.

Public Involvement

Efforts to promote public involvement in the AI process included the 2014 Fair Housing Survey; a fair housing forum, public agency outreach meetings; and a public comment period, during which the Housing Division sought public feedback on the findings of the AI and the actions proposed to address those findings.

Respondents to the 2014 Fair Housing Survey were largely familiar with, and supportive of, fair housing laws. However, many respondents maintained that these laws are difficult to understand or follow, and a quarter maintained that current laws needed to be changed; many respondents cited the need to expand current protections to prohibit discrimination LGBT orientation, source of income, and gender identity. More than 45 percent of respondents also felt that current enforcement of fair housing laws was insufficient.

In addition, over forty percent of respondents were aware of a process by which they could learn more about fair housing law and policy, and fifty respondents noted that they had participated in fair housing training. Nevertheless, 88 respondents felt that current levels of outreach and education were insufficient. Relatively few respondents were aware of any city or county fair housing ordinance, regulation, or plan.

Finally, in a series of meetings held from January 9th through March 13th of 2015, the Public Housing Agency and Non-Entitlement Grantee Outreach Committee discussed data gathered and compiled during the AI process, the findings based on those data, and the role that participants may play in the ongoing AI process. Participants also discussed methods and

avenues by which fair housing challenges in the state might be addressed, concluding that outreach and education should play an integral role in those efforts.

IMPEDIMENTS TO FAIR HOUSING CHOICE AND SUGGESTED ACTIONS

Private Sector Impediments, Suggested Actions, and Measurable Objectives

***Impediment 1*: Discrimination based on disability, familial status, and race.** This impediment was identified through review of complaints lodged with HUD and the North Dakota Department of Labor and Human Rights (DOLHR). Discrimination based on familial status was second only to discrimination disability-based discrimination as the most common allegation in complaints lodged with HUD, and was the third most common allegation in complaints lodged with the DOLHR. Discrimination based on race was the third most commonly cited motivation for discrimination among complaints lodged with HUD, and was second most common among DOLHR complaints.

> *Action 1.1*: Partner with the High Plains Fair Housing Center (HPFHC) and other non-profit organizations to conduct outreach and education to professionals in the housing industry on the subject of disability, familial status, and legal prohibitions on discrimination against families with children.
> *Measurable Objective 1.1*: The number of outreach and education activities conducted by the HPFHC and other organizations.
> *Action 1.2*: Partner with the DOLHR to conduct education activities to professionals in the housing industry on the subject of disability, familial status, and legal prohibitions on discrimination against families with children.
> *Measurable Objective 1.2*: The number of education activities conducted.
> *Action 1.3*: Partner with the HPFHC and other non-profit organizations to conduct outreach and education to professionals in the housing industry on the subject of disability, familial status, and racial forms of discrimination.
> *Measurable Objective 1.3*: The number of outreach and education activities conducted.
> *Action 1.4*: Partner with the DOLHR to conduct education activities to professionals in the housing industry on the subject of disability, familial status, and racial forms of discrimination.
> *Measurable Objective 1.4*: The number of education activities conducted.

***Impediment 2*: Failure to make reasonable accommodation.** This impediment was identified through review of complaints lodged with HUD and the North Dakota Department of Labor and Human Rights (DOLHR), as well as the results of the 2015 North Dakota Fair Housing Survey. Disability-based complaints were the most common complaints that HUD received from residents of the state's non-entitlement areas from 2004 through 2014, and accounted for more than half of all complaints lodged with the Department of Labor and Human Rights. Failure to make reasonable accommodation, a

discriminatory issue that uniquely impacts residents with disabilities, was the second most commonly alleged discriminatory action in HUD and DOLHR complaints.

In addition, though respondents to the 2015 Fair Housing Survey were largely unaware of questionable practices or barriers to fair housing choice in the private or public sectors, over one in ten respondents were aware of issues in the housing construction or accessible housing design fields, and those who provided additional commentary on this question maintained that neglect of ADA requirements in new construction was relatively common. Similarly, several of those who provided commentary on challenges in the public sector noted a lack of tax incentives to promote accessible development, as well as a failure on the part of construction companies to incorporate such elements in the design and construction of new units.

> *Action 2.1*: Partner with the HPFHC to conduct tests on selected newly constructed housing units and apartment complexes.
> *Measurable Objective 2.1*: The number of tests conducted and the results of those tests conducted.
> *Action 2.2*: Partner with the HPFHC, other non-profit organizations, and local ADA coordinators to conduct outreach and education to professionals in the housing construction industry on the subject of accessibility and reasonable accommodation.
> *Measurable Objective 2.2*: The number of outreach and education activities conducted by these entities.
> *Action 2.3*: Partner with the DOLHR to conduct education activities to professionals in the housing construction industry on the subject of accessibility and reasonable accommodation.
> *Measurable Objective 2.3*: The number of education activities conducted by these entities.

***Impediment 3*: Discriminatory advertising.** This impediment was identified through review of complaint data filed with the North Dakota Department of Labor and Human Rights. According to those data, complaints citing discriminatory advertising were the fourth most common among all complaints and complaints considered to have cause. More than a third of complaints that were settled or resolved, or that ended in a charge of discrimination, cited discriminatory advertising as among the discriminatory actions that housing providers had taken against them.

> *Action 3.1*: Partner with the HPFHC to conduct periodic reviews of rental housing advertisements in a variety of media (i.e., Craigslist, newspapers, etc.). Refer any discriminatory advertisements to the Department of Labor and Human Rights for investigation.
> *Measurable Objective 3.1*: The number of advertisements reviewed and discriminatory advertisements identified and referred reported by the HPFHC.

Action 3.2: Initiate or enhance public outreach, through partnership with the High Plains Fair Housing Council and through the state's online/media presence, to identify examples of discriminatory advertising and encourage state residents to report such advertising when they see it.
Measurable Objective 3.2: Number of outreach and education activities taken, the number of reported instances of discriminatory advertising reported by the HPFHC.

***Impediment 4*: American Indian and Hispanic home loan applicants tend to have higher rates of denials than white and non-Hispanic applicants.** This impediment was identified through review of data gathered under the Home Mortgage Disclosure Act (HMDA). According to those data, 31.8 percent of home loan applications submitted by American Indian applicants were denied over the ten-year period between 2004 and 2013, inclusive. By comparison, only 13 percent of applications from white residents were turned down during that same period. Similarly, the denial rate for Hispanic applicants was 22.9 percent, compared to 13 percent for non-Hispanic applicants.

Action 4.1: Convene a committee or panel; in coordination with High Plains Fair Housing and the DOLHR, and seeking participation from professionals in the home lending industry; with the goal of identifying factors that contribute to differential denial rates to American Indian and Hispanic applicants.
Action 4.1.1: Request recommendations on how to mitigate the factors contributing to higher denials rates for American Indian and Hispanic residents.
Measurable Objective 4.1: The establishment of the committee, the list of factors identified, and the recommendations developed.
Action 4.2: Working in coordination with accredited local and statewide for-profit and non-profit organizations and government agencies, enhance credit counseling and education to prospective home buyers, focusing on strategies to build credit for home purchases, in partnership with local lenders and civic institutions.
Measurable Objective 4.2.1: The number of credit counseling and education activities conducted.
Measurable Objective 4.2.2: The number of agencies and organizations contacted.

***Impediment 5*: Discrimination against public assistance income.** In spite of the fact that discrimination based on the receipt of public assistance is illegal under state law, complaint data from the DOLHR indicate that nearly twelve percent of those who filed a complaint with the agency believed that they had suffered discrimination on that basis.

Action 5.1: Contract with the HPFHC to conduct outreach and education to housing providers on the subject of public assistance, noting that discrimination based on use of public assistance is illegal under state law.
Measurable Objective 5.1: Number of outreach and education activities conducted.

Action 5.2: Coordinate with the DOLHR to conduct education activities to housing providers on the subject of public assistance, noting that discrimination based on use of public assistance is illegal under state law.
Measurable Objective 5.2: Number of education activities conducted.
Action 5.3: Contact the state attorney general and request that future materials and publications concerning landlord-tenant rights and responsibilities include an explanation of public assistance discrimination.
Measurable Objective 5.3: Record of contact with the state attorney general, and his office' response.

***Impediment 6*: Lack of understanding of fair housing law and policy.** This impediment was identified through review of responses to the 2015 North Dakota Fair Housing Survey and the discussions with the Public Housing Agency and Non-Entitlement Grantee Outreach Committee. Between a quarter and half of respondents to survey questions concerning impediments to fair housing choice in the private and public sectors responded to each question with "don't know", which may suggest a widespread lack of confidence in their own ability to identify the kinds of policies and practices that count as discriminatory. In addition, a fifth of respondents stated that they were "not familiar" with fair housing laws, and several survey respondents maintained that there was a need for more education on the subject of fair housing. This opinion was shared by participants in the February 20th meeting of the Public Housing Agency and Non-Entitlement Grantee Outreach Committee Meeting, who maintained that enhanced outreach and education should form a major part of the actions and objectives adopted to promote fair housing choice in the state.

Action 6.1: Contract with the HPFHC to conduct outreach and education to housing providers and property managers on the subject of affirmatively furthering fair housing, and what the law requires.
Measurable Objective 6.1: The number of outreach and education sessions offered and the number of attendants and participants.
Action 6.2: Establish yearly advertising and outreach activities, to take place during Fair Housing month (April), in partnership with High Plains Fair Housing Council and other non-profit organizations, the DOLHR, regional councils, homeless providers, and CDBG grantees. Such activities could include panel discussions, fair housing presentations, web-based advertising (i.e., state and local jurisdiction websites, Facebook, etc.).
Measurable Objective 6.2: Number of advertising and outreach activities established, number of interagency and public/private partnerships established, the record of materials prepared for discussions and meetings, and the number of participants in such discussions and meetings.

Public Sector Impediments, Suggested Actions, and Measurable Objectives

***Impediment 1*: Apparent shortage of accessible and visitable housing in rural North Dakota.** This impediment was identified through review of responses to the 2015 Fair Housing Survey.

> *Action 1.1*: Partner with Regional Councils and Community Action Agencies to encourage communities to apply for homeowner and renter rehabilitation funding to modify existing dwellings with the goal of expanding the supply of accessible and visitable housing in rural North Dakota.
> *Measurable Objective 1.1*: The number of communities who are contacted and encouraged to apply for rehabilitation funding and the number of communities who apply for such funding.
> *Action 1.2*: Partner with Regional Councils and Community Action Agencies to encourage communities to apply new construction funding with the goal of expanding the supply of accessible and visitable housing in rural North Dakota.
> *Measurable Objective 1.2*: The number of communities who are contacted and encouraged to apply for new construction funding and the number of communities who apply for such funding.

Impediment 2: Lack of understanding of fair housing law and duty to affirmatively further fair housing. This impediment was identified through review of responses to the 2015 North Dakota Fair Housing Survey and the discussions with the Public Housing Agency and Non-Entitlement Grantee Outreach Committee. As noted in the discussion for Private Sector Impediment 5, a large percentage of respondents answered each question with "don't know", and a fifth of respondents stated that they were "not familiar" with fair housing laws. Several survey respondents maintained that there was a need for more education on the subject of fair housing, an assessment that was shared by participants in the February 20th meeting of the Public Housing Agency and Non-Entitlement Grantee Outreach Committee Meeting, who maintained that enhanced outreach and education should form a major part of the actions and objectives adopted to promote fair housing choice in the state.

> *Action 2.1*: Partner with the DOLHR to conduct education activities for local jurisdictions and Regional Councils on behalf of local jurisdictions seeking CDBG grant funding concerning state and federal fair housing law and the certification to affirmatively further fair housing.
> *Measurable Objective 2.1*: The number of education sessions offered by the DOLHR.
> *Action 2.2*: Partner with the HPFHC to conduct outreach and education to local jurisdictions and Regional Councils on behalf of local jurisdictions seeking CDBG grant funding concerning state and federal fair housing law and the certification to affirmatively further fair housing.
> *Measurable Objective 2.2*: The number of outreach and education sessions offered by the HPFHC.

Action 2.3: Establish yearly advertising and outreach activities, to take place during Fair Housing month (April). Such activities could include panel discussions, fair housing presentations, and web-based advertising (i.e., state and local jurisdiction websites, Facebook, etc.)

Measurable Objective 2.3: Number of advertising and outreach activities established and the record of materials prepared for discussions and meetings.

Table C.1
Total Households with Housing Problems by Income and Race
Non-Entitlement Areas of North Dakota
2007–2011 HUD CHAS Data

Income	Non-Hispanic by Race/Ethnicity						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
30% HAMFI or less	12,230	110	55	2,021	0	240	205	14,861
30.1-50% HAMFI	7,370	69	25	580	4	195	195	8,438
50.1-80% HAMFI	5,965	31	60	250	0	55	60	6,421
80.1-100% HAMFI	2,340	11	15	65	0	4	35	2,470
100.1% HAMFI or more	2,560	36	10	75	0	25	25	2,731
Total	30,465	257	165	2,991	4	519	520	34,921
Without Housing Problems								
30% HAMFI or less	5,110	0	25	860	0	80	70	6,145
30.1-50% HAMFI	11,620	200	90	825	60	110	220	13,125
50.1-80% HAMFI	24,500	170	136	1,225	4	140	420	26,595
80.1-100% HAMFI	17,280	285	40	765	4	121	240	18,735
100.1% HAMFI or more	78,860	215	300	1,900	0	445	840	82,560
Total	137,370	870	591	5,575	68	896	1,790	147,160
Not Computed								
30% HAMFI or less	865	15	19	190	0	4	0	1,093
30.1-50% HAMFI	0	0	0	0	0	0	0	0
50.1-80% HAMFI	0	0	0	0	0	0	0	0
80.1-100% HAMFI	0	0	0	0	0	0	0	0
100.1% HAMFI or more	0	0	0	0	0	0	0	0
Total	865	15	19	190	0	4	0	1,093
Total								
30% HAMFI or less	18,205	125	99	3,071	0	324	275	22,099
30.1-50% HAMFI	18,990	269	115	1,405	64	305	415	21,563
50.1-80% HAMFI	30,465	201	196	1,475	4	195	480	33,016
80.1-100% HAMFI	19,620	296	55	830	4	125	275	21,205
100.1% HAMFI or more	81,420	251	310	1,975	0	470	865	85,291
Total	**168,700**	**1,142**	**775**	**8,756**	**72**	**1,419**	**2,310**	**183,174**

Table C.2
Renter-Occupied Households by Income and Family Status
Non-Entitlement Areas of North Dakota
2007–2011 HUD CHAS Data

Income	Elderly Family	Small Family	Large Family	Elderly Non-Family	Other Household	Total
Housing Problem						
30% HAMFI or less	185	2,090	470	2,460	2,825	8,030
30.1-50% HAMFI	185	985	345	1,110	1,285	3,910
50.1-80% HAMFI	155	450	140	380	465	1,590
80.1% HAMFI or more	120	100	130	185	115	650
Total	645	3,625	1,085	4,135	4,690	14,180
No Housing Problem						
30% HAMFI or less	190	665	45	1,560	1,005	3,465
30.1-50% HAMFI	405	1,420	295	1,295	1,710	5,125
50.1-80% HAMFI	580	3,065	420	1,065	4,220	9,350
80.1% HAMFI or more	905	6,395	665	1,045	5,940	14,950
Total	2,080	11,545	1,425	4,965	12,875	32,890
Not Computed						
30% HAMFI or less	4	105	10	95	200	414
30.1-50% HAMFI	0	0	0	0	0	0
50.1-80% HAMFI	0	0	0	0	0	0
80.1% HAMFI or more	0	0	0	0	0	0
Total	4	105	10	95	200	414
Total						
30% HAMFI or less	379	2,860	525	4,115	4,030	11,909
30.1-50% HAMFI	590	2,405	640	2,405	2,995	9,035
50.1-80% HAMFI	735	3,515	560	1,445	4,685	10,940
80.1% HAMFI or more	1,025	6,495	795	1,230	6,055	15,600
Total	**2,729**	**15,275**	**2,520**	**9,195**	**17,765**	**47,484**

Table C.3
Owner-Occupied Households by Income and Family Status
Non-Entitlement Areas of North Dakota
2007–2011 HUD CHAS Data

Income	Elderly Family	Small Family	Large Family	Elderly Non-Family	Other Household	Total
Housing Problem						
30% HAMFI or less	980	1,170	386	3,140	1,165	6,841
30.1-50% HAMFI	840	1,420	315	1,220	730	4,525
50.1-80% HAMFI	620	2,105	760	355	1,005	4,845
80.1% HAMFI or more	465	2,315	670	140	965	4,555
Total	2,905	7,010	2,131	4,855	3,865	20,766
No Housing Problem						
30% HAMFI or less	480	315	85	1,425	376	2,681
30.1-50% HAMFI	2,525	1,395	325	2,820	930	7,995
50.1-80% HAMFI	4,795	5,345	1,026	3,160	2,915	17,241
80.1% HAMFI or more	15,020	50,535	7,300	3,495	9,990	86,340
Total	22,820	57,590	8,736	10,900	14,211	114,257
Not Computed						
30% HAMFI or less	110	170	50	130	215	675
30.1-50% HAMFI	0	0	0	0	0	0
50.1-80% HAMFI	0	0	0	0	0	0
80.1% HAMFI or more	0	0	0	0	0	0
Total	110	170	50	130	215	675
Total						
30% HAMFI or less	1,570	1,655	521	4,695	1,756	10,197
30.1-50% HAMFI	3,365	2,815	640	4,040	1,660	12,520
50.1-80% HAMFI	5,415	7,450	1,786	3,515	3,920	22,086
80.1% HAMFI or more	15,485	52,850	7,970	3,635	10,955	90,895
Total	**25,835**	**64,770**	**10,917**	**15,885**	**18,291**	**135,698**

Table C.4
Households by Income and Family Status
Non-Entitlement Areas of North Dakota
2007–2011 HUD CHAS Data

Income	Elderly Family	Small Family	Large Family	Elderly Non-Family	Other Household	Total
Housing Problem						
30% HAMFI or less	1,165	3,260	856	5,600	3,990	14,871
30.1-50% HAMFI	1,025	2,405	660	2,330	2,015	8,435
50.1-80% HAMFI	775	2,555	900	735	1,470	6,435
80.1% HAMFI or more	585	2,415	800	325	1,080	5,205
Total	3,550	10,635	3,216	8,990	8,555	34,946
No Housing Problem						
30% HAMFI or less	670	980	130	2,985	1,381	6,146
30.1-50% HAMFI	2,930	2,815	620	4,115	2,640	13,120
50.1-80% HAMFI	5,375	8,410	1,446	4,225	7,135	26,591
80.1% HAMFI or more	15,925	56,930	7,965	4,540	15,930	101,290
Total	24,900	69,135	10,161	15,865	27,086	147,147
Not Computed						
30% HAMFI or less	114	275	60	225	415	1,089
30.1-50% HAMFI	0	0	0	0	0	0
50.1-80% HAMFI	0	0	0	0	0	0
80.1% HAMFI or more	0	0	0	0	0	0
Total	114	275	60	225	415	1,089
Total						
30% HAMFI or less	1,949	4,515	1,046	8,810	5,786	22,106
30.1-50% HAMFI	3,955	5,220	1,280	6,445	4,655	21,555
50.1-80% HAMFI	6,150	10,965	2,346	4,960	8,605	33,026
80.1% HAMFI or more	16,510	59,345	8,765	4,865	17,010	106,495
Total	**28,564**	**80,045**	**13,437**	**25,080**	**36,056**	**183,182**

APPENDIX D: PUBLIC INVOLVEMENT PROCESS

The public involvement process followed the requirements specified in the Citizen Participation Plan, as noted in Appendix A. However, the following narrative and exhibits provide additional information about the outreach, notification, and public involvement opportunities offered to the citizen of North Dakota in the development of the 2015-2020 North Dakota Consolidated Plan for Housing and Community Development.

The following section are notes from the eight regional Public Hearings:

REGION 1

Housing Community Development Needs – Region 1

- Lack of funding
- Access to funding – income limits
- Cost of developing housing – no cash flow
- Building materials very high and labor costs
- Banks – short term loans
- No housing for essential service workers
- Communities are doubling in size
- Retirees are staying – no starter homes in area
- Banks are very conservative. Must live in community for at least one year and huge downpayments.
- HIF to expand to include a category for just essential service workers (without 140% AMI)
- Lack of qualified developers for affordable housing.
- High price of land
- Subpar contractors
- Oilfield housing tied to employment – job gone – housing gone
- No enforcement with overcrowding living conditions – apartments
- City of Williston – doing housing study
- No homeless shelter
- Need affordable assisted living and nursing homes

Fair Housing Needs – Region 1

- Background issues – criminal – sex offender – no housing
- Lack of Section 8 vouchers
- Lack of education for property managers
- Fair market rents limits too low
- Health and safety issues not addressed in apartments
- Landlord education
- Language barriers
- Tenants will not complain for fear of losing housing

Non-housing Community Development Needs – Region 1

- Lack of funding

- Income limits
- Cities do not qualify - income
- Tioga/Crosby – highest teacher starting salary in state. Don't qualify for HIF
- Lack of infrastructure – housing and commercial
- Teacher situation will get worse as people retire
- Banks are very conservative
- 40-45% downpayments
- No real estate agents
- $320 sq ft construction costs for the new Tioga school
- Divide County – no enforcement of building codes and policies
- High construction costs for commercial
- Lack of developers to develop without guaranteed leases
- Lack of capacity – employees – in communities and non-profits, CAPS, Regional Councils
- Employee turnover rate is high
- ER visits to hospital have quadrupled in Tioga in last 3 years
- Tioga Hospital – bad debt has gone from 300,000 to 1.2 million
- Crosby hospital put ATM machine in
- Lack of 1st responder care – Tioga volunteer
- Tioga – all city funds spent or committed – lack of leadership
- Lack of 1st responders and EMTs region wide
- Need for planning and zoning
    - Education of new members
- Day care – paying $12-15 starting wage
- Lack of day care
- Lack of day care staffing
- Lack of preschool

REGION 2

Housing Community Development Needs – Region 2

- Lack of funding
- Income limits too low
- Affordability to use Section 8 vouchers. Waiting list over one year
- Fair market rents too low
- More funding for rental assistance and security deposits
- Need affordable housing
- More housing for essential service workers
- Construction costs very high
- Criminal background and/or bad credit
- Need homeless shelter for families and others
- Need temporary, transitional and permanent supportive housing
- Rehab project funding
- HOME program rules – more flexibility

Fair Housing Needs – Region 2

- Landlord education
- Renter education
- Service animals education
- Some landlords keep security deposits
- Health and safety issues with rental units
- Renters stay quiet for fear of losing housing
- No enforcement on rental property
- Language barriers
- Immigration issues – lack of resources

Non-housing Community Development Needs – Region 2

- Lack of funding
- ESG – guidelines not flexible
- Lack of infrastructure for commercial and housing development
- Income limits – temp. increase would help
- Expand public transportation
- HOME Program Regs - difficult
- Small cities – no comprehensive plans
- Statewide planning funds
- Lack of daycare
  - Quality
  - Cost
  - Employees
  - Schedules
  - Qualified directors
- Lack of addiction and mental illness counseling

REGION 3

Housing Community Development Needs – Region 3

- Lack of funding
- Affordable housing – rents and security deposits have increased
- Income limits too low
- Housing stock has deteriorated
  - New construction cost high
- Need housing rehab
- Labor shortage
- No emergency shelter
  - Staffing
  - Operating costs
  - No social detox
- Health and safety issues on rental properties

- Small communities – issues with tax credits

Fair Housing Needs – Region 3

- Landlord/renter education
  - Economic status
  - Racial
- Hotels/motels will not take individuals needing assistance
- Sexual orientation

Non-housing Community Development Needs – Region 3

- Lack of funds
- Lack of infrastructure-housing and commercial
- Child poverty went up to 50% - Benson Co
- Multiple pockets of poverty in region
- Lack of contractors
- Labor shortage
- Detox center - lacking
- Need rehab and renovation of community buildings
- Need fire department buildings and equipment
- Need ambulance buildings and equipment
- Main streets need work – building and small businesses
- Child care shortage in Towner Co
- Lack of child care staff
- One child care center closing would create a crisis in Devils Lake and Rugby
- Operating and maintenance expenses
- Hospitals and tribal college are subsidizing child care
- Tribal college has early head start and head start
- Environmental health issues in housing
- Meeting – Dept of Commerce, Rural Development, Regional Councils, Community Action Agencies and BND and others to brainstorm on how projects can be done

REGION 4

Housing Community Development Needs – Region 4

- Affordable Housing
  - $225,000 or less housing needs
- Small communities need single and multifamily housing
- Simplify programs to help for funding
- State should simplify HOME
- Cost of housing construction high
- Accessible housing difficult to find
- Tax credit rents are higher than payment standards for voucher program
- 550 people on Section 8 waiting list

- Need more funding
- Hard to find contractors for rehab
- Transitional housing for sex offenders and criminal background
- Funding for supportive services, addiction services, permanent supportive housing
- Need to preserve the housing already in place
- More access to Continuum of Care funding

Fair Housing Needs – Region 4

- Discrimination against New Americans and families with children
- Is it possible to have a fair housing staff or agency within state government? Vendor relationship with another state agency.
- Landlord/tenant education
- Health and safety issues with rental properties
- More funding for High Plains public relations
- Longer stays in shelters
- Won't rent even with guarantee of payment
- Is there a federal level fair housing non-profit organization

Non-housing Community Development Needs – Region 4

- Simplify HOME regulations
    - What used to take $20,000 now takes $60,000 for the same family
- Lack of funding
- Lack of contractors
- Use $1,000,000 of HOME to fund a project
    - One source of funds on a project instead of multiple sources
    - Use next pot of funds for the next project
- Need state to support CDBG & HOME
- Extend the Impact fund statewide
- Change CDLF rules
- HOME funds – when funding a non-profit it should be a grant not a loan.
- Ask HUD to change the CDBG formula
- Task force to meet with Congressionals to change policy

REGION 5

Housing Community Development Needs – Region 5

- Lack of funding
- Rehab – single family and multi-family
- Affordable senior housing
    - Disabled and homeless and special needs
    - Along with supportive services
- Rehab - $25,000 limit – does not meet need for lead abatement. Need to increase. $35,000-40,000 at least.

- Fargo has about 540 housing units. Two-year waiting period.
- Period of affordability (HOME – CAPS can make their own rules, was changed to a statewide rule)

Fair Housing Issues – Region 5

- Poor credit resulting from bad situation
  600 credit score – Region 5
- No secure entry
- Criminal background – not just felonies
- Domestic violence charge
- Being held to a higher standard
- Longer stays in shelters
- Won't rent even with guarantee of payment

Non-housing Community Development Needs – Region 5

- Lack of $
- Water and sewer infrastructure
- Removal of architectural barriers

REGION 6

Housing Community Development Needs – Region 6

- Lack of funding
- Affordable housing in small communities –
  - Not large complexes
  - For essential service people and low income
- More money for Section 8 vouchers
- Rehab – single family and multi-family
- Supportive housing and services tied to it
- Housing Plan for homeless individuals (needs)
- Homeless Shelter

Fair Housing – Region 6

- Landlord education
- Renter education
- Race and disability and cultural discrimination
- Service animals
- Credit barriers
- Rental history
- Criminal background
- Language barriers
- Education $ for landlords and renters

Non-housing Community Development Needs – Region 6

- Use CDBG for technical assistance for housing development (train housing developers)
- Public transportation for LMI elderly population
- Child care – working families
- Fire Hall
- Sanitary sewer lines
- Removal of architectural barriers
- Senior Center Rehabilitation
- Watermains
- Service lines
- New American support
    - Homebuyer
    - Maintenance
    - Budgeting
    - Education
- Building code education
- Property owner education on New Americans
- More $ for Fair Housing Activities
- Job Training
- Planning $
- Raise the $10,000 cost per job for infrastructure (Economic Development)
- System to notify LMI families of disasters

REGION 7

Housing Community Development Needs – Region 7

- Lack of funding
- Lack of affordable housing and low income housing
- No housing choice and Section 8 – 3 year wait
- Accessible housing
    - Architectural barriers
- Need more emergency shelters
- Fair market rents too low
- Income limits too low
- As renters leave, rents are raised; not affordable
- Incentive for builders or landlords to have units available for low income
- Time limit for voucher not long enough- finding a suitable apartment
- Supportive services lacking
- Lack of funding for deposits, first month rent, last month rent-too much
- Lack of affordable housing for larger families
- Rural communities need affordable housing
- Lack of housing for mental disabilities
- Lack of affordable assisted living rural and Bismarck

- People migrating to Bismarck from western ND – need more supportive services

Fair Housing – Region 7

- Service animals
- Renter and landlord education
- Native American and cultural discrimination
    - Elderly
    - Disabled
- Language barriers
- Criminal background

Non-housing Community Development Needs – Region 7

- Lack of funding
- Lack of childcare
    - Expense
    - Drop-in facilities
    - Evenings/weekends
- Public transportation
    - Evenings
- Prescription assistance
- Lack of staffing for rural assisted properties
- Lack of mental health services
    - Addiction services
- Rural communities cautious of incentives

REGION 8

Housing Community Development Needs – Region 8

- Lack of funding.
- Affordable housing:
    - HUD guidelines not keeping up
    - Fair market rents
    - Income limits
- $18.00 minimum wage in Dickinson
- Lack of homeless housing or shelter
    - Hotels are expensive
- Buildings available for homeless shelter– too many rules or NIMBYSM
- Last year of church shelter volunteers burned out!
- Lack of housing for essential service workers
- HIF needs to align with developers and builders
- HIF definition of essential service workers needs to be broadened
- Include subsidy in HIF program
- Section 8 – 1-2 years waiting list

    - Group working on obtaining funding with state $
    - Would be limited to oil impact areas
- Adjust median income/examined at least yearly
- FHA insured loan for area is $271,000 – needs to be adjusted
- Need transitional housing
- 40% of school children homeless (Watford City)
    - Affects Federal funding
    - Income limits for free and reduced meals needs adjusting
- Program assistance to help gap between low income and unable to qualify for programs

Fair Housing – Region 8

- Language barriers
- Landlord – renting places not fit for human habitation
- Lack of education, disconnect of info available for renters
    - No central connecting point

Non-housing Community Development Needs – Region 8

- Lack of funding
- Mental health services
    - In-patient services
    - Addiction counseling
    - Out-patient services
- No public transportation – long distance
- Taxi service expensive
- Transit – $75-125 per trip long distance
- Emergency services lacking
    - Ambulance
    - Paramedics – cost

- Dunn County Emergency Services Budget
    - From 237,000 to 1.2 million over 3 years
    - 1 FTE to 7 FTEs
- Lack of skilled workforce – even at entry level
- Daycare – high cost and shortage
- Supportive services for childcare
- $15-18 per hour starting wage for childcare workers
- Adjust median income
- Cities do not have matching $
- Water and sewer expansion
- Small $ with huge rules
- Lower scale audit review
- Education system impacted
- Commerce needs to have a tool for "can you afford to live here" – tell the Bakken story as it relates to housing.

The following pages represent a sample of comments from focus groups and public input opportunities undertaken during the planning process. Complete transcripts are available upon request from the Department of Commerce.

AFFORDABLE HOUSING FOCUS GROUP MINUTES

Comment 1: What I am seeing with this significant growth in the non-entitlement areas is related to and a lot of people can probably jump in on it too. It the demand is pushing up the cost of the land and the infrastructure and the amount of the availability of the contractor to do the work during construction season basically is pricing people out of the housing market. So with the increase in the population it isn't matching the increased growth in the wages. So there is a lot of pressure in the households right now. There are a lot of people hurting because of the increase.

Rob Gaudin: When you say hurting, you are saying they are spending too much on housing?

Comment 2: Too much on housing and the cost of food and clothing is also high in these areas. So they are a paycheck away from being homeless.

Rob Gaudin: I assume they elected to move there for economic opportunity?

Comment 3: There is economic opportunity as well as an existing population which was 672 and they are getting squeezed.

Comment 4: Anything new that is being built right now that is market-rate. Market-rate now has skyrocketed as you have heard I am sure. The affordable market is getting more and more limited as far as that goes. Anybody coming in new they are not going to, they are going to have to move into the new units that are market-rate. So those that are left behind still are not going to have affordable units available to them.

Comment 5: The flipside to that is if they are not moving into new units they are probably living in units that are substandard that you wouldn't have lived in before, but you don't have a choice and because of the demand you don't have to fix it up.

Rob Gaudin: That is the case when they buy the substandard units?

Comment 6: Or rent it.

Rob Gaudin: In your opinion what can you characterize what is a substandard unit?

Comment 7: Dirty, mold, maybe not enough room, it hasn't been updated. You are living in conditions when not everything is functioning. If you are renting and you complain there is somebody willing to take that space to have something over their heads?

Rob Gaudin: So there is also, what I am hearing you say is that there is also some abuse from landlords in this situation.

Comment 8: Neglect.

Comment 9: Neglected that is a good term.

Comment 10: There has been an increase in what he was saying is cost burdened of North Dakota. We had published something in the beginning of 2013, which used the 2012 ACS numbers of cost burdened North Dakotans and it was like 28 percent or something like that. Last week I went online to find that number again and now it is at 38.6 percent. So a 10 percent increase in a year of cost burdened households in North Dakota and there is 41 percent in Burleigh County. That is a huge number.

Rob Gaudin: You are correct about that. The ACS is a five-year rolling average so the data I have is 2012 and it shows a significantly lower rate and we will get to that in a moment.

(Presentation)

Comment 11: I think that there were quite a few articles in the paper about the number of births and I think the schools being more and more overcrowded. I would say 5 to 19 would have an increase at this pointy.

Comment 12: I think that that is outdated information.

Rob Gaudin: What about 65 and older?

Comment 13: I think it is outdated as well.

Rob Gaudin: So it is no longer declining. It is increasing?

Comment 14: I would say it is probably pretty flat. A lot of the elderly if they are in oil country they are probably moving out of oil country. If they can't find anything in the eastern part of the state they are moving out, because they have no place else to go that would be affordable for them to live.

Rob Gaudin: So, if we look at that group. These folks here are declining and that is 85 and older and maybe they are too old to go.

(Laughter)

Rob Gaudin: With 85 and older there is a higher incidence of daily living being limited. So they have a higher propensity for needing services.

Comment 15: The other opportunity we have right now is that in a lot of these areas they can sell their homes, if they are homeowners for far more than they ever thought they could sell it. Then move away. Right now the value of homes is so high. That is the other part of losing this age bracket. If they plan to move south or do anything likes this for weather.

Rob Gaudin: Now would be the time.

Comment 16: That is what we are seeing too.

Rob Gaudin: What I am hearing you say is this elderly bracket will continue to stay the same or decline. So demands for senior housing are not as strong?

Comment 17: In our region we have seen them renting a place for $250 a month and within a year it went from $250 to $2,000. So all of a sudden they are gone to either the eastern part of the state or out of the state period. A lot of them have.

Rob Gaudin: So the demand for senior housing is that?

Comment 18: I would say that it is not declining. Even though you may have a small decrease in population. You still have a significant population of seniors in the state that are on a fixed income and can't afford to live in the Northwest corridor and even in Fargo out waitlist for affordable housing you don't have to market any of them. So the demand for affordable senior housing is high in all the communities even if the population decreases, because a lot of the seniors are on fixed incomes.

Comment 19: How many of them would come back if there was affordable housing?

Rob Gaudin: You think they would come back.

Comment 20: I think so.

(Presentation)

Comment 21: Not anymore. I think that that is outdated too. I think we have had more families move in.

Rob Gaudin: More families mean three to four people. You draw that from?

Comment 22: Workers coming into the area and they didn't have enough housing. When more housing becomes available they are able to move their families into the area and some of them are doing that. After this week some of them are leaving.

Rob Gaudin: Now that you have brought that up. What do you think of the price of oil? How is that going to affect things this year?

Comment 23: It is just my personal opinion from what the people I have talked to in the areas and certainly you probably have more information. I think we are going to get a breather here in a few months and then it is going to go back up and then sustained. It was a little scare and maybe it was needed so everybody can just step back and say let's do what we need to do. It is not going to go away.

Comment 24: We are so far behind on production of housing whether it is multifamily, whether it is affordable, even market-rate. We are so far behind on having that housing built that having oil prices stay down there for a while it is, but if it stays down there for six months them we are going

to start having a problem. If it is down for the first couple of months of the year here and then it starts going back up, it is not even really a blip on our radar screen.

Rob Gaudin: Let's take a look at that. It has been falling for seven months and it continues to fall.

Comment 25: Somebody is going to shut the tap off. I mean Russia is going to collapse. If it goes down to $30 a barrel, Russia the economy is going to collapse. That is not going to happen. They are going to shut of the tap and drive that price back up before that happens. So whatever scare tacit, but I don't perceive it to continually to drop below $40 or $30 dollars a barrel. If it does we are all in trouble and worldwide and not just North Dakota.

Rob Gaudin: The consumer would think that that would be wonderful.

Comment 26: The uninformed consumer would think that would be wonderful.

Comment 27: It would certainly help boast Christmas sales.

(Laughter)

Comment 28: I think people who support it they are thinking 2015 will be a slower year and that is it. They are not thinking oh man, we are done at all.

Comment 29: Even if it goes back to 690,000 or 80,000 population trend, the $7 million dollars are resource to spend on the demand before it even took off and the need. There wasn't enough resource to meet the need. So my thinking is the people we all serve are still going to have the need. Communities, West Fargo, Fargo, Bismarck and the larger communities and if everybody else tanks that there is still a need for affordable housing and the resources that are available are not enough to meet that demand even at a population of 670,000.

Comment 30: The biggest thing is that it was before the boom. The boom just magnifies it.

Rob Gaudin: So it is more difficult for those people?

(Presentation)

Comment 31: The state has how many unfilled jobs right now? So there is the capacity there for whatever declining oil prices will have on smaller producers and smaller fringe companies to close of downsize. There should be capacity here to absorb significant number of those employees. What should, I wouldn't see a spike in unemployment rates.

Rob Gaudin: Typically when there is a slowdown in the economy the labor force will also fall. So unemployment rate could continue to fall even though there are fewer people working. That would be my expectation those who are not residing here permanently are a part of this labor force would depart. So they are not in the residents that we saw a moment ago.

(Presentation)

Comment 32: What is accounting for the drop in the last year?

Rob Gaudin: That is just what is in the data. It is also in his data.

Comment 33: Does anybody else find that kind of interesting?

Comment 34: I think that because of all the new (Inaudible) was created in the last few years.

(Banter)

(Presentation)

Comment 35: Did you pull any static on the severity of the poverty? We have less people in poverty, but are they? What people are seeing is that there is more of a discrepancy between the haves and the have-nots. The middle class has gone away a little bit more. So is there people that are in poverty are they in severe poverty like 5 to 10 of the average of median income verses the average?

Rob Gaudin: I don't have those data in front of me, but poverty rate is presented by Census tract by the state.

(Presentation)

Comment 36: I would think that those poverty rates are very skewed, because that two or three years there that the tribal members I would think that the poverty was less…

Comment 37: I agree with what you said. Even though that rate may be lower, the gap is bigger and the poverty is harsher. I don't know how you reflect that.

Comment 38: Even when you look at the decrease it is still 47,000 residents of the state. There are 47,000 people that are still in poverty households and that are a lot.

Rob Gaudin: That is correct.

Comment 39: We have limited services for anyone in poverty in this state. They are limited and the access to help them. Especially in the areas that we are showing.

Rob Gaudin: So when you are saying there is nothing, there is nothing.

Comment 40: Pretty close to that.

Rob Gaudin: Pretty close.

Comment 41: You talk to people that are moving in here for jobs and different things. There is not a supper served here every night. We don't have any food banks for the different meals for so much of our communities. Our old concept was that if you had someone that was homeless then you send them to Fargo. Then Fargo fills up. How do we handle those types of needs and address those. That is why we have people sleeping in cars and different things. We don't have shelters or anything to say. If you are poor then you have to leave the state if you are truly.

Rob Gaudin: This particular set is released by the 2012 Census and that is still other vacant typically is also high. This include foreclosed homes, so that might be contributing way, but what has happened to those homes?

Comment 46: Are those units in smaller communities where the tenants can't get supportive services so they are not and they are sitting vacant?

Rob Gaudin: There are all in the non-entitled areas. So they would be in smaller communities.

Comment 47: And that is total units, right?

Rob Gaudin: Total units, yes.

Comment 48: That seems high.

Comment 49: It is hard to find any big news in western North Dakota.

Rob Gaudin: These are regional and not so much in the west.

Comment 50: That started spreading across the state. Every community is having issues with needed more housing. So I am just very surprised by that. Other than properties that are in foreclosure and I don't know if we have that many of those. I'd say it must be flood, but you said that was 2010. So that wouldn't reflect those issues.

Comment 51: I would say that the number is if you look at the small rural communities. I am from Streeter, North Dakota originally and 150 people, there are a lot of empty homes in Streeter, but who is going to go there at this point.

Comment 52: They are vacant maybe because an elderly person owns it and they haven't given it up and they have moved into the town.

Comment 53: That is what I think is reflecting.

Comment 54: They are abandoned at this point.

Comment 55: But they don't want to sell their home because they might go back.

Comment 56: It could be out-migration for these small towns moving to bigger cities. They just leave the property empty or it is for sale, but that said that it is not on the market.

Comment 57: Why put it on the market when there is nobody to buy it.

Comment 58: The houses are 800 square feet and they are 200 years old and nobody wants to live in them so they just stay vacant. The owners moved to the nursing home or whatever.

Comment 59: That could be a part of the ageing population. If somebody moves out of their house and into a nursing home and into assisted living and their house is just sitting there and they haven't sold it and it is just sitting there.

Rob Gaudin: So given that a portion of these are in geographic areas that are not desirable. So there is really not a resource we can tap like rehab.

Comment 60: There is no rehab money anyway.

(Laughter)

Rob Gaudin: You are from the Housing Authority. Why is that?

Comment 61: There are no resources. We are building additional units.

(Presentation)

Comment 62: I think there is such a back log. Even market-rate is waitlisted. We are not even talking occupancy. We are looking at financials for apartment buildings. We are not even looking at a rate you put in it. A vacancy rate you put in, but you are going to get 100 percent. We have 91 units and we have had three months of vacancies total. Not three apartments, just three months, so three apartments three times for one month. There is such a waitlist for getting into all of these units whether it is multi-family or single family that until it slows down enough to where there is not a waitlist any more people are still going to build and they are going to continue to build until we start to see some of these occupancies in some of these multifamily getting in at 10 to 15 percent vacancy rates.

Comment 63: So much of our housing structure was not invested for so long that there is such a huge need. Possibly have a demand now and that is why we have it. What was in some of these communities was so poor that at some point that if we have people that live in and they want something that they want new housing.

Comment 64: I think there needs to be a balance. Certainly you need new, but you can't forget about the existing housing stock and the Regional Councils have done a great job going out and identifying a lot of rural development projects to upgrade and there is more that need it. It is not just rural development. Why would you let that existing stock just become that bad housing we talked about if there is such a need. So there has to be a balance between that new build and maintaining whether it is low interest loans to help fix them up. All of these are owned by non-profit boards that were created just to do that. I think we need to look at that at the same time as new builds.

Rob Gaudin: Many of the communities that we have worked for in the past have characterized by the problem that you have talked about, they really couldn't build anything new. So what you are saying is now that there is new found wealth that they are building for past demand.

(Presentation)

Comment 65: There have been rumblings that homes have been staying on the markets a little bit longer right now in conversations I have had in communities.

Comment 66: I think that if there was a prolongs with the oil industry we would see some of these and some of the other factors coming in. It is going to stay relatively the same. I don't think that it is

going to continue to increase and certainly not at the rate that it did increase, but right now I think that one of the biggest driving factors is labor. The cost of labor to do this whether it is the infrastructure or it is the construction all these are getting top dollar. Obviously anyone that is doing market-rate that they are getting as much as they can in the profit margin. So I think it will slow down a little bit, but I don't think and I think it is going to stay in the $200,000 dollar range.

(Presentation)

Comment 67: You can't have one without the other.

Rob Gaudin: Let's say that we are in an existing city with an existing water and sewer system and what can we have then? We can have a new house. What would be the most important thing for an existing community? I am going to say that housing is based on this.

(Presentation)

Comment 68: Exactly, the states unofficially position to address the housing crisis has been to focus on inventory and not focus on for example rental subsidies for individuals. They will focus on catching up even before the boom and especially now. So it is new.

Rob Gaudin: Building inventory and not rehabbing.

Comment 69: Unless it is at risk of losing its affordability. That is true.

Comment 70: Right. It is uninhabitable now or inhabited but at risk. So it is probably 90/10 as far as the percentage of what the focus is with new construction verses rehab. It is inventory that is focused on.

Rob Gaudin: So all the investment is inventory for affordable inventory. How do you define inventory?

Comment 71: Depending upon the income of who we are focused on. Just the standard 30 percent of a household's income. Our programs are focusing primarily on the 30 percent to 80 percent area median income households up to 140 percent in any case also.

Rob Gaudin: So 30 to 80 would be for rental and 80 and above would be for homeowner?

Comment 72: Not necessarily. That 140 and why that is in part is because the income data is I think everybody would agree, fairly lagging. So what is being called somebody at moderate income is not truly somebody at moderate income. What we are calling 80 percent or 50 percent moderate income is really more like 40 or 30 percent income household anywhere else,. Because the data that we have to work on is very far behind reality. So we can say that we are building projects primarily for 140 percent median income household, but that 140 percent doesn't mean the same here as it means in Des Moines. That 140 percent income household is struggling a lot more than they would anywhere else.

Rob Gaudin: The median isn't the old data.

Comment 73: Correct.

Rob Gaudin: And it is two years ago?

Comment 74: At least.

Comment 75: It is a five-year average, but …

Rob Gaudin: ACS from 2007 to 2011?

Comment 76: Yes. I think just to add to that too is a lot of these things that communities are seeing is they need essential service workers. They need to staff the hospitals; the fire, the police and so there have been pressure on wages. The wages have increased so they have pushed them beyond that 80 percent. So that 140 percent allows you to capture some of those essential service workers that can't find an affordable place to live. They can't live. The teachers can't live in the communities they are teaching in or the hospitals they are working in. So also by going up to that level you are able to bring in some of the essential service workers and housing so the communities have also benefited from that.

(Presentation)

Comment 77: I think that the mixed income housing being of low priority. That is a natural occurring event when you look at how some of the programs are created in order to subsidize each other. We have mixed income housing that is developed. So maybe there is not understanding why that would be a priority when you are looking at the survey as far as that number is concerned. The retrofitting existing housing to meet senior needs is kind of interesting because you have a really high number and senior friendly housing, but a really low number in retrofitting where they already live. So that doesn't really jive together for me. To me that is the same thing senior friendly and retrofitting existing housing that is making it senior friendly.

Comment 78: When you look at the homeowner housing rehabilitation, I know in our area we are struggling with is the income levels. So you have to deal with the federal and state agencies in terms of access to your money. A lot of them will go by median household income and as far as USDA goes and it is there guidelines are so low and with people moving in. So all of a sudden these communities are having loans and grants for rehab and that affects their access for the programs to go out and do some rehab. I know at least in our area it is affecting us big time.

Comment 79: It seems like we have been getting a lot more calls for those who are having trouble maintaining their home. They can't afford the cost of roofing their home now. So we are getting an increased number of calls for maintenance.

Comment 80: As a side note, I don't know if I would write off the housing demolition category. Maybe a bigger picture of it. If you want to deal with the infrastructure problems at the same time, there are significant pockets in communities where not necessarily housing, but the property is there and in such disrepair and the land is being sold, but it is such a premium that instead of the new subdivision and you have to bring everything out of town. Looking more inward and recapturing those properties in some way and taking care of the infrastructure naturally because it is

already there. So it is not housing demolition but property recapture. I think that a property recapture category could be a strategy.

Rob Gaudin: So if we demolish and recap and redevelop whether it is commercial property to be demolished and put home in, what kind of inventory can we draw on that?

Comment 81: Whatever the need would be, because looking at it just from the perspective from cost of land and cost of infrastructure. The cost to build isn't going to be any different there than in the subdivision two miles out of town. Those initial upfront costs that basically stop projects right from the start because you are paying ridiculous amounts for the land and try to get over that infrastructure hurdle. You build whatever the need is. It is senior housing that is walkable to the church and to the super market and everything else, perfect. If not it is main street employee housing. Whatever you need it to be.

Rob Gaudin: I am just trying to get a gage for the non-entitled areas of the state, 100 units, and 10,000 units? Some measure. Is this something that we should consider as an option? I think it is a brilliant idea, really. Make use of what you have. It is the most effective.

Comment 82: One of the challenges and we have had discussion in our region about taking care of growth. Some of inordinacies do not allow a house to be built on it. We taking a look and saying it would be foolish if someone would want to rebuild on it, why do they have to build so much bigger. We have had that concept here that bigger is always better to build. So you have and many take a look in an area and they can't build on these lots anyways. There are parts that we have is zoned commercial and those are the ones next to the churches. We have zoned some of these areas and have put policies in place that don't allow for a small affordable house to be built there. The other part is we end up with some of our communities in development. They take their lots in the development area. They take four lots and the build just X number of houses and not one per. So you end up with these large areas of development with probably an inadequate number of homes to sustain the structure to pay for the water and sewer and uses and things like this. We have some policies in place whether they are allowed to be built on these properties that doesn't allow for affordable housing to be built there.

Rob Gaudin: So an existing home on a small lot, if you tear that down you cannot rebuild?

Comment 83: If it gets burned in a fire they cannot rebuild. They are not insurable for things like this. If it is a commercial on a commercial lot in a small town and you have a lot of house there. If something would destroy that home they can't rebuild a house on it because of what it is zoned. So we have a couple of them that we are working on right now. If you take a look at this housing crunch and you say we have all of the infrastructure here and how do we build and there is new development outside of town and how do we maintain what we have here, but you take a look at a lot of this property and much of what is rental is owned by someone that is out of state, but if anything happens to it how do you get rehab. How do you keep and do this. To me to discuss some of these limitations. Can we build a smaller house? Does everyone need to have a 5,000 square foot house? Can you build a smaller house and someone can afford it.

Comment 84: You can build a house for 800 square feet was in demand whether you are low-income or moderate income is there a demand for it. Some people say that that is OK, because they don't want to buy an 800 square foot house.

Comment 85: I am taking a look at some in Jamestown right now and the lot that they are on they couldn't rebuild and it is a 800 or 900 square foot house, because it is a very old small house and the policy is in place and they can't rebuild. Some of those discussions we have had are that what we want people living in or not living in.

Comment 86: We have houses like that too.

(Presentation)

Comment 87: Local communities are not going to want to.

Comment 88: They all have their own policies and stuff like that and different situations. The state advocates and says that it would be great if you could do this, but the cities are going to do what they want to do. They have their own zoning ordinances and their own covenants. It would be nice, but I think that it would be a wasted effort.

Comment 89: Every time that we go into a community to talk housing. That is one of the first things that we suggest is what kind of barriers that you have and take a look at your policies and does that hinder anybody to develop affordable housing. We talk about that all of the time, but whether that is addressed is another thing.

Comment 90: I think number 5, they don't want anything affordable. They don't want anybody at that income level living in their community.

Comment 91: So that is part of everything is the policies that you have. We aren't real poverty friendly. That is why we have a low poverty rate.

(Laughter)

Rob Gaudin: That kind of says it right there. If we can't encourage our communities to modify their perspective about affordable housing we are beating our heads against the wall. Maybe you can share some more of your experiences about these communities. Do you have some anecdotes to share?

Comment 92: The lack of available land. We at the Regional Council of Litigation Planning we were doing an annex to a plan, because a community was left out of their mitigation plan. So we held a public meeting for a mitigation plan and we had the farmers come to the meeting because they didn't want any of their land annexed to the city. So that lack of available land is that they don't want to have development going on, except you know for the right price.

Comment 93: All cities face that. Nobody wants their annexed. Annexations are huge debates in most of the cities around here. I know she has had a number of them where they have gone out to court to stop annexation of their land because they don't want to get into the city and taxes and they could care less about the city services. If there is a fire then they want that city fire truck out there, but they don't want to pay for it.

Comment 94: That is a little different than what I am thinking about the farm land which is rural verses Jamestown that unless you request to be a part of the city you are not. So we have these little

plots all over the city. Land that should definitely be in the city and taxed as city land, but it is not. They are receiving all of the city services, but they are not getting water and they are getting sewers we have septic systems in the middle of the city. Just very odd strange things that shouldn't be going on, but again it goes back to local leadership. The state is not going to tell them what to do.

Comment 95: Even if we did they would do the opposite.

Comment 96: They don't like the state or the federal government telling them what to do.

Comment 97: In the last year and a half in McKenzie County who is the largest oil producing county in the state finally passed a zoning and planning ordinance and they were the last county in the state to do that. Basically they always said we don't need that, you guys will tell us what to do. Now because of oil development they had to go in and do something and they finally went and did it.

Comment 98: I look at Jamestown where we have a prison and we have the mental health, we have a lot of people that come out of there and live in our community. That not in my back yard causes a large issue of cost in our community, because we don't allow and we don't want to have any halfway houses or that type of thing. So we look at and we have scatter throughout because a law enforcement issues and providers on how do you go and serve that type of thing. Coming up to not even wanting to support any of this is so intrinsic to what they do is that they don't even realize that when they put barriers to affordable housing and to do some of these things it has many different layers to why there are those barriers. When you start talking about something there you have to ask many questions as to why they are opposed to something. The elephant in the room is someone new living there it too many conversations to find out why they might be saying no on some of these things. I don't know if Bismarck has some of the same issues or not.

Comment 99: Yes, Bismarck had a huge issue. That day that they were going to put a soup kitchen in there and a few other things, the neighborhood basically revolted and said no. So they had to change where they are providing those services and they want to have transitional housing, but it is apartments and stuff now. It is the same thing. Everybody see it the same way that that is a great idea, but just doesn't put it up in mine.

(Presentation)

Homelessness Focus Group

Comment 1: They live in their cars. They live in storage units. They sleep in other places not meant for human habitation. There are a lot of people who are couch surfing. So we used to be able to count our unsheltered in North Dakota on our fingers and toes and now we have had numbers that have ranged in recent years from a low of 400 to a high of almost 1,400 who are unsheltered. There are primarily people who have come into the state looking for work. Our Point-in-Time count asks the question have you come here in the last six months or 24 months looking for work and if you go back 24 months 80 percent of our unsheltered are people who have come in looking for work. Then we ask if they returned to their home state or their state of origin would they have housing. We find that I am pulling this number from my memory, but it is two thirds of them say they would not. If they say that they would have housing then we ask them would you have employment and again about two thirds say that they would not. So we have people here who are homeless, but have a home somewhere else and they are sending resources home to maintain that, but the vast majority of them are people who are just here looking for opportunity and they are sleeping in cars and tens. Anything they can put together. There are farmers that are sort of clandestinely letting people park in their barns for a fee and things like that.

Comment 2: Or stay in a bottle until they run out of money. There are a lot of campers.

Comment 3: There are a lot of tent cities up as high as 400 to 700.

Rob Gaudin: In one location? Now is that families or singles?

Comment 4: Singles. It is mixed.

Comment 5: When you have people on housing you have to be careful with what they do and if someone joins them. Then they are close to losing their housing then. You have to be real careful. We have seen people lose their housing and now you have two people homeless. Two different units.

Rob Gaudin: This particular point. They came out with the July 1, 2014 estimate of North Dakota's population. We don't have any details on that yet. So I just took the statewide percent change and pasted it up there. It just seems like this is going to put additional pressure. Let's pretend for a moment that oil stays low priced, below $50 a barrel. What is that going to do for your community?

Comment 6: I guess I can give you an opinion.

Rob Gaudin: I am only asking for your opinions.

Comment 7: The drilling part is definitely going to slow down, but the maintenance part is what is really bringing these workers in. The maintenance part and the majority of the well is set up and drilled out even with low oil prices they pay for themselves in month or r two. So there is still a lot of money even if they are at $40 a barrel. Once they are pumping 1,000 or 2,000 barrels a day are still very profitable. They are just not drilling new ones. So you are still going to have that influx of the blue collar labor that is going to come in that the rest of the country cannot supply jobs to. We actually have the jobs for them. The high tech jobs are probably going to go away, because that is

part of the building process, but the blue collar people they definitely going to be coming if the rest of the country doesn't turn around, because that is where the majority of the jobs are. That is not going to stop.

Rob Gaudin: Those jobs pay reasonably well. Why would they be homeless?

Comment 8: There is no housing.

Comment 9: There is no housing available.

Comment 10: When housing is available it is not affordable for the most apart. We have had instances and this is just antidotal, but we have instances where a single mom who works as a cashier at a Walmart and she is not here looking for oil work and she is someone who has been here. All of a sudden get notice that you have been a great tenant, but now that your lease is expiring we are raising your rent from $450 to $1,450. Those stories are common. So the state initially really moved forward very quickly with the development of energy resources and sort of dragged its heals on the development of infrastructure and housing and that has created this extreme housing shortage where we have the most vulnerable people in the state who are competing with the workforce for the little bit of housing that is available.

Comment 11: Along with that because of the housing that is available the landlords and management companies that are allocating these apartments they have been able to put stronger restrictions on the ability for people that have anything on their backgrounds to move in. So many of the management companies that we know of saying that you have to have a 600 or better credit score. An individual might be making good money, but their credit score might still have been in effect from when they didn't have income and so it is things like that that are also additional factors.

Comment 12: I have seen a story or two about that housing situation and I don't know if it is true or not that some of the development now is starting to catch up with that shortage in oil patch and not sure. I am just asking the question because I have seen at least one story and maybe there were two that talked about some matching up going on. I thought it might and I am not sure about Williston.

Comment 13: It basically has, but the cost of getting in that housing. You are going to look at a single bed home running about $2,000 a month. Then you have the deposit and they are taking two months of deposit. So if you are looking at two months of $2,000 a month you are looking at $4,000 to be able to move into that apartment. If you look at the new construction coming in a lot of it is coming down to the lender. If you don't have a ten year turn around on that investment they are not going to bother to give that money to you. So if you are not operating for cash on that. So the ones that are really reaping the benefits are the ones that already have their stuff paid for before this happens. The new stuff right now is still out of touch with normal people. We look at it in our area. If you are not at a $15 or $16 dollar job here you are at minimum wage. If you want to move into that type of a housing situation there.

Comment 14: The reason I brought it up too is you might remember about two years ago we had that fellow from Fargo and he was predicting that some of the developers who were trying to squeeze might get into trouble because the development was going to catch up. I was just wondering if the story…

Comment 15: Over building on the high end is what you are getting at too, right?

Rob Gaudin: This is permitting records from 2013. Not all were available, but it will help a little bit. This is single family here. Historically this is like way beyond anything seen previously since 1980. 1980 was a boom.

Comment 16: I think you have to throw in you are looking at 2010, 2012 where we had that huge flood. So a lot of homes were lost, like 5,000 homes or whatever it was. So there was a huge build up in 12, 13, but now it is in 14 it is way down. Building permits are way down. I think it is not only trying to increase apartments and housing for people that are coming in, but we lost all those homes and we had to try to recoup those homes. Then again the river went right through our town and cut it in half, but all of our poor elderly people where in that area where the river went through and flooded. So it was the lower end of the income level that was really really hurt.

Comment 15: I think to add to what she is saying. The replacement housing has not been built that matches that income level. Most of the replacement housing is higher end housing and if you go to what he said the development approach has not been very balanced. It has been really focused on that higher end and that workforce without having really any accommodation or a plan for, the phrase I used before, the most vulnerable. The people who are in poverty. The people who have disabilities and the people who are on fixed incomes and all of those folks. We really need a balanced approach that requires the development of the lower income and supportive housing for people who really can't compete for the housing that is available.

Comment 16: I think at the beginning of the oil boom a lot of the landlords got out of low income housing because they didn't want to deal with HUD people and they didn't want to mess with anything. So all of those apartment buildings and all of those open apartments went to fair market rent apartments, which then pushed out the elderly and pushed out those people that are minimum wage jobs. That happened at least in our area pretty much right off the bat. All of a sudden there was no low-income housing or very little.

Comment 17: A lot of those individuals that were on housing actually lost their vouchers and many of those were transferred to another area of the state.

Comment 18: What we understand we may lose out HUD vouchers. It looks like we don't need out HUD vouchers, which means that we don't get our HUD vouchers then next go around. It is not what is happen at all, but that is what it looks like.

Comment 19: There isn't any housing that they can use them, because all of the housing is too expensive.

Comment 20: In Burleigh County their housing choice voucher program is closed. There are 1,200 on the waiting list. It has been closed for six months. According to him yesterday and he has 800 vouchers and he can't get 1,100, but he can't get the money to supplement the difference.

Comment 21: He had two issues. One is that they were looking bad and the second one was the $1,000 doesn't go as far as the $1,000 was intended to go as far as the number of units you can provide for. So he is losing on both ends. I don't think that it is too much of a stretch that was and

that is the case in all of the housing facilities. I know for sure in Fargo that it is definitely also an issue.

Comment 22: It is. It is happening now.

Comment 23: So we end up having individuals staying in homelessness longer and one of the things that I see is the difference is with ESG and all of those things. They are asking for the number of individuals we have served and not all the times that we have served all of those individuals. So you may only have 50 people in your shelter, because you only have 50 beds, but you may have them every day for the entire year. If you can say I had 25,000 touches with all of those individuals and we worked with all of these different resources and we worked and worked and worked. We are starting to see that is where we are starting to lose our battle. The number of nights of shelter is increasing, but the number of individuals isn't increasing because they are not staying with us for those 90 days. They are staying with us for nine months, 12 months, 14 months.

Rob Gaudin: You said it had going up from 400 to 1,400.

Comment 24: That is qualified in a couple of different studies. There was a market study by Beyond Shelter and they found an efficiency that was $600 in February of 2011 was $1,650 just seven months later. We have seen the vacancy rates hovering between 0 and 0.5 percent in about half of the state with vacancy rates still as low as 1 to 2.5 to 3 percent in parts of the state. We do have this tremendous increase in rents and the FMR the way they are calculated at least in the rural area with the dynamic economic like North Dakota doesn't work. They are using statically trend data from the ACS and they go back to a certain point and they go forward and that creates a trend line. Well if our influx of people is going like this and that trend line cuts off…

Rob Gaudin: It is a five year rolling average.

Comment 25: Exactly. So we have a greatly under calculated FMR in the state. So when you get and even with the exceptions they have given us. I think we have some counties that are up to 125 percent now, but even with those exceptions finding an apartment that qualifies for a voucher is next to impossible. The story that we hear continually is someone's name finally came up on the list and they got their voucher. They spent a month looking for their housing and didn't find any. They got an extension and spent another month and didn't find any. Now they are back at the bottom of the list or even out.

(Presentation)

Comment 26: So we have always in the past tried to interview every homeless person in the state. We got to the point where we had so many people unsheltered, more people were unsheltered than sheltered then we began our HMIS coverage and data quality got high enough that we were able to draw all of our un sheltered data form out HMIS system. The freeing up all of our volunteers to go out and try to locate and interview all of these people who are unsheltered. The challenge with that is we are a very large rural state and the growth in homelessness where we had the greatest growth has really been in small population areas like Williston and other communities up there and so what has happened is we have a lot of people that are hard to find. In 2011, we did do a study that is not and it was a summer Point-in-Time count and we had 900 people outside. We were not able to get the volunteers for the 2012 count to replicate that, but we did in 2013

reorganize out counting method and so on and we were able to count that number. What perplexes me is how we got from 1,395 to 464 and I was looking earlier at our 2014…

Rob Gaudin: This figure, there were 22 households in Region 1 and 624 in Region 1 households that were homeless. I am wondering if it is that one region that counts for this.

Comment 27: Yes, that one region counts for 80 percent or so of that increase. That is a region where in the past we had probably zero unsheltered.

Rob Gaudin: It was just zero counted.

Comment 28: Zero counted but probably zero as an actual number, because there was a very limited homeless number of people homeless in the Williston area. It is just not a place historically where homelessness has occurred.

Rob Gaudin: OK, but the oil boom stated a few years before. It is almost like there is a change in methodology here?

Comment 29: Yes.

Rob Gaudin: And the methodology was abandoned here.

Comment 30: No.

Comment 31: I think what happened was if I recall right in 2013, weren't a huge number of those people that were recorded there; they were all in one primary area. Then in 2014 were they not asked to leave?

Comment 32: They were dispersed.

Comment 33: So they weren't able to locate them.

Comment 34: The camps.

Rob Gaudin: We are trying to with this, is if this number is actually more accurate, this is grossly, all these others are grossly under representing what the homeless population is. At some point in time you are not counting these. It is too cold to go find them. You found them because they were located in one location. Is this a reasonable statement?

Comment 35: It is fairly reasonable except to say that from 2006 to 2010 we had very few unsheltered in the state. Then that began to escalate in a huge way in part because the major growth in homelessness was in an area where there were no shelters and when someone did need shelter they were using hotel vouchers. The oil companies leased up all of the hotels for a year at a time and so now there are no hotel vouchers anymore. There are no shelters and there never were. That is where the people are coming, so we had this explosion and literally an explosion. Another thing we have asked people is what your state of origin is. We have documented people from all 50 states in North Dakota including Alaska and Hawaii.

Rob Gaudin: Where I am going, another place I am going is to try and see if this persists. You suggested that the economy is not going to go down. The price of oil went down, but still production is going to stay where it is at and those people are going to come looking for those jobs. Is this homeless problem undercounted and getting worse?

Comment 36: Yes.

Rob Gaudin: So how much are we undercounting?

Comment 37: We are seeing right now is the chronically unemployable that are coming into our state now. Those individuals who haven't worked. I have a gal in my shelter that hasn't worked in 13 years and is now in our community. In the last nine months has been trying to find a job and they have never worked and they have an awful lot of additional needs. They are not ones that are going to be able to walk into any business and get a job tomorrow and keep that job for long periods of time. Even if our numbers of unsheltered keep going up and down, we are continuously working as agencies across the state to and transitional housing and shelters and push for affordable housing and work together to try to change that. So what you are seeing is we are increasing shelter beds and transitional and permanent housing and permanent supportive housing to try to decrease the number of unsheltered, but we are losing the struggle because they are spreading out so far and we can't find them.

Comment 38: I run a homeless and domestic violence shelter. We do both and we get at least ten calls a week from people from other states. I think now the word has gotten out that there may not be housing, but call the shelters, because you can stay at the shelters. So I think that is another issue that has to be locked at is every shelter in North Dakota I think is full. Every one of them and that never used to be. When I first started 13 years ago and if we had one or two people in the shelter that was pretty good. We can give 18 in our shelter and we are at capacity all the time and we have gone as high as 26 people in the shelter. That gets unmanageable.

Comment 39: In 2013 was the peak of that region at that time. The peak of people, since there have been a lot of zoning ordinances that have come out and aid that this is not allowed. So disbursement more out. You are looking at a region that is also associated with Montana. There is an oil field over there so you have a lot of populations that and especially the Hispanic and the ethnic ones and have moved into Montana and into Sidney and the other outlying and closer to boarders and they are crossing across. So a lot of these numbers and it is spread out. A lot of them came down to the Dickenson area, because of Williston was the epicenter. It is not necessarily all oil people there it is just that that is what was.

Comment 40: Well the other thing despite the fact that we all agree we haven't had added enough affordable program housing there has been a significant addition of affordable permanent housing in the last three years also. Even though those numbers certainly over all of those even in shelters certainly seem to be rising. If you look at 12, 13, and 14 your shelter count has gone up by 100 every single year. Despite that we have added permanent housing and we are still just not keeping up with it. I think it is important whether it be sheltered or unsheltered that we have added permanent beds. We have added permanent emergency shelter beds. You can see it by the numbers, but it is not really meeting demand.

Comment 41: Another thing to keep in mind too in the epicenter of all of this oil is Indian Reservation and these numbers do not count the numbers of homeless on the Reservation. I think if you had those numbers you would probably see an additional 2,500 people that are unsheltered.

Comment 42: I think one of the things that we will see especially if people start losing their jobs or their overtime; a lot of jobs are connected to housing, because that is how employers were getting people. So if you lose your job, you also lose your housing or if you lose your overtime then you can't afford to stay in your home anymore. So I think we are going to continue to see people coming and seeing more people losing their housing.

Comment 43: It is not just one person coming for a job. It is like they come with their whole band of brothers. It is like a band of ten and one gets the job and the other nine now are wavering between every agency, because they just hopped along for the ride.

Comment 44: We are also seeing a lot of women who are accompanying men who are coming and seeking employment in the oil patch and a lot of these women are seeing this as this is my chance to improve my life. I have got a guy who looks like he is going to be a hard working guy who will go out there and do what he needs to do. Then they are finding themselves in toxic abusive relationships. So we have our DV shelters full of women from out of state and many of them would like nothing better than to just get back home again.

Comment 45: It is just not out of state, it is out of the country. We have seen more immigrant issues than we have ever before, because they are bringing these women over from other countries.

Comment 46: Not only does oil run rapid so does drugs and so do alcohol and it becomes very cyclic. It is guns. It is the wild west.

Comment 47: Sex trafficking.

Comment 48: We cannot not mention sex trafficking and human trafficking in general.

Comment 49: North Dakota has always been a state where we just have this vision and we don't look around and we don't ask questions and we don't. It is becoming harder and harder for agencies like ours to educate the community and educate the individuals. It is not because they are homeless without anything to do. Some of these people are working two or three jobs trying to make ends meet, but they just don't have a home to go home to. So they come back to our facilities.

Rob Gaudin: So if we look at the system emergency shelter and transition, where is the bottle neck?

Comment 50: Permanent housing.

Rob Gaudin: That is the bottleneck.

Comment 51: The system is constipated for lack of a better word. There is no place for a person to exit from any type of supportive program, whether it be transitional or permeant supportive. There is no exit into just straight forward permanent housing.

Comment 52: But in fairness that backs up the transitional like she was saying your emergency shelters are keeping people longer than you used too and your transitional are keeping people longer than you used too. So it causes this trickledown effect that does have an effect. The bottle neck, if you will, as you used is really about getting them into the affordable permeant housing.

Comment 53: Then you end up with increased revisits.

Comment 54: Revisits. You get them into affordable housing and something happens and their rent goes up and they are on a fixed income then they fall right back into the emergency shelters and are homelessness all over again. Then we walk them back through the steps again. That is not something that HUD wants us to do and that is not something that we try to do, but because of the nature of everything that happens.

Rob Gaudin: Isn't HUD trying to pinch this right here.

Comment 55: They probably can if they want to. That would be their strategic plan, but when you look into the major cities that is not there. They are looking at down the road we have been through these oil booms before and everybody has, but every strategic plan that is looking at major cities is looking at their tax base so they can have so meeting taxable sustained on their building. Transitional housing and affordable housing doesn't do that. There is NONE in the cities that you look at in the western part that really has an affordable housing plan, because they don't want it. It drops the income and the taxable base in that town so they are not even going to go their unless they are forced to or some other way. That is where it either has to be in the smaller communities in the county or basically it is just not going to happen right now, because they are looking farther ahead and when this thing crashes how we are going to pay for this.

Comment 56: Just to add a little bit to what she said. The numbers that drive all of our funding were are not necessarily have higher numbers because we are keeping people so much longer, but that makes it so much harder, because when we do our reports unless you actually live here and see what is going on I don't think that you would begin to understand. You can put it in a narrative and try to say it as best you can, but I don't think that the people that have the power really know and understand exactly what is going on here.

Comment 57: We are also and I am for-shadowing and I think we are seeing already some latent consequences to us utilizing best practices by making sure that we serve the most and because we are making that choice which is a good choice to make we are causing some latent consequences on the other end which is those that ae the most vulnerable require the most time and every and effort to maintain in some level of emergency transitional housing or get to permanent housing. You are creating another; if you will, bottle neck with that where with those that are not as vulnerable are either going without the supports. When we would theoretically according to the model, they would, could, should get them into housing and it doesn't have to be affordable, because they have the ability and resources, but because of our financial challenges and the lack of availability of housing. They are not doing it. So in many other parts of the country right now they would just self-correct, if you will, and find some housing for themselves and that is not happening. So we are devoting a lot more time, energy, and resource into those most vulnerable and those that could, should, would either self-correct or with a little nudges correct and get into housing it is not happening because of the lack of availability.

Comment 58: To underline what he said the stress on our facilities and staff is not by the numbers that are reported here, but by our shelter nights. That is where you really see what is cracking and causing the stress of us anyhow. So we always go by shelter nights when we show and telling people what we do and how much we serve.

Comment 59: I just told a funder yesterday that I think shelter programs in the state are not getting the funding that we need because of what we have been talking about today is the numbers are so high, but it is the same people. All of our formulas and things that we go by is they want how many people you serve.

Comment 60: Different people.

Comment 61: How many touches. I think that is a very big frustration for shelter programs, because we are expected to do more with less and it is not going to work, because our staff is under paid. They burn out. They are ready to leave. We are seeing more addiction issues. We are seeing more adult health issues. So the type of individual we are seeing is so much harder to work with staff that is making less than they could at Walmart or at McDonalds. So that is hard.

Comment 62: Just to add to that is we are seeing gangs. We are seeing white supremacists. We are helping clients and it used to be and I just this to one of our law enforcement, you now that it used to be just jerks and now it is very very scary people that we are having to work with. Which then your staff is in danger and you are in danger and at some point people just leave because they go to an oil company and get $25 a hour doing invoices. So all of the places that are talking care of these people that are homeless and are working with much more dangerous people.

Comment 63: At our shelter we are considering hiring people to just do pat downs now because weapons and drugs have become such a problem. We are having issues that to get into a housing assistance apartment you might have a six month wait and that is just in Grand Forks. We like to devote more resources to the people trying to get out, but what was said early about the chronically unemployable we are devoting so many resources to these people that we are splitting up, what we should be doing is helping people get out. We have a couple of people that have been in our shelter for over 20 years and right now we are at 110 residents. We are looking to expand to more beds and going back to what you said about our staff. We are losing staff left and right. We can't keep them. We are literally paying half of what other places can pay and we don't have insurance. So it is such an uphill battle. All of the funding, you know they say lets build more transitional, not transitional, more fixed housing, more permanent housing, nut how about the staff. You can't help these people turn their life around unless you have a staff that are able to do it and you can't have a staff that are able to do it when they can go work for the City of Grand Forks and make more money.

Comment 64: Over the last few years even the funding that we are receiving from the COC is going more towards the brick and mortar and away from the supportive service piece and that is the biggest thing is it is easy to, it is easier to look and get funding for a brick and mortar and build and build and build, but the only people that are going to help these clients are the staff that are willing to hold their hand and take them from step to step to step. We have staff who run an open warrants check, like we do at our facilities and DCI is coming in and you have got, you are getting calls from immigration. You are getting calls from all of these places and law enforcement is coming in just to meet with these individuals because they are a part of all of these watch list and these groups. You

have staff that just say I don't want to deal with it. None of our facilities are safe enough for our staff let alone for our clients. So it is really hard to ask for your hard earned money to help a client when you are trying to keep your staff safe by investing in metal detectors and bullet proof glass.

Rob Gaudin: So are these categories not representing who you are seeing. Are they persons not otherwise categorized?

Comment 65: I want a class that says not severely mentally ill. I want those individuals that have a mental illness that just are wavering through life for the last 40 years and have gone undiagnosed and they are considered the ones that the parents just drop off at the homeless shelter, because they are just hard to deal with. Those are the groups that we are seeing more and more of. It is not the severely mentally ill. Our human service centers try really hard to assist those individuals. It is those individuals that just have fallen through those cracks.

Rob Gaudin: What about this category here? Persons not elsewhere otherwise classified, which is half of this population in 2014. What is this actually categorizing?

Comment 66: We have a lot of people that have a crime history that no landlord would ever rent to them. I don't know if that is on there or not. A lot of people are on probation and they say you know what, I could either be here or center, their half-way house. So I would rather be here. They choose to live in our shelter and they have a fulltime job. They may not be able to find a rental unit that easily, but if they could it would just cost them more. So they want to save money so they choose to live in the shelter. It is hard to kick people out and then they go to the paper and you get that bad press. Then your community funding is threatened. So that to me would be otherwise classified.

Comment 67: To me and I notice that there is a much lower number of reported unsheltered, because of how difficult that is to gather that information. Once a client comes into your shelter based system you are more readily able to say that they really are SMI. You could just take a look at that. That to me is the clearest and yes there is only 16 unsheltered out of the 464 that were SMI, because you can't really say for sure. I am out there trying to get these numbers too, but it probably is, but do I have enough to really check a box and say he has an SMI issue.

Comment 68: I think that the other issue that we are going to be seeing very soon is as far as numbers go is I don't think that Victims of Domestic Violence are coming to our agency as much as they used to, because they know the shelter is full and they know, they absolutely know that they cannot do another. I think there are a lot of situations going on because they know that if they try to leave that they will have no place to live. They will have no place for their kids. All of those issues and I think that is going to affect that number until the housing comes down. It used to be that we could have a women come into our shelter and within two weeks to three months we could have them in an apartment with a job and hooked up with counseling, everything. Now probably it would take three years.

Rob Gaudin: That is very much a challenge.

(Presentation)

Comment 69: I think that the number of households with only children is considerably higher than what is reported here. Youth and unaccompanied youth in particular are very difficult to count because they don't want to be associated with the homeless population. They don't see themselves as homeless. They are quite frequently resist to authority and therefore don't want to be approached from someone from an agency. So we have always had a challenge counting unaccompanied youth and when you talk with providers, you are hearing them talk about a lot more youth that are coming up a presenting on their own.

Comment 70: One of the things that are happening in North Dakota does not have an emancipation law. So when North Dakota has a legal system that says if you are an unoccupied youth you will go to foster care. So the reason that is under reported is twofold. Number one if I know of it I am obligated by law to report them and the kid needs to be put in foster care. So I am not going to report that. You are in a catch 22. So there is a lot and plenty of times where our workers are saying that I am not even going to ask that. There are times when you selectively not asking certain questions. You don't want to put that kind of pressure on the system or on that particular individual. There are youth that are out there and they can't formally seek services, because if they do formally seek services then they will be put into that system where they are by no means interested in being out into. I have been at this 18 years and I have two people that came to me and said that I don't care I will go to a group home so that I can have a place to live. It just doesn't happen.

Comment 71: I can speak for our agency we can't even provide services for anyone under the age of 18. So that could be another reason that that is so low is because those of us that can't serve are always going to have zero. We may have had somebody come…

Comment 72: It is also for that same reason that your mandate would be that I have to call child protective services and there needs to be an intervention.

Comment 73: So we don't even report that.

Comment 74: All the kids are just magically 18 when they come.

Comment 75: You get a lot of couch surfers. There are a lot of kids who are just bouncing and waiting for that magical date.

Comment 76: I was just curious and if you wouldn't mind backing up on that initial screen from when our Point-in-Time was. I had just a question, because we decreased almost by half from 2010 for our transitional housing to where we are at in 2014.

Comment 77: Part of that could be because we lost our transitional housing in the flood. So we went form 8 units to zero units.

Comment 78: That is part of it and the other part is the previous COC coordinator had many beds on there that did not qualify.

Comment 79: As transitional?

Comment 80: They were transitional, but they were not solely designated for more people who were homeless. They may have contained people who are homeless, but they didn't fit HUDs requirements. So we had to make an adjustment in our housing inventory chart at that time which then affected the Point-in-Time count for the number of people in transitional.

Comment 81: So in reality we really didn't move a whole lot of transitional housing beds. It is just that they were not counted correctly.

Comment 82: Correct.

Comment 83: OK. So in other words the 2009, 2010 numbers should be lower. Those previous numbers should be lower.

Rob Gaudin: These should be lower.

Comment 84: Yes.

Rob Gaudin: You are explaining what made this.

(Presentation)

Comment 85: I think we should make a note and I think that someone else mentioned before the lack of reservation information. The reason Region 3 is so high is because we did get that Reservation to participate in that count and that really puts it into perspective that you have one Reservation in one of those regions participated in that count and…

Rob Gaudin: Would you do me a favor. The last slide has Adele's email. Would you write here and say which regions this is subject to.

Comment 86: It will be a combination because some of them fall in a couple of regions.

Rob Gaudin: I just find this one.

Comment 87: Really for Point-in-Time that is exactly what it is. It is a Point-in-Time so you don't catch, you don't locate them. So that is exactly what it is. It is a Point-in-Time.

Comment 88: Yes, if you were to do whole weeks' worth your numbers are going to go like this. I will tell you just even in our shelter we fluctuate. We can fluctuate 30 people in one night depending on the day of the week, what is going on in the community and all of those things.

Comment 89: Is that sheltered and unsheltered? It doesn't specify. Region 8…

Comment 90: I think Region 6 is probably a little lower than it should be. I know that it is changing and there is a lot of industry coming in with the shortage of affordable housing too.

Comment 91: I think Region 2 is low also.

Comment 92: I think they are all low.

Comment 93: When you compare to some of the counts that we have had mine had over 1,400 children in public school that were considered homeless. Bismarck has over 450 and Mandate has over 150 children. So even if you were to say three per household you are looking at three times your number,

Rob Gaudin: These are your numbers.

Comment 94: That is what I mean…

Rob Gaudin: The point here is that every time you count for homelessness it is going to be a different count and how broad of a difference is there. I just don't mean Point-in-Time, but if you called the school system and had them report to you the same day that you do your Point-in-Time there is going to be wildly different counts of who is homeless and the age of the homeless. So it is a really difficult population to count.

Comment 95: Also couch surfing, all of our crazy tent cities, and all of our craziness in the western part of the state, those are not considered unsheltered. If we were able to count the number of people who are living four families into one apartment and those other three families were considered homeless. We could go into all of our man camps in the western part of the state and consider those individual unsheltered then your numbers would be immensely different, but they are not in an emergency shelter. They are not in transitional housing. They are just another.

Comment 96: They just want to be and trying to try to get somebody to admit and I am sure you have all read that there are housing deficit is really hard in the west. That they might get booted out of where they are at. So if you are living in a single apartment with 12 people, you don't say anything because…

Comment 97: That is similar to the youth point that I was making, which is the consequences are too big to acknowledge that there are four families living in one household.

Comment 98: I can say one thing; I think our organized effort to really get the full count has probably been a little bit lacked. To be able to get a full reached wide. We can come to Dickenson, but…

Rob Gaudin: A full count in winter is really a challenge.

Comment 99: In 2013 and 2014 the temperature without the wind-chill in both of those dates in the Point-in-Time was more than 20 below zero. So that makes it very challenging for the volunteers and for those who are out there struggling, they are holed up tight somewhere. You may get them if they come into an agency for a meal or something like that. They maybe really hard to find. We do have someone in one of our veterans programs who has really developed expertise in finding people in some very remote locations and she is literally found people in grain bins, haystacks, and culverts. So how do you make sure you follow up with those people? I am not saying that we have got a ton of people living in culverts, but there are people staying in some very strange circumstances and it is fairly primitive areas where we are not finding them.

Comment 100: You go to other parts of the country and on January 21st it is 40 degrees outside and these individuals are still walking the streets and are visible. At 10 degrees people are holed up

where they can get. So it is really hard when you can't just walk down the street. You are finding people underneath the carts at Walmart. It is just crazy.

Comment 101: We have people in Dickenson who will fake some sort of an illness to get into the hospital or do something to get them in jail overnight just so that they have someplace to be.

Rob Gaudin: To get out of the cold.

(Presentation)

Comment 102: I think emergency shelters in the western part of the state are nonexistent. I could see if the people takin that were from the western part of the state they would lost that as a high need.

Comment 103: In Minot we have a domestic violence shelter and we have wives, a shelter for women and they just opened a men's refugee that just houses meant night, but we still don't have anything for families. Nothing that is consistent, listed as the same way.

Comment 104: I am probably going to rile some people here, but I have a little bit different opinion about this and part of it is it is just I understand that we don't really have much for shelters in the western part of the state, but what I have continuously been hearing and even from here is that the shelters themselves here are not really operating as what we would define as shelter. They are operating more so as a transitional housing. So I guess my challenge is, is there a need, higher need for housing than there is for shelter?

Comment 105: I will echo what she says completely. That has really been one of the biggest challenges of my job is to get the public folk off of shelter is a solution to homelessness, because after all if you are in a homeless shelter you are still homeless and housing is the really only solution to all of this. A home ends your homelessness. We need housing opportunities for all of our people regardless of what their circumstance is and so we need to develop those appropriate housing opportunities. Unfortunately there are sometimes and some people might be upset with me for saying this, but sometimes shelters prolong homelessness, because of policies and procedures that they have or because of whatever kinds of issues. I don't want to point any fingers at any shelters and I am not going to do that. The real solution is the permeant housing and I think that the permeant supportive housing and transitional housing, both of those should be higher on the list. The housing designed for persons with disabilities and all of those should be higher on the list and then that need for shelter will come down, because we are able to transition people out of shelter and into a permanent situation and making room for others that are unsheltered. It is the bottle neck that we need to correct.

Comment 106: I think that it is indicative of the needs and everybody needs to have their basic needs meet and food, clothing, shelter is what those struggles are and often times you go to that lowest common denominator of yes the better solution is to have more permanent housing available. I think when people simplify down to what is the greatest need and I am just throwing this out in what I assume. I think most people are going to say that we can't have them on the street. All the time I will have people calling me and it is really about we can't have someone on the street. They are not maybe willing to think about that longer term solution. This needs to be the priority is we can't have someone freezing in North Dakota on the street. That is what makes that

conversation a little more difficult, because I don't disagree with them. But I can see why then would raise itself to that level that what do you seas the greatest need.

Comment 107: But you also see when things happen it is always about emergency shelter. You could drive down the street and there could be transitional housing and group homes for people that are disabled and you don't see those things. When something bad happens it is always homeless man broke into the pharmacy and homeless women did this and homeless this and homeless this and then they say they need to have a shelter. These people need to be in a shelter when technically it costs more for us to keep someone in a shelter for 365 days then to put them in a $1,000 a month apartment.

Comment 108: That is right.

Comment 109: You can't educate the community enough to say I don't want them in shelter. I don't want my shelter numbers to double and triple every year. I want them to go down, because I want them to be in a place to be and come back to us every three months and get a food basket and assist them. We don't want them to sit in the shelter, because that is not a place for individuals. Especially those with any sort of mental illness and medication that doesn't work. The elderly and anyone under the age of 25, they don't belong in the men's overnight emergency shelter. In my opinion they are kids and I don't like to take anyone under 30 in the emergency shelter because it is just not a place for people to be.

(Presentation)

Comment 110: The affordable housing and the ability for us to voucher these individuals who are on a fixed income.

Comment 111: Let's not forget supportive housing in that category as well. Supportive and affordable.

(Presentation)

Comment 112: I mentioned earlier the ability to manage their tax and that is how and I would guarantee in Dickenson that there is anywhere in that area with the zoning it out beyond the point. If you want to go beyond the point to cheaper our zoning boards are going to say no you won't be able to build a subdivision or something else. They have shut it all down because of reasons that it got to be too much work. That would be in Stark County because they have always had that zoning board. Their zoning board said that we are not allowing anything to go out beyond. If it is not in the cities or small towns you are not getting a subdivision. A lot of it come done to anyways you go down to the cities and you are looking at Dickerson, you are looking at $200,000 an acre. You are not going to get anywhere in the immediate city limits.

Comment 113: That is the other issue is available land within the city limits it is near impossible. So it is not even about zoning necessarily. It is the costs are so prohibitive. You have to be someone who is on the higher end in order to do it.

Comment 114: It comes back to the ten year trigger. It is not affordable housing anymore. It just can't be. It doesn't fit in there even with vouchers or anywhere else. It might be in some of our sites

and I won't mention which one, but we are just not getting the city on board with that. They are too busy planning. They are too busy moving their city along to even take a look at. Right now we are on a homeless coalition to try and get some of these things here. The bigger push for them is to give it to the churches. This is your problem. They push away from it. The churches they get some finance from the city, but the homeless coalition can't move things onto a permanent solution or a more organized solution than what the churches are getting. They will put a few dollars to the churches, but if the churches don't want it any more. They can't keep up with it. They can't keep up with volunteerism or any of it. The push is going that way, because they know that people are going to go to the church to donate money. They don't want the problem in the public so they are going to shove it there. As far they are concerned they don't see. You can preach all of these statics you have here, but their minds are closed. They already have a direction and that is how it is going to be. Quite frankly and I hate to say it, but you mentioned it before, but until somebody freezes or get hurt or it has to be something like that, you will get the public support to say that you guys should do something. Our biggest fear is that when that happen there and so far we have been able to avoid that saying it is the Homeless Coalition fault and they didn't do their job. They give us nothing to work with.

Comment 115: To me the barriers are and it is really resources. It is resources and then it is resources and then it is resources in really trying to address. You need the resources to build more affordable housing. You need the resources to pay the workers not burn out and to stick around. There is a shortage of those resources. It sounds ridiculous to say that in the State of North Dakota, but there is a shortage of resources for these issues. It is not seen as a high priority by our state government to put money or our local government to put money or resources into that. We are beating our heads up against the wall to try to educate those latent consequences that it costs more to do nothing than it does to do something now. It is a difficult point to be understood by many politicians.

Comment 116: We just can't continue to have an increase in even federal funding. If we don't receive any additional funding from the Federal Government until five years down the road and we actually receive an increase, we are not going to be here. That is exactly what I am telling all of our senators and our representatives in Washington is if you can't help us and help our agencies that deal with this day to day, we won't be here and then what happens? I close and they close than all of these individuals are out on the street and now it is an epidemic, because when they are under our umbrellas and they are not out in the public and people don't see it is all OK. We scrimp and scrape every month to make sure that we can get to the next month and knock on wood we have all been able to keep things going, but that is the problem. We can't scrimp and scrap any more.

Comment 117: It is worth saying that this is not a direct knock on our friends in the back row. Every single funding source that I think all of the non-profits in this room are participating are expecting more from reporting and proof that you are doing which is not a bad thing, but with the expectations continue to rise and rise. So you are spending more of your time justifying what you are doing and it is starting to take more time to justify what you are doing verses actually doing the job. So that is a challenge too. That is federal, state, even United Way is requesting more and more reporting. So it is not just your federal or your state government entities.

Comment 118: If you combine that with the high turnover that so many agencies are having. You are finding agencies that don't have the continuity to get their reporting right anymore and they

have people come in and they are trying to figure out what is this grant and what does it do. What is that grant and what does that do? When is this report due? When is that report due? How do I open my APR and he snaps I don't know. We have people that spend weeks trying to get their form open. So because they are brand new. In the COC we are constantly reeducating people about what is the COC and what is the process and how does this all work. What is the system itself and we have people that are struggling to learn just what their agency does much less understand how the system works together. So we have a real lack of continuity and cohesiveness that is needed now more than ever.

Comment 119: Not to mention not only dealing with on a COC level, we are known dealing with this caveat called coordinated assessment. We are trying desperately trying to figure out how we do everything in accordance to HUDs standards. It is and we are still at a loss. That is becoming and it is becoming one of those we are going to mandate it and figure it out. It is really hard for all of us because we already report in two or three or four different areas and it is when you have to hire a full time person just to do you data for you are taking away from who is in need and that is your clients.

Comment 120: Most data people are not as cheap as others.

Comment 121: We need translators. We can't afford to hire that person. It is ridiculous.

Comment 122: As a church in our town we are looked at more for the answers and the solution to everything. Unfortunately we can't handle everything. We don't get the funds to handle everything. It is easier for me to raise funds for our food pantry than for rental assistance and all of that. People can grasp food and the food pantry a lot easier than lodging someone who is homeless or passing through to go out west or deflecting to Fargo. Not all the churches in town support me and we have conversation with our city many times and it is hard to even get a conversation going. It seems like many times they do not want to admit that homelessness is there and it is just go to the Salvation Army and they will take care of it. Unfortunately with rents going higher and higher and $700 to $1,000. The money that we have doesn't go far. Our fund raising gets harder and harder each year as there are more non-profits out there. Everything we purchase we pay sales tax on too, because we are considered first a church.

Comment 123: In of the other problems I see too and to borrow a phrase, all of these agencies are up to their eyeballs in alligators. That leaves them very little time for planning. So at a time when planning has never been needed more, we are finding all of our providers with they have one finger in the dyke to stop the flood and the they have the other hand running a fire hose to put out all the fires that they are dealing with on a day to day bases. That leaves them very little time for the long range strategies that we need to really effectively address this. I am just happy to see so many people here today for this session, because it is critically important and you have some of the state's best in the room right now.

Comment 124: What else can we do as a follow up to make your report stronger?

Rob Gaudin: That is a really good question. I would like you to have those homeless numbers by region and why I and Adele and the staff talk about that. Don't, we have a meeting planned for right after this?

Comment 125: So are you talking, because we will be doing another Point-in-Time in just a few weeks.

Comment 126: We know the details as well in Region 3 had the reservation we were able to get. Region 2 and 8 aren't reporting as much because they are completely inundated.

Comment 127: Just the households that we have reported have more than one.

Rob Gaudin: So that total is greater than this total. This is the one that is reported in the COC to HUD. This one we got else ware, the Department of Commerce Homeless data.

Comment 128: We had an incorrect spreadsheet out there for a while. This may fall right on my shoulders for attaching the wrong file.

Rob Gaudin: That is alright.

Comment 129: If for instance in Burleigh County we are able to when it comes to FMR rents, he is able to ask for an increase because of X,Y,Z and we are able to go to 125 percent of what the FMR is. Do we have the ability and would any of these funding streams go back and say because of X,Y,Z we are asking for 125 percent of the allocation, because we have gone from 400,000 people to 800,000 in two years. Our shelter counts are increasing and our numbers of individuals that we can serve are decreasing because of this. Is there any way that we can come with an adjusted, a onetime adjustment because of the.

Rob Gaudin: I think you should offer the perspective of how many touches you get. That is an aggregate in a year. That is what you could provide and we could make that case in this document.

Comment 130: So are you saying that when we submit our 1231 information to Adele that we not only include the number of unique individuals we serve, but the number of touches we serve as well, because that….

Rob Gaudin: I am not advocating that for Adele.

Comment 131: It used to be on the report.

Rob Gaudin: For my purposes if you were to report it to me then I would include it in the document to say OK we have a smaller population, but they are served more consistently throughout the year.

Infrastructure Focus Group

Comment 1: I would say 3 or 4 sounds about right.

(Presentation)

Comment 2: Yes.

Rob Gaudin: So these groups like the elderly are going to continue to decline?

Comment 3: No, grow. The baby boomers are going to start retiring.

Rob Gaudin: How about these?

Comment 4: They are going to grow at a more moderate rate.

Rob Gaudin: But it is not going to decline anymore.

Comment 5: No, I don't think so.

Comment 6: I think it depends on your growth centers, your needs, and statewide population. You are still going to see growth in population areas.

Comment 7: I just have to say something about those statistics. The whole population 5 to 19 is at a negative 15 percent.

Comment 8: As of 2010. It would be different now.

Comment 9: I know that is four years ago, five years ago. The schools that we are building and the amount of births that we are having, I think that number is a little bit off verses everything that we are experiencing.

Comment 10: Today?

Comment 11: I would even guess in 2010.

Comment 12: Does this include nonresidents, because that is what we are seeing here. We are seeing a lot of nonresidents and they are not residents of North Dakota and are they being counted in the population?

Rob Gaudin: This is a Census count so, if they are at hotels or a man camp they are not residents. They have not established residency here through a driver's licenses. Maybe their family is still in Texas or Oklahoma. Then they are a resident of Texas or Oklahoma.

Comment 13: I think that another thing that we have to point out is that this is the non-entitlement areas. It doesn't include Bismarck, Fargo and that is where that population has grown.

Comment 14: I just thought that negative 15 was a little bit high.

Rob Gaudin: Like I said this was a little bit older data, but this is what occurred through 2010. We see from this previous diagram and this particular area here we are in 2010 and we don't really have as good information today.

Comment 15: The entitlement areas are the NSA right?

Rob Gaudin: They are the cities of Bismarck, Fargo, and Grand Forks.

Comment 16: Does that include Cass County?

Rob Gaudin: Does not.

Comment 17: Speaking specifically for Dickenson our fastest growing population right now is 9 to 29 years old. We have expanded two schools and built another one. We are expanding that one again and we are breaking ground on a new middle school. Our younger population is what is growing the fastest in western North Dakota as opposed to the elderly. Because of rent and other dynamics we have actually lost older population.

Rob Gaudin: So do you think that will continue?

Comment 18: Unless rent is able to be effective in a positive way. I mean lowered. Yes I do and I don't see that changing for a while.

Comment 19: The other part with the senior population and without medical care and we don't have hospitals throughout the area that we can easily get to. That elderly population will be leaving more rural areas. So that becomes a big thing, nursing homes and those basic services. So we take a look at our jobs. I think one of the huge economic development problems we have is we have a lot of people are ready to retire. We have many of the young that is going to come back and move into these rural areas.

Rob Gaudin: So I am gathering that this particular group in its entirety you expect it to continue to decline relative to the rest of the population.

Comment 20: They like rural non Bismarck, Fargo, Grand Forks, because as a transportation driving. The number of them from our region that has someone else drives refuses to go into Fargo. So they would prefer not to live in those three big cities. So the strategies and the action we can take from holding our large three cities or four cities growing by different actions that we take within the state, because they don't want to move to Fargo. They don't want to leave their communities, but for medical reasons and some of this they will. The cost of living in the community and having lived in western North Dakota the majority of my life, the out pouring of people from there to everywhere else is very sad, because they no longer have their community.

Comment 21: In West Fargo we have a continual shortage of elderly housing. We have a very fast declining availability of resources for low-income family housing. We are growing by leaps and bounds for elderly, school children, the whole population gamut. We are probably at 6 percent per year growth. We were at 7 percent the last decade.

(Presentation)

Comment 22: I see the four or five, but the seven person.

Comment 23: The bigger homes are typically people that are moving out of their middle class homes and into a higher or larger facility. Their families are growing, which opens up the house for the lower income families to move into. So it is that cycle where you start out in a small house and you buy a bigger one and as your family grows and I think that at least in Valley City what we are seeing are the bigger homes. Which in turn then opens up some opportunities for others in town, but I would agree with those percentages what we are seeing are the bigger homes being built, because they are probably the only area of the economic scale there that can afford to do it.

Rob Gaudin: The bigger homes are being built. Traditionally has time has gone by homes have gotten bigger, but are they housed by larger families?

Comment 24: Oh no. I think they are capable of handling seven people, but I don't, how many seven person families do we have today?

Comment 25: I think the number of households is more telling than the percentage on this one, because if you look it is only an increase of 12.7 percent, but it is only 200 houses throughout the whole state. I think that is more telling. I haven't noticed that is something that we are needing. It just happens to be that it is such a small number that the percentage is huge.

Comment 26: I know in our community any time that we have a low-income family that has three or four children there is almost no affordable housing for them.

Comment 27: That is correct.

Comment 28: You have one and two bedrooms, but you have nothing that can house a family with children.

(Presentation)

Comment 29: I hate to say this in the shadow of the Department Of Commerce, but we look forward to an unemployment rate of 2.9 percent. We are at 1.1 and have been there for two or three years. It is extremely difficult to hire people at 1.1 percent. So I look forward to 2.9.

(Presentation)

Comment 30: In the short term you will for sure. They are going to sack staff.

Comment 31: There is always a lag time between unemployment and those businesses leaving. If the oil companies pull out those guys that are connected to the oil companies so they will leave. It probably will not have a large impact on the unemployment, but it is the service industry that will be affected more quickly like fast food and all of that. There will be a lag time. Looking in the future it is going to have a huge impact and the slowdown in the oil fields and an increase in the unemployment rate. I don't know if you have a crystal ball.

Rob Gaudin: I spent my early career eating a lot of glass. I will say that you are correct. People will flee the labor force, like leave the state and are no longer in the numbers.

Comment 32: I think in our part of the state we have seen a little slowdown, but not really a lot. You see a lot of people that are fleeing the area this time of the year, but we also have a lot of people that leave because of the holidays. I don't see too much of a decrease in terms of you know that oil has gone down and most of the people are working production and production will always be there no matter what. Everybody is saying that the drilling will only last another five or ten years. People that I have talked to that are in the oil field say that we are looking at at least another 15 or 20 years at least. So in our part of the country I don't really see too much of a stall at all, maybe a little increase even though it may slow down it just hasn't happened yet.

Rob Gaudin: So am I hearing this correctly. You would like to see a slowdown.

Comment 33: My personal opinion yes.

Rob Gaudin: How many slowdowns do we have here? The recording can't record your hand.

Comment 34: On the eastern part of the state in Fargo and just from being around town. I mean there are signs in every establishment looking for people to work there. That is on the far eastern side of the state where there isn't oil.

Comment 35: (Inaudible) over the summer the greatest percentage of jobs open was in Cass County. It was significantly higher than anywhere else in the state. So there are a lot of jobs open all over the place. The labor force is a big issue.

(Presentation)

Comment 36: I am just thinking of the correlation between the income going up as well and how that effects, because rental rates have gone up at least in western North Dakota through the roof. There are surveys that were done that Williston was the highest in the nation Dickinson is the fourth highest in the nation. The rental rates are crazy, so I am surprised that this is at least in western North Dakota.

(Presentation)

Comment 37: We have been hearing for a long time all the rental rates just sky rocketing in western North Dakota. It is interesting to see that number as low as what it was. I even thought it would have gone up higher than the 2012 number.

Rob Gaudin: I was reading in yesterday's paper some things going on it did talk about rents being $1,400. I am not surprised.

Comment 38: That is really cheap.

(Presentation)

Comment 39: I am not sure that I understand you question. So if you had a dollar how would you allocate that dollar to each of these?

Rob Gaudin: Yes, that is right.

(Presentation)

Comment 40: How can you pull out water systems from infrastructure. You don't see water as infrastructure?

Rob Gaudin: Water is infrastructure, but I want people to talk about water systems in particular and then other infrastructure.

Comment 41: What do you include in that other infrastructure?

Rob Gaudin: Usually those are buildings.

Comment 42: Fire stations, city halls, park and rec, schools. If you don't have the other stuff than you can't have a house. If you don't have water, you don't have streets, you don't have power.

Rob Gaudin: That is true, but you can have a terrible water system and have a much greater need for housing. Be under EPA guidelines for improving your water system. So there are water system improvements and not just creating water systems. So the question is are these prioritizations really correct? Is housing number one and infrastructure number two.

Comment 43: I personally don't know how you separate that, because you are not going to have anywhere to put housing if you don't have the infrastructure there.

Comment 44: It's the old problem of I can build the house that I want, but if I don't have water or streets to get there.

Rob Gaudin: So it is all the same? This should all be equally except for all other human services.

Comment 45: I think infrastructure should be first. If you put the infrastructure in whether it is public or private investment for housing and economic development that is going to follow, but until you have the infrastructure then nothing is going to get in.

Comment 46: There is a certain mantra that says infrastructure is economic development. So I am not sure how you separate out the difference. What is economic development in this infrastructure?

Rob Gaudin: Well we will see how the survey views that in a moment.

Comment 47: I believe though too that when people are just filling out the survey and the say what is most important, of course then say housing, but they don't think about that you need that other part first before the housing can go in. They don't think about the infrastructure side of it.

Rob Gaudin: Let's say that the infrastructure is there and the city is there and we need more housing. Maybe we need to tweak it if there is a certain limit so I have concurring with here when people are thinking housing. The question I am asking you, do you want infrastructure to be number one and the answer must be yes.

Comment 48: If we said no we would have the wrong group.

(Laughter)

Comment 49: I would have to add to that that not only the extension of our existing infrastructure or increasing the capacity of it, but also replacing existing infrastructure. All of that takes finances and energy away from housing, if you will. If you don't take care of your infrastructure, older infrastructure then you really don't have anything as an end result.

Comment 50: In west North Dakota when the boom first started there was a huge need for housing, but until cities or private development had infrastructure, housing did not occur until they put the infrastructure in and then you saw the housing coming in.

Comment 51: I can tell you that our building permits are lower than they should be and the demand is, because out infrastructure can't build out as fast as the houses can.

Comment 52: It is still to a certain degree most of them and they are starting to catch up a little bit, but they are still behind.

Comment 53: So what do you do now is take that survey and put infrastructure first.

Comment 54: In most instances the infrastructure goes in and we are seeing a lot of these developments and it doesn't take very long for them to fill once the infrastructure is there.

Comment 55: I also think infrastructure is a confusing word to the general public. We are all builders and involved in the community and economic development. We understand that a little bit better, but if I asked my mother or grandmother to take the survey and if we would ask them about infrastructure they wouldn't correlate it the way we are.

Rob Gaudin: You go over and turn your faucet on and that is the first time you think about it.

Comment 56: Under your survey that is water systems. (Laughter)

Comment 57: We are just a waste water treatment fitted in under water or infrastructure?

Rob Gaudin: That would be under water.

Comment 58: Really?

Rob Gaudin: How many different categories do you want?

(Laughter)

(Presentation)

Comment 59: It has to be balanced. You can't just do road improvements without balancing with your water and sewer systems. I mean you can't fix a street and then five years later replace the waterman. You have to do that balance. Well you can, but good luck on the commission.

Comment 60: Just watching what has been going on in the region and such, when you look at the street and road improvements and the sidewalk improvements. We haven't had any money to put

into those because we are so busy doing flood, water system, sceptic, sewers and all of those other things. You can't put your money into those top two things because we have to keep the rest of our infrastructure running. That is where the majority of our entities have been putting their money into. I mean even in Bismarck which is not in this part, but I was feeling bad about my region, but and I drove here and thought they are not doing their streets either because we have to keep our water and sewer running.

Comment 61: I would say looking at this the general public when they see street and road improvements they are thinking highway DOT type road improvements because that is what you hear a lot of.

Comment 62: I thought pot holes. I will just take a look at all we have to do for water and sewer, but we had to get those done before you touched any of the roads.

Comment 63: You are absolutely correct and you don't have the money to do all three and that is the issue.

Rob Gaudin: You are right. You don't have enough money to do everything at the same time. Going back to the first slide, you can't do everything. So should we do this first or should we do a crisis management which is the thing that is broken the worst fix first.

Comment 64: That is where we are at.

Comment 65: I think we have to make the investment in the basic infrastructure that you need, because having worked in western North Dakota for all of those years where we fought to put money into these towns that everybody said was dying and make sure that we have water and sewer and we put that money in. Every one of them filled up when the oil came. So when you have that basic infrastructure you will have people living there. I think if we believe in even rural North Dakota we must make sure that are rural communities have a sanitary, sewer system, good water system so people could live there or we will not even have our Ag because we won't have our Ag workers living that community either. So that to me is that philosophical focus. Do we want everyone in our major cities or do we want to sustain a rural community with a rural infrastructure?

Comment 66: Our part of the country, west North Dakota we have all of our small communities that five or six years ago had all kinds of lots available in the community, but now they are all gone. Some of them can't build because there is no infrastructure. They won't build, because of that. So until we repair or replace infrastructure, you are not going to see the level of building that we should be seeing in some of these small communities.

Rob Gaudin: How are you defining infrastructure?

Comment 67: Water/sewer.

Comment 68: And streets.

Comment 69: You look to see the oil. Their infrastructure is at least 500 million the last I have seen. There is probably quite a bit right now.

Comment 70: When you take a look at we are putting in infrastructure like drunken sailors. It is going in like great guns, because there is a demand today. Everything needs a special assess. When you are taking a look at the assessment center of 50 or 60,000 per lot for homes. There will come a day when all kinds of red flags will go up say when the house goes on the market and we can't afford it.

Comment 71: I just recently held a meeting about our Regional Plan and so it was mostly rural that were in that meeting. I think it makes a difference as to what they say is first because in their minds everything goes along with it. So when you have a discussion and I found it interesting when we started talking about housing which is at the top of your list on the other slide. They were talking about housing and actually in one small town an economic development corporation had recently built senior housing hoping that the senior would move in and the smaller homes would be available for families and it worked very well, but they don't have any more places that they could build another one because of infrastructure. So the ultimate goal is the housing, but they know they need the water and sewer to get out to somewhere where they could even build it. They need the streets to bring the people there. What they are talking about is housing first and so that is but all of those things have to come. So it all filters in I think sometimes is that they want this done, but and you know sometimes with streets, but the last thing is they replace the streets because they have to deal with the underground too, because that makes sense. If you are going to dig it all up you should do it all at once. So I think we can do all of that to make it new. That is the ultimate goal is to make it look new, but all of those other things fall into place too. Sometimes I don't know if you are getting...the level is there. You do when you have a discussion, but not necessarily what you want to have happen.

Rob Gaudin: What I keep hearing over and over again is crisis management and it is water and sewer comes first.

Comment 72: Most of the infrastructure that was put in was put in sixty or seventy years ago and that was from USDA and it is aging now. So what do we do? The areas are all in the same boat.

Comment 73: We have miles of it. The one thing you asked and your Consolidated Plan objectives you say expand economic opportunities for lower income citizens of the state and I think you could put a subtitle in there of special assessment relief. I think that would give cities a lot of flexibility to work with the citizens to help them if there was something about that. Right now we have the Homestead Act right and you can have people on limited or fixed income can actually have all of their property taxes relieved. Basically taken off, but the special assessments they do not do that. So if we were to do something in this manner as these costs are sky rocketing it is amazing how much it costs to put sewer and water and streets in for residential area. A special assessment relief would allow one of the lower income families to be able to afford, better afford housing in a residential area.

Rob Gaudin: That would be to the legislature?

Comment 74: It could be to the legislature. It could be CDBG.

Rob Gaudin: Let's remember that CDBG has 3.7 million.

Comment 75: Yeah, but we need to fix that too.

Comment 76: I would put forth the premise not knowing who your 180 people are, but I would put forth the premise that this is more a reflection with the dissatisfaction with those types of services. People take for granted that their trash is going to get picked up. That their water is going to turn on when they turn on the faucet and that their sewer is going to flush. It looks to me like that is what is happening here. It is more of a satisfaction survey than it is a needs based survey. They drive on the roads every day and they complain about potholes and they complain about snow removal, and those types of thing, but they don't see…

Rob Gaudin: I grant you this, that this does not measure the resident who is yet to move here because they can't find a house, because there is insufficient infrastructure in place.

Comment 77: Of the 180 people and I agree with him is with their water turning on and it is about their toilet when they flush it, but they drive on your roads every single day and that is what they see the most. We are paid to think about water and sewer and all of that stuff, but John Q. Public is as long as it works I don't think about it. I turn on my water and I take a shower in the morning and thank goodness.

Rob Gaudin: The same argument comes out in every jurisdiction when I address infrastructure. If it works it is invisible and it is incumbent upon you guys as professionals in the field to help with this. To help get others of your peers to participate in the survey so help us to help yourselves if you will. Other comments or concerns about this?

(Presentation)

Comment 78: I have a question on a previous slide. Where is mental health in here anywhere?

Rob Gaudin: Mental health services?

Comment 79: Not just for city administrators, but…

(Laughter)

Rob Gaudin: I don't have the slides for economic development or some of the other stuff here in this presentation, but it is contained in a special in needs category and we will see it eventually.

(Presentation)

Comment 80: I don't know how you say that. If you take a look at your numbers before that is the largest demographic right now is between, I don't know what it was. Right at the cusp of retirement age is the largest group of demographic in North Dakota. I think it is 130,000 adults and they are now going to be progressing into the retirement side of that. I think that that is a good statement. That I think it is going to happen. We are going to see more and more elderly in our communities. Not less. So I think that is a good statement. I would leave it in.

Comment 81: In our area of Williston a lot of our people are becoming elderly and they are moving out. They are moving east or out of state period.

Comment 82: It is unfortunate but that is happening with the rent situation and selling their homes. They are going out of state or east.

Comment 83: Or they are going to other non-entitlement communities. We see a lot of them coming into Amidon from Dickinson, Williston. They are not necessarily wanting to go, but as you said they want the smaller. They want to go to a smaller community to a smaller community or they are going to where their kids are in Minnesota or Texas or where ever that is.

Comment 84: Your statement on increasing large households. I think everything I have seen in the last five years is that household numbers are shrinking and not getting bigger.

Comment 85: What is large households. What is that?

Rob Gaudin: Usually that would be six or more or seven or more.

Comment 86: So mom and dad and aunts and uncles are staying with the family.

Rob Gaudin: Typically there was some doubling up in the economic recession that didn't happen here, but I typically and my position with that is immigrant populations and Hispanics especially tend to have larger multigenerational households and that is what is driving it.

Comment 87: OK. That makes sense.

Comment 88: We are also seeing the African population of Somali with the same trends of larger households.

(Presentation)

Comment 89: I think there are a lot of people out here that says it is nice to take a break.

Rob Gaudin: So what effect does this having cutting in half of the barrel price going to have?

Comment 90: If you look at the resources that the larger companies and they are telling you that they are going to cut their investment. So we are going to see a decrease in the average of about 180 wells in western north Dakota to go down to something like 100 and some people are saying 80 wells. That will have an effect on population and drilling in the big four producing counties is going to need at least impact, but in the fringed areas. The Baltas, the Bowdons, that is going to go down. That is where you are going to see declines or decreases in jobs. People are going to get laid off. That will happen in the short term. They will have to get back up to a price about 60 or 70 to get back to I'll call it normal.

Comment 91: They stabilize at 70 or 80 I don't see that. My wife is at the direction end of it and they are saying post production will be there forever.

Comment 92: If the well is there. You are right. That is a 40 year producing well most likely. We have wells in our city limits that have been there over 45 years. It takes a certain amount of people, one to two people per well to service a producing well. We already have 1,200 producing wells on the way to give you a number 40. It depends on who you talk to.

Comment 93: Are they talking about just stacking the wells or are they talking about just pulling them out of state, because if the price goes under $40 they are not drilling anywhere, right?

Comment 94: It all depends on where you are at.

Comment 95: The big four, they are going to drill at 40, but the fringes are going to sack those rates.

Comment 96: But they are not going to pull them out of state?

Comment 97: Some will. I think some will.

Comment 98: If you look at the data that was produced by Glen Helms, they are saying it is at 70 to 80 percent of new drilling will actually happen under $65. So you are going over one well and add to a four well pad or something like that.

Comment 99: Twelve, 16, or something.

Comment 100: Twenty four or whatever the number is. So the places that have wells are going to see a higher concentration of wells rather than new wells being drilled in the fringe areas. That is why I don't think you are going to see the big four counties a big decrease.

Comment 101: My question was will they pull that due to the wages being paid if this continues? Will the wages go down? Will they stay the same?

Comment 102: I think the first impact you are going to have is going to be on the benefits. They will stop paying for housing. They are going to stop paying for those kinds of things like the flight back. They are on a two week schedule and they are not going to pay for the flight back to see your family anymore. I think those are the things that you are going go see first before you see wage.

Comment 103: We have a number of people living in our area working in Williston and the oil patch and such and so we have lost all of those employees in those small towns and our communities that are going that way. So will it be cost-effective for them to travel that way and they will come back to look for work in their home base.

Comment 104: After benefits it will be overtime and that is when you are going to start to see it is when they are not getting the overtime. Their wages, their base wage is probably $50,000 or $60,000 a year. They make $90, $100 or $110 because of overtime. That is where it is going to start. That is my personal opinion.

Rob Gaudin: So to summarize that we will see this slowdown.

Comment 105: I definitely think so in the short term.

Rob Gaudin: But not a decline?

Comment 106: That is my opinion.

Comment 107: The unemployment type thing when they quit going that far they come back to the community now unemployed looking for another job. So that will be where some of the numbers may change or may not depending on how much as you mentioned they need at least four people to work. They will come back and look for a job in Cass County.

Comment 108: To me a city like Valley City on the eastern side of the state, we are riding the coattails of these guys on the western side of the state. Their income to the state coffers provides an opportunity for industry to have low taxes and an opportunity to build in North Dakota and expand. We are seeing that between Jamestown and Valley City now. We are seeing an opportunity for business to take an interest in North Dakota. So Valley City is in the same boat. We are looking forward to seeing that and that is a benefit or a coattail if you will of the oil boom in the western part of the state. That is always after the fact. After the state gets flush with funds. After the state legislature starts putting in business incentives online and things like that. The discussion for eliminating sales or state income tax is a great incentive for people to come to North Dakota. So I mean these things balancing together that is where Valley City is seeing its growth potential. Oil fields will hopefully be able to stay open, but with the amount of oil in the ground, I don't think that is going to be a problem.

Rob Gaudin: I think we have addressed each of these and if there are other concerns that you have I want to hear about it. The key infrastructure we are talking water and sewer.

Comment 109: And roads.

Rob Gaudin: When you say roads are you talking about streets in the city?

Comment 110: Yes.

Comment 111: I agree.

Comment 112: I think with the decrease in Federal highway money that directly impacts our internal urban streets and your local communities are going to have to start picking up that percent that normally would be picked up by federal or state sources. That is huge number to start expanding your infrastructure out or even repairing existing streets. So streets are very important along with water and sewer. When you see the decrease in money, the price of a barrel of oil and how it effects the region's Trust Fund and how far it goes to help pay for grant money for water, grant money for flood control, grant money for running a pipeline from the Missouri River to the east, all kinds of those things the funds there will be significantly less for affordable projects.

Comment 113: I would also submit to you that population being that public facilities like fire stations, police stations and things of that nature, public works facilities. We built a public works facility and we are in the process of building a fire and police facility. We have two more fire substations that we are going to have to build because of the expansion. Those are all needs and they are not cheap and the type of equipment that is put into those facilities is not cheap either.

Comment 114: It would seem to me that as you see somewhat of a slowdown the developers that are willing to make the investment in sewer and water are not going to take that jump because the risk is high. So they are going to say that either there is no construction or the local unit of government pays a higher cost or takes on that added risk. If that doesn't happen you will have a

pronounced effect of need for housing facilities, sewer, water, and infrastructure. Financing is going o be key and it is hard to come up with local financing.

Comment 115: I agree completely there. Right now we don't do special assessments. We are not seeing any kind of special assessment that West Fargo has. We are seeing that in what we call water top storage tanks. That is a system improvement. It is building to your capacities and your treatment facility. We spent $45 million dollars in our waste water treatment facility. That is hardly special assessment because it was the whole city as a special assessment district. That is where our debt is coming from, but we are relaying on your developers to put in your local infrastructure. So they are paying for the road inside their development. They are paying for their waterline. They are paying for the sewer line. They are paying for all of that. If we have to take that on I don't know if we can for those communities on the fringe that are still special assessing above ground infrastructure, you streets, your street lights, your storm sewer, and things like that. Our commissioner has been considerably weighed as to whether to continue that practice or not because as you look at the city is taking on that debt that developer comes in and pays for the underground and the city takes on the debt for the above ground and also you have no one building houses and you have no one moving into that area than your community is stuck with that now.

Comment 116: Those infrastructure costs are skyrocketing. He mentioned special assessment $45, $50,000 to that even before your can build your house. It wasn't five years ago they were $25, $30,000 so those number are just skyrocketing.

Comment 117: If we are to discuss position for smaller more rural communities to provide for access for people to stay or incentives for people to stay the issue that we have is economies of scale. Where you do a development and people like to come in and 400 lots or 200 lots or 100 lots in the city Valley City size. You know 6 or 7,000 people. That is you are throwing money in the trash can. There is no way you are going to fill that many lots even if you have tremendous growth in our city. So what we need is some help in incentivizing if you will developers to come into smaller communities such as Valley City and say OK we will develop 15 lots this year and we will have a plan to continue to do that as the city grows and fills it in. it would make a tremendous difference for us economically and for other towns. You know 15 or 20 lots are not a big deal, but for us it is a big deal, but you can't and the cost per lot when you do such a small project is much greater than something if you could do it large scale. That is where our issues are coming in. You can't grow as fast as especially out in the west as they are seeing it, but we need to have additional housing. To find people willing to invest in that it is a risky endeavor and it does cost more per lot.

Comment 118: On entering things from working with an engineering consulting firm and trying to find funding so the developers come to us and ask if there is any kind of funding sources that can help make developments. Yes there is, what is your development? I want to sell 350,000 homes. Well conversation over, because we can't use federal and state programs to help you make a very large profit. If you want to talk about low income or diversifying you residential mix, then there is opportunities. I think that is one of the toughest too, is when we work with developers that even when we have these 15 homes come in and they are these $300,000 homes they are still not meeting the needs of the families with three or four children. The low-income. There is still that big deficit in growing communities with community needs for that population.

Rob Gaudin: So do these communities that you are referring to.

Comment 119: It is with the whole state.

Rob Gaudin: OK, do they take a mixed income approach or it is only the $300,000 home?

Comment 120: Either that example is developers are thinking there is a lot of opportunity to come in and build all of these homes and it is just a reoccurring conversation that I am exposed to. Can you help us to find money to help to pay for these? There are not too much special assessments where they can turn a profit, but they are focused on getting the large single family homes instead of…

Comment 121: Valley City right now is building a million dollar home in one of its residential areas. It is great and thank you, but it is not helping our housing issue.

Comment 122: When do you move in?

(Laughter)

Comment 123: There is money there, but it is tough to get people to invest. That is the issue. I don't know how we can do it and we are so focused on our own infrastructure and add to that flood protection, Valley City gets very very complicated very very fast and now a wellness center, why don't you just shoot us now and get it over with.

Comment 124: I think when you talk about public facilities look at all the communities in North Dakota that have now either passed or about to pass or take the vote in additional half a cent or a cent sales tax to build a hospital or a clinic or rec center. In Valley City, did it lose by one or two votes or win by one or two votes?

Comment 125: We actually won the popular vote for that measure to do a half cent sales tax to promote permanent flood protection and a wellness center. It is the rest of the money for the wellness center that we are having a little bit of a problem finding. It is what it is.

Comment 126: So trying to find a way to fund public facilities that people do not want to throw on the property tax. Like an ice hockey rink and stuff like that, but what we are talking about is trying to find a way so we don't burn the property tax account.

Comment 127: You can't and I will put this in perspective for you. I brought our list of capital infrastructure. We are a community that levies about four and a half million dollars of property taxes a year. Our infrastructure needs in 2015 $236 million dollars. You can't property tax your way out of that bill. There is just absolutely no way. So alternative revenue streams have got to come to the table in order to make that happen, that level of work happen. That by the way is the number for the last two years and will be the number for the next three years or something similar to that.

Comment 128: Williston number is a billion dollars over the next five years and ours is real close to that. That is all infrastructure. As I said earlier that doesn't include local lines and local within development costs. Those are all taken on by the developers. We have really high lot costs.

Consolidated Plan Public Input Meeting

Comment 1: Certainly historically homelessness in North Dakota has been centered in Fargo, Bismarck, Minot, Grand Forks, but with the changing economy and the development in the western part of the state particularly Region 1. Homelessness is becoming more and more of a rural phenomenon and so getting people out into all of the remote areas of the state. Getting someone to go and look under a bridge 30 miles outside of Dickinson, North Dakota is really tough. Some have changed our methodology to where the sheltered count comes from HMIS. Our HMIS system has got above 90 percent bed coverage and excellent data quality. So we are confident in that, but with our volunteers we focus into counting in the rural areas for our unsheltered. Our unsheltered we used to be able to count on our fingers and toes. We can't do that. We can't even come close to that anymore. I do believe that 13 was the peak and that 14 saw a downturn. VA folks on the ground have indicated that they are finding a lot less homeless veterans in western North Dakota, but still we are more than double of what we were at the beginning of the oil boom. So even though we may have turned the corner a little bit and I like to see two and three Point-In-Times confirm that or I say it is not just an aberration or something that had to do with the weather that day or that kind of thing, but even though there has been some improvement we are more than double what we once were and a lot more unsheltered.

(Presentation)

Comment 2: Doesn't it make sense that the reasons that they are really high is they all have homeless shelters. So Region 2 where I am from we don't have a homeless shelter. So to me it does make sense that the homeless are heading in those directions.

Comment 3: To add onto that after the Minot flood you guys had the highest homeless population in the state. So you have done a lot to recover from that, but still there is some validity to the fact of where there is a homeless shelter we can easily access that data and where there isn't and people are unsheltered it is a much more difficult to get that accurate a count.

Comment 4: Speaking for Region 6 the numbers are far higher than what we are dealing with. When are they doing the count? If you are doing it in the middle of the winter they are staying with someone else or they are hidden, because we do not have winters where you are going to live outside under a bridge. So the challenge becomes we have all of these people, but where are they? We have a part in Jamestown where people are living in their cars. We have this homeless population with no services and with nothing where they can go and get counted and get services. That is my biggest community, the rest of our areas there is nothing for service. So they are living with someone else or with friends or from house to house to house.

Comment 5: The comment on the timing of the count is something that we get all the time. The timing of the count in my opinion could not be worse, but the timing of the count is a HUD mandate and we have done a summertime count as well. We started this in cooperation with the states of Minnesota and Wisconsin about four years ago. We did this to try to demonstrate to HUD that the timing of the count does a disservice to northern states, because of exactly what you are talking about. We have discovered higher numbers in the summer. Probably not much higher as we maybe would have guesses, but certainly higher. The issue of what agencies are within a region that are able to do the count is really a big big challenge. If you have an area that historically has had very very low homelessness they have very few agencies in that area that respond to

homelessness and giving us a much smaller pool of volunteers to choose from. These are basically agency people who take a day off of their normal work duties to do the count. It has been a real challenge in places like Jamestown, Devils Lake, and Williston. In Williston the very few providers that are there are so busy that they can't even begin to do the count. So I have had to actually send my own staff people out there to conduct the count. We can't do that everywhere, but because of the changing locations of homelessness to the more rural areas and to areas where historically it hasn't happened, getting that sort of volunteer pool to get out there and do the count is really challenging. Guaranteed undercount in those areas.

Comment 6: I tend very much to agree with you. At the same time that you saw the Bismarck Tribune article of 2,300 homeless children in the State of North Dakota and you look at the methodology that was used and you extrapolate that to the whole population their methodology would show 20,000 homelessness in the state of North Dakota which would include every cat and dog. My neighbor who had his kids and grandkids by their definition and the kids own horses by the way, are under the definition of homeless. I think those kind of statistics are prone to be a determinate. I think everything you said makes absolute sense, but you are being very conservative in your approach. It has a grain of truth in it.

Comment 7: Our approach is really mandated by HUD. It is very strict methodology that we have to use and it is important to understand that in any count there is an operational definition of homelessness that is used. In DPI they use the department of education definition, which is not the same as HUDs definition. We are bound by HUDs definition which means you are literally homeless. The DPI numbers are always much higher than ours. If you compare then side by side you will see on any given day there are 450 homeless kids in Bismarck and in public schools and them you look there is only 1,258 homeless people in North Dakota, well that doesn't make sense. So people get confused because they are getting data using different methodologies and different definitions. Then that is that big challenge for both DPI and us to explain why our numbers are not more consistent with each other.

Rob Gaudin: Fortunately I am using one set of numbers.

(Laughter)

Rob Gaudin: But you don't have the shelter, but my belief is your population is probably larger than that.

Comment 8: It is important to know too those are households and not people. So the individual is going to be considerably higher.

(Presentation)

Comment 9: Can you explain what low need, medium need and high need is?

Rob Gaudin: Yes, I can.

(Explanation)

(Presentation)

Comment 10: I took the survey and I guess I wish those things would have been further defined to give us a little more guidance on what is low, medium, and high. On the previous slide where you listed infrastructure and then water systems and then public facilities, traditionally CDBG has put all of that under public facilities. I am a little confused on why it is broken out into multiple categories now. That wasn't really defined. Infrastructure really is water systems and public facilities.

Rob Gaudin: These things here and maybe this and that too can all be considered one category, but we have given additional detail maybe waste systems and infrastructure should be added together, but infrastructure includes street and sidewalks and a variety of other things that are not related to water and sewer systems. So it is just an indicator. If you are a desert state you want to see this into water capacity. This into sewer and other various. So it gets to be too many details. We try to keep these…

Comment 11: Housing is listed as one category. Infrastructure is listed as three categories.

Rob Gaudin: Yes, but we still have people voting for water or other infrastructure, public facilities. I think we still get from these categories what people want to do. Infrastructure, right here we have the infrastructure water, sewer and so on. This within that category we can see how people have ranked these types of activities. So what I am looking for from you in these housing and community development activities is how do you feel about these rankings? I think maybe we ought to have more first-time home buyers. Wait, no I think we ought to have homeowner rehab. This should be up here. Is that true to your Region?

Comment 12: My feeling is you have those four or five and they should be rated a lot higher because if you are just are just talking about your larger cities.

Rob Gaudin: These two right here?

Comment 13: No the homeowner, housing rehab. Your number one is you are probably getting your surveys out of Minot, Williston and Dickinson.

Rob Gaudin: None of those are entitlements.

Comment 14: You know what I am saying, because I am the director of the Community Action in Minot and we have a Home Rehab Program. So we use that money to go out and rehab single family homes out in these small communities. So the smaller communities have a much greater need for those 4 and 5 there than the number 1 that you have, but if you are talking about Williston or Minot for example of course they are going to want more new construction of rental housing, but the things that we do is go into these small communities of 200, 300, or 400 people and we rehab those homes. I think it is really important that those homes are the ones that there definitely need to be a high focus on. So to put that at 4 or 5 to me doesn't really make a whole lot of sense.

Comment 15: I was going to add onto that statement. I represent South Central Regional Council. In that area we have 60 incorporated small communities. The largest being Jamestown with 15,000, the next being Valley City of 6,500. We must rehab our single family homes and our multi-family homes, because we have old aging housing stock. We have had limited new building and unless you have some major economic impact like the west is having since I worked in Dickinson for 20 years prior to Jamestown. You have to have something like that in order to have new housing stock

built. We started quoting right now that it cost 210,000 to build a house we will never build another house in my area that is an affordable house that people can live at. So we need these funds to go in and rehab our stock so people can continue to live in these communities. The other part that is very important to me the needs to my region are the public facility and working on those funds. We also have a very limited tax base. Our properties are very low value, so what you are taxing isn't very much. The other part but it doesn't come up on this, but part of when we do the survey as North Dakotans we are conservative and we are very frugal. We should have marked everything high, because we need it all. We need the flexibility. We need to do what we need to do for who is at the table when they need it most and we have this project that needs to come forward. Economic development did not score high, but it is one of the huge tools if we want to keep people of all wage earning levels living in all of our communities and staying here. Our business is need assistance. Right now I am dealing with the community of Wishek, a town of 987 populations as of the last Census. They are losing their manufacturing firm. It is moving all 36 jobs, 36 jobs to Wahpeton. In order for me to bring something in and help CDBG and is a key funding source that I work at in this community. This community does not have natural gas. If I bring a manufacturer in they want natural gas. Last year's high propane prices just shocked all of my businesses that are out in these rural areas that are not on natural gas. My nursing homes, my schools, my small hospitals. We need to have CDBG HUD funds as a toll to help us to work with these communities. It is one of those places where it is a tool that in North Dakota it needs to be adaptable. It needs to be everything. I agree with him that if I realized the importance of it when I took the survey I would have ranked everything high, because when I need it in a community of a 1,000 or 300 or 600 to work on something here we need to have that flexibility to meet the needs to keep people afloat in our communities working and living so that all don't have to move to a large city for homeless shelters to have soup kitchens and stuff we don't have here. We need to make sure that this stays more flexible to meet the needs of our communities of 50 to 50,000.

Comment 16: I think and I would like to add onto the aging housing stock comment. That has been a big problem in North Dakota for a long time has been aging housing stock and as our population ages and as people my age the boomers enter into our senior years. We are going to see housing that is visitable and accessible for people with mobility issues and things like that and without rehabbing that aging housing stock seniors are going to be hard pressed to find places that are good healthy places for them to live. On the other side of that equation we have our young people which in North Dakota for many many years we struggled with keeping our young people in the state. They would get their educations and move onto other parts of the country for opportunities. Now we have economic opportunity in our state and the ability to keep our young people, but they don't want to live in grandma's 112 year old house. They want a new house that fits their lifestyle and their family and their demographic. So either that old housing stock gets replaced or it gets rehabbed to be something that is livable for seniors and acceptable for young people. I think it is very important.

Comment 17: Could you explain what on the list is high and low. Where is the cut off and is it listed in order from priority?

Rob Gaudin: I listed them by frequency from high need. So they decline from this level only.

(Presentation)

Comment 18: Is it special?

Rob Gaudin: No, the number of votes for those that said high need.

Comment 19: So based on this list, what are the priorities going to be? What would be labeled as a low need, high need, medium need based on the results of this?

Rob Gaudin: If you are going to use only this survey question and disregard everything else, like your input. They would be on this rank order. One, two, three, and four, but we already heard that is not appropriate and I said this is an aggregation across that state and it is not true at any particular area. So we need to balance the outcome from this with input that we get and other things that we know.

(Presentation)

Comment 20: Before you do that could I ask you to go back two slides?

Rob Gaudin: You bet. To here?

Comment 21: I have a big problem with this slide in that emergency shelter is not housing. It is a symptom of a lack of housing. In my opinion permanent supportative housing and emergency shelter should be flipped on that chart in terms of level of need. We need shelter, but if we had adequate housing the need for shelter would diminish greatly. Shelter is not a response to homelessness. It is a response to freezing to death. It is not a solution to homelessness. It is a symptom of homelessness. Homes are the solution to homelessness. Emergency shelter as I said is the solution to freezing to death. They are both critically important, but the existence of affordable, accessible housing, supportive housing would eliminate that need for emergency shelter. In fact at one time in the state Coalition Strategic Plan the idea was to eliminate most of the shelter beds in the state and turn them into sup portative housing beds so that people would have permanent stable place where they could begin to live productive lives.

(Presentation)

Comment 22: I think number 1 has to stay number 1. When you take a look at it. You can't build all new at the cost when you don't have enough people to build it. You have to preserve the housing stock that we have and we have to rehab. If we have to take all of our people because they can't live in those homes and move them somewhere else we have lots the core and culture of our communities.

Rob Gaudin: I am going to ask you a question that previously when you were talking I inferred from your commentary that you were talking about owner occupied.

Comment 23: I meant both multi-family and rental. I will be honest in my area we don't have any and the key part of going in we have USDA rural development build in the 70's with this housing. They need major rehab in order to keep them livable and such that you can look at it. That is one of the things that we are looking at in our Region that we could use funds for to go in and make sure that we maintain them. I mean both single and multi-family.

Comment 24: That is what we are looking at too. Our apartments where build way back when so maybe more updating and better accessibilities or more updating. We do housing for elderly and disabled. We are looking at and we do multi-family too. We need more updates that way we can get more people to actually want to move into our apartments. Right now everybody is saying that they are too small, because we just have one bedrooms. We right now we are have four applications out and they are from elderly that are not ready to go into the nursing home yet, but their kids don't want them living out in their farm. They are like we can't do this small of a place. If we could expand a little bit or more them somewhere like a one bedroom or a two bedroom I think that would help lot too for elderly and disabled that are not ready to go into the nursing homes and they can still live on their own.

Rob Gaudin: So number 1 should add lower income, disabled, and elderly.

Comment 25: Yes.

Rob Gaudin: Would that be a fair statement?

Comment 26: I would like to add to number 1. One of the things that we find is that there is a lot of elderly and now especially that baby boomers are going to get to a certain age that one of the couples if you will is taking care of the other couple. That is a big cost savings for the United States. It saves a lot of nursing home placement. I think we have to find a better way to get supports to those families so that they can continue to be the caregiver and not get so exhausted. I think there should be some dialog in making special units. I think this is so effective when the units and the staffing supports come together so that you can maximize and have one staff person take care of 16 couples perhaps that have certain needs and we are not bring it on the QSP. Several QSP and all of those QSP workers are all in different apartments. Maybe you could have one QSP serving the whole unit. I think there really should be a lot of wisdom and a lot of attention to that. In fact I just talked to one person and he has been taking care of his wife for maybe five years. He is exhausted and he is getting older. He was asking and he said that I am going to have to go the nursing home and spend all of my resources or a good share of my resources when in fact I can take care of my wife and continue, but I need a little relief. I need some help here. Part of that might be that this person is willing to relocate and get that help, but needs to have the unit to be able to support that. So I think it is really an investment in our future to really consider a different way to accomplish that. A lot of times that we out into what those units should look like and have all of those supports in line. I think we maximize our resources that way. I personally think that that is a lot different than 2 or 3, because number 2 or 3 you are looking at pretty abled body people, but number 1 you are talking about disabled and now you have to put some real though into it and how you are going to deliver it.

Comment 27: I will agree with everybody else. I am in Region 7 and we have been doing number 1, multi-family rehab. We have had two of those a year for the past five years and it is making a difference.

Rob Gaudin: Any changes to 2 or 3 then?

Comment 28: I have a question regarding impacts. I am with the homebuilders association. Just from personal experience with rental properties as well. One thing that is really interesting is your ability to really make some serious change in affordability actions across the communities in North

Dakota, I think it rests in the hands of smaller investors and business owners. When you take a look at just small business in general and the impact that small business owners have on the actual economy, it is incredible. You look at the composition of local Chambers of Commerce it is 80 percent small business owner's not large companies. When it comes to having an impact on housing I really think that the way things are set up and the way that you access resources and funding and supports for some of this HUD programs and NDHA programs, you have to be a large business to navigate the network of how those funding opportunities exist. If you want to make waves in improving housing for people across the community reach out to the smaller investors with a handful of properties and help them to figure out how to maintain their costs and access programs to keep their rents low. They hold a lot of properties throughout the community. You get turned off and completely frustrated to be honest when you want to help and there are a lot of people who want to help, but you don't even know where to begin to turn or how big of scissors you need to cut the red tape. If you can find a way to condense this down and make it an option for people who have smaller investments, but there are plenty of them you could have impacts on affordability and I think there are a lot of people who have a handful of properties that are willing to help, it is just that they don't know how to work these systems. So you are stuck with some of the larger developers doing it and they can only do a few projects at a time.

Comment 29: I think about number 2 and 3, one of the things that we were doing in Dickinson and one of the contemplation we were having was we were going to set up a temporary housing initiative. We wanted to have two case managements systems to be able to help with that. One case management system might be with people who are having difficulties integrating with their community. The other case management system we were most interested in was how do you get those people into jobs. If you look at 2 and 3 if there is any way to combine the low-income with some way to get into wage earning and have some flexibility with that. Again I relate to Dickinson, anybody who is working is already going to be out on their limits typically because the wages are so high they are going to raise out of this. So they can't work to have housing for low-income. If there is some flexibility that can be considered for 2 and 3 to say that we want to get people moved out of low-income, you have to figure out how you are going to create. So lots of times if you look at this in isolated, you can't do that. Number 1 is the retire population and disabled they are going to be a little different, but 2 and 3 there should be an integration on how do you get them into jobs and make that become more affordable. That is one of the things that we have talked about even to the point where you provide grants to the businesses to line it up. Like you get a grant if you hire some of these people and give them a stable life. Those are some things that we are getting creative around. That is Dickinson where there are a lot of jobs to be had, but the real flexibility in the housing arena. Those low-income people can't stay there indefinitely. So it is really a quandary. We have to figure out soon some way to make those work.

Rob Gaudin: Thank you.

(Presentation)

Rob Gaudin: Is this what we should still be doing? This is from the previous plan. These are the strategies that we had. Is there something about this that should be changing?

Comment 30: Number 2 should be number 1, number 3 should be 2 and number 1 should be number 3.

Rob Gaudin: I didn't mean the order.

Comment 31: Those are all important, but if that is a prioritized list.

Rob Gaudin: This is not a prioritized list.

Comment 32: Those are definitely what needs to happen. Rapid rehousing number 3.

Rob Gaudin: Other commentary.

Comment 33: Is HUD providing for this. Do they provide the building, the money to put the building up or the operating costs? Is that in this?

Rob Gaudin: So you are asking if HUD provides the operating costs or the capital costs.

Comment 34: Yes, which do they do both in this strategy? Sometimes we run into the paid operating, but no capital costs.

Rob Gaudin: The answer is yes and no. How is that for an answer. In some programs you get the operating expenses and in some program parts you only get the capital. I believe CDBG is the capital and the ESG is service.

Comment 35: You can do renovations within ESG, but we have never done renovation, because there is such a great need for operations and supportive services.

Comment 36: To go along with what he was saying with number 3 the financial support is very important like with rapid rehousing. It is really important to get that homeless person into an apartment or some sort of a shelter. Then once you have a roof over their head then you can start working on some of the other issues.

Rob Gaudin: HUD wants us to target these. They wish to deemphasize transitional and devote more resources if you will to rapid rehousing. Should I change the language to be current? That is what I am hearing a little bit in terms of number 3 is we should be a little bit specific in what we intend to do.

Comment 37: I think so. Rapid rehousing that is a term that we use that we have supportive services for veterans and families program where we work with homeless vets and rapid rehousing is the term that we use to get a vet into an apartment. It is something like that. Once you have that then you can start working on their issues on why they are homeless.

Comment 38: Does the rapid rehousing encapsulate the rental assistance and the utility assistance and all of the other parts that go with providing financial support for those intimate risks of homelessness?

Comment 39: Yes. Say that one more time.

Comment 40: The rapid rehousing which just looking at it literally would put somebody back in from a homeless situation into housing situation. Does that term also encapsulate rental assistance and utility assistance that is needed for those people who are at risk for homelessness?

Comment 41: Yes. I guess the way that we work with the vets right now is that they have to be homeless, but maybe also the risk of homelessness that would fit right into it. If you help them before they get to that point that would fit in there.

Comment 42: With the ESG there are two different categories. Homeless presentation which is the at-risk and then there is the rapid rehousing which they are literally homeless.

Rob Gaudin: So we should add one for homeless prevention.

Comment 43: Yes.

Comment 44: I don't know if this is the right place to add this but earlier you had mentioned the different programs that were funded in North Dakota. You had HOPWA was zero. That money doesn't come through the Department of Commerce or though the state. We do have a HOPWA program.

Rob Gaudin: The tristate, I am aware of that.

Comment 45: You know about that? I just had to mention that. We do have some services through that program, but it is tristate, Montana, North Dakota, and South Dakota. It has because of the department of Commerce that we were included in that tristate plan, but it is administered.

Rob Gaudin: It is not a part of this plan. It is part of the Montana plan.

(Presentation)

Comment 46: Number 2 I think if we are talking about infrastructure that is needed it is water, sewer, and roads.

Rob Gaudin: I assume that you also mean streets and sidewalks?

(Presentation)

Comment 47: I would like to make sure that we keep our potential barriers, are something that we have been working on for many many years and it continues to be something that needs to be done. I know you said water and sewer and I realize we also still to make sure that we have community building in our small small communities that do not have the ability to build these. That we have places to gather. One of my greatest concerns is if I am going to keep my elderly citizens out in these communities that they have a place to go for Meals on Wheels and some of this. So we are (inaudible) if they can only go into these handicapped accessible place to serve these meals I will lose so many of my points. So that is in our area, one of the things that we are taking a look at and saying we have a senior population and those of you that reason that a lot of my seniors are dying and they haven't told us. We need to make sure that we are addressing and make sure that we are meeting these needs so that we all don't have to leaves because we don't

have quality of life at all in our rural communities. So that we keep what we have and maintain our communities.

Comment 48: You guys don't have Meals on Wheels, where they bring food to the elderly (Inaudible).

Comment 49: For certain ones. (Inaudible) Even to have that community of working with a senior citizen center. They say well these people are not coming. We starts asking and talking about it and one is in a walker and one in this and then you start looking at the facility. Well if I can't go to the bathroom and eating and playing cards and whatever. It becomes those types of things that we don't even think about. We are getting closer to thinking about as we age into these realities. Those are some of the things that I feel we need to stay very adaptable in how and what we use this money for because if who would have thought ten years ago we would be sitting and talking about western North Dakota, change happens very quickly here. To make a five-year plan and limit it to what we can do and where are we going to spend this money we need to have that adaptability. This is one of the sources of funds through the Department of Commerce that allows us to meet our needs immediately as we have them.

Rob Gaudin: Your point is really well taken. The adaptability and the ability to change slightly how we are going to do that presents for us a little bit of a challenge. As the survey slides, HUDs choices for us are high need or not. Once we select high need we need to say how many people and how many dollars we are going to spend on that over five years, so that is a challenge where we have to make sure that we have a good inventory and keep our phrasing of our areas broad enough. So your point is really well taken.

Comment 50: I think in the past our money has always been split up by housing, public facilities, economic development. Public facilities was a catch all for non-housing. So it was rehab of senior centers. It was rehab of a community center in a community that was 51 percent LMI. Removal of architectural barrier was important, but if you only do that in the senior center and you don't have a public facility you can't do the furnace that is going to die any minute. You can only do the architectural barriers. So I think we do need to add something in there about public facilities.

Comment 51: You can't just do water and sewer.

Rob Gaudin: Actually I have it down here encourage communities to address local facilities and service needs.

Comment 52: For number 1, is the intent really to create jobs or to equip low and moderate income persons to acquire jobs?

Rob Gaudin: This is from the previous plan. I am not sure what the intent as.

Comment 53: Are you manipulating this for the current plan?

Rob Gaudin: No I am just getting you to talk about what we said last time.

Comment 54: The intent of this was to be able to fund anything we want.

Rob Gaudin: Right.

Comment 55: That was the intent because they let us.

Rob Gaudin: You are right, but they are not letting you so much this time.

(Presentation)

Comment 56: I think one of the good uses of CDBG money for economic development was also the installation of infrastructure for new business development. I want to make sure that that still remains an eligible activity. One thing that we really need to keep in mind in North Dakota is the continued diversification of our economy is vital. We are such quantity based economy with oil and agriculture this has to remain a category for us.

Rob Gaudin: I agree.

Comment 57: So your statement when you asked if that retraining somehow in here is very important. I think that the community that I just mentioned with these 35 people might just be different. I would like to do something different that rather have them move away. So that retraining would probably fit into here would be important.

Comment 58: There was a time when and probably real recently there was a dialog about buying rural development. I am trying to get my arms around the comparisons and so HUD is targeting more of the larger (Inaudible) and rural development is targeting the other sector. I am much more familiar with rural development because in Dickinson we were under 20 and now all of a sudden when that population Census changes I think we are going to be more into HUD or something or we will lose out on rural development. Is there and can you offer an explanation between the two and can you also talk about how many dollars are coming into the state through these various programs? Do you have that? From HUD what is the amount?

Ron Gaudin: Rural development I don't know. The slide at the beginning gave us roughly the seven million that we know is coming in 2015. Three million for HOME, 3.6 for CDBG and 450,000 for ESG.

Comment 59: No offense, but that is such a little amount. Federally is that there can be more impact with that? It is just so little.

Rob Gaudin: So I should write down here write letter to congressman.

Comment 60: I think I was telling her that I got an email from the senator's office that said and I am sure some of you have heard this. It was the first letter I have received and it was Dear Mary and that was kind of nice. I hope I am not saying anything out of turn, but I don't think so. It said Dear Mary, This is the first year that President Obama has delivered to the Senate or the legislative body a budget that is on time. Has anybody heard this? Anyway it is on time and so he said do you want to have some input from the ground on what the president's budget has included in it. I can go on it was click here and click there. So I suppose I suggest to all of you that maybe we should do have some input into the federal government's budget this year. He said that it is never on time and he wants a response from all of us on the ground by February. That actually they won't be making

decisions until October. I said I have never heard of this before. Nobody has ever said that we can have some impact on the president's budget. I didn't know that you could do that. I am just telling you now maybe we should get...

Rob Gaudin: Everybody get on line and allocate our resources here.

Comment 61: I think so and especially with our changing demographics. I say throw in the whole oil impact. So get online and if anyone wants that link I will ask if I can give it. I'll find out.

Rob Gaudin: I think we have talked about a few of these things. I want to encourage you if you have something you would like to say, please send it to Adele and we will talk about it.

(Presentation)

Comment 62: The four high priority items, there are four right? The four high priority items at this point. Are there just four high priority items?

Rob Gaudin: There are as many as you want. There can be four, but the minute you walk out the door there could be five or six. There are a number.

Comment 63: I was just wondering how four came about and why there are not five or six?

Rob Gaudin: There really aren't. This is just and if you are asking how did I come up with these for non-housing community development. It was the executive summary from the last plan. How did I come up with these for homeless, it was in the executive summary in the last plan and how did I came up with housing, this is what we said last time. We already have a fourth here in homeless. We probably have some revised things here. So it is not the number of the priorities it is more of the content. Have we captured everything you need?

Comment 64: We were told that only four received a high priority ranking, four categories.

Comment 65: When we do our PDS and we only have those four to pick from to allocate our funding.

Rob Gaudin: I think we are thinking of two different high priorities. I am thinking of what is high, medium, low and none and how the old system was. Now it is high or nothing at all for the new eCon Planning Suite. These strategies we need to have and it is not about preconceived notions. What I want to hear is what you think not within a box. Think outside the box. That is what I want to hear from you.

Comment 66: We were told here is the box.

Rob Gaudin: That is an Annual Action Plan thing. This is a five-year strategy. You have to think outside the box.

Comment 67: So they all could be high?

Rob Gaudin: Everything could be high. Everything we say that we are going to invest in in the plan we are going to say yes.

Comment 68: Remember if it is high it was funded, right?

Rob Gaudin: That is correct.

Comment 69: If you have a number attached to it to assist households you have to be able to do it. They are time balanced. You have to really.

Comment 70: I am still a little confused. How did you come up with the four high?

Comment 71: From the survey.

Comment 72: When we asked what made it high was there a threshold or the definition of what made it high. Am I missing?

Rob Gaudin: Correct. You are missing something. We are only ranking these things. This is high. This is also high. They are all high, but one has more votes than the other. High vote. That is all that we are talking about here on these survey slides. What we have to distill from that and what you say here and everything that you send to Adele and all of the data that came before that is when we write up the plan. I think some of you have been shared an image of the measurement criteria. It is a list of things like how many of this are you going to fund over the next five years and how many units are you going to have and how much money are you going to spend. The goal outcome. That is kind of what we have to fill out. My strategy and talking with the Department of Commerce is we don't really have any flexibility with this plan. So the old plan we already had no need, low, medium and high need we can insert tables in this document that correspond with medium and high. We don't have to make an administrative substantial change to the plan sometime a year or two down the road if we go from a medium to a high because it was already in the plan. It just wasn't in HUDs tailored system. So that is what I think we are trying to do. We have to make order of that so I am encouraging you, if you have commentary and it is not like I don't get the priority, well neither do we, but at the same time tell us what you think are the priorities in your community and we will work it out from there.

Comment 73: You are almost saying in order for us to take a look and try to see these in our communities that we almost need to have a five-year capital improvement or that type of thing and we should be having all of the applications come in now to say what it is that we are going to fund for the next five years so that we have a project like the Department of Transportation does. So that we have a project out here and the few already.

Rob Gaudin: I am not going to say that this is like the Department of Transportation.

Comment 74: Do we have to have everything out here and have all of these projects here and how do we put them into what we are going to do?

Rob Gaudin: What I think the objective indicators were kind of alerts to you to how we need to put this together. We are going to release a draft for public review prior to it going to HUD. So that is a month away and that is how that is coming and we are trying to narrow in on that now. So do the

best you can. Whatever that is, but I really want to hear what you intend to do. I am less concerned about the numbers. We have to put some kind of numbers, but what do you think of the priorities. We might not fund them this year or next year or the year after, but you expect it to be funded within the next five years. So what are the priorities in your town? In your region? What are those? That is what I want to hear from you. What are those priorities? It may be the only Region with that priority in the entire state, but it goes in with the state's proprieties, because it is one of the many. That is really what I want from you. Describe these things for us, I am taking a wild guess at what these are here. I am trying to get you, this is a focus group, I am trying to get you to talk about it. What is it? So that is what I am hoping that you can send Adele in a short letter. I was there and this is what I think. That would be great. Then we could sit down and go through these things. Well ok we don't know what this is going to cost. We don't have that kind of resources. Well we will put something in the document that we have there in place something so next year you can say that we didn't do that this year, but maybe the next year or the year after. So this is kind of a first time for all of us on this new planning system this online thing with HUD so there is a little bit of trepidation on many clients part on how this is going to work. We want to cover as many bases as possible.

Comment 75: We got these questions for our rep.

Comment 76: I think where you are sensing this confusion is you just called us a focus group and maybe a week or two ago we were all handed four categories that are now the only categories that you can fund. That got us all a little excited. Some of the things that we do are not part of that. So I was trying to figure out what is the definition of high.

Rob Gaudin: The best thing to do is tell us what your needs are. That is what this is all about. What are your needs? Now if you tell us what your needs are through some filter that system is going to fail. So just tell us what your needs are. The idea to see this image, this snippet from the screen about how we have to enter the data was just to show you what kind of constraints that we have to get this to HUD, but it is just trying to get us to talk on the same place about all of this stuff. Really if you can't describe your needs we will help you. If you can describe them and it is not through some filter then just tell us what they are and we will figure out the boxes that they go in and you get to look at it later before it goes to HUD. That is kind of where we are at.

Comment 77: Can I ask you, is part of this planning going to take a look at Vision West plan. All of those Region counties got together and designed some of their priorities through that Consortium. Is that going to be considered as part of this?

Comment 78: We are not going to take other priorities that other organizations have sent in and put it into this plan. When it is a priority and it becomes a high priority we have to do something.

Comment 79: Right, but I am talking about the input as far as what those Regions think are their priorities? Would that be a logical place in these counties have gone through and planned and said that housing and child care are their high priorities. So it would make sense to have that thought out maybe when you are using your five-year plan.

Rob Gaudin: Can they set that those geographic areas exclude the entitlement communities and incorporate that smaller communities, yes we can consider that. Remember it is not other state funding; it is federal funding that we are trying to attach to.

Comment 80: We already have public hearings.

Comment 81: Was there some concern about the level of attendance at some of those?

Comment 82: Some of them were small, but Dickinson was well attended. Dickinson was probably the best. I am getting lots of input there.

PUBLIC COMMENTS

APPENDIX E: GLOSSARY

Accessibility All new construction of covered multifamily buildings must include certain features of accessible and adaptable design. Units covered are all those in buildings with four or more units and one or more elevators, and all ground floor units in buildings without elevators.

Action Plan The Action Plan includes the following: An application for federal funds under HUD's formula grant programs (CDBG, ESG, HOME); Identification of federal and other resources expected to be used to address the priority needs and specific objectives in the strategic plan; Activities to be undertaken including the following; Activities to address Homeless and other special needs (persons with mental, physical or developmental disabilities, battered and abused spouses, victims of domestic violence, etc.); Activities to address other Actions (affordable housing, lead-based paint hazards, poverty reduction, public housing improvements, etc); and lastly; A description of the areas targeted given the rationale for the priorities for allocating investment geographically.

Affordable Housing That housing within the community which is decent and safe, either newly constructed or rehabilitated, that is occupied by and affordable to households whose income is very low, low, or moderate. Such housing may be ownership or rental, single family or multi-family, short-term or permanent. Achieving affordable housing often requires financial assistance from various public and private sources and agencies.

Agency Any department, agency, commission, authority, administration, board, or other independent establishment in the executive branch of the government, including any corporation wholly or partly owned by the United States that is an independent instrumentality of the United States, not including the municipal government of the District of Columbia.

Brownsfield Economic Development Initiative (BEDI) Grant Program BEDI is designed to help cities redevelop abandoned, idled, or underutilized industrial and commercial properties and facilities where expansion or redevelopment is complicated by real or perceived environmental contamination e.g., brownfields. BEDI accomplishes this by providing funding to local governments to be used in conjunction with Section 108 loan guarantees to finance redevelopment of brownfields sites. BEDI-funded projects must meet one of the CDBG program's national objectives.

Certification A written assertion based on supporting evidence that must be kept available for inspection by HUD, by the Inspector General of HUD, and by the public. The assertion shall be deemed to be accurate unless HUD determines otherwise, after inspecting the evidence and providing due notice and opportunity for comment.

Community Development Block Grant Program (CDBG) A Community Development Block Grant is a federal grant to states, counties or cities. It is used for housing and community development including housing construction and rehabilitation, economic development, and public services which benefit low- and moderate- income people. Grant funds can also be used to fund activities which eliminate slums and blight or meet urgent needs. CDBG-R refers funds granted through the American Recovery and Reinvestment Act of 2009.

Community and Housing Development Organization (CHDO) A federally defined type of nonprofit housing provider that must receive a minimum of 15 percent of all Federal HOME Investment Partnership funds. The primary difference between CHDO and other nonprofits is the level of low-income residents' participation on the Board of Directors.

Comprehensive Grant Program (CGP) HUD grant program via an annual formula to large public housing authorities to modernize public housing units.

Consolidated Annual Performance and Evaluation Performance Report (CAPER) The CAPER allows HUD, local officials, and the public to evaluate the grantees' overall performance, including whether activities and strategies undertaken during the preceding year actually made an impact on the goals and needs identified in the Consolidated Plan.

Consolidated Plan The Consolidated Plan services four separate, but integrated functions. The Consolidated Plan is: a planning document for the jurisdiction which builds on a participatory process with County residents; an application for federal funds under HUD's formula grant programs which are: CDBG, HOME, ESG, HOPWA; a three-year strategy to be followed in carrying out HUD programs; and lastly, an action plan describing individuals activities to be implemented.

Cost Burden The extent to which gross housing costs, including utility costs, exceeds 30 percent of gross income, based on data available from the U.S. Census Bureau.

Economic Development Initiative (EDI) Grant Program EDI is designed to enable local governments to enhance both the security of loans guaranteed through HUD's Section 108 Loan Guarantee Program and the feasibility of the economic development and revitalization projects that Section 108 guarantees finance. EDI accomplishes this by providing grants to local governments to be used in conjunction with Section 108 loan guarantees. A locality may use the grant to provide additional security for the loan (for example, as a loss reserve), thereby reducing the exposure of its CDBG funds (which by law must be pledged as security for the loan guarantees). A locality may also use the EDI grant to pay for costs associated with the project, thereby enhancing the feasibility of the 108-assisted portion of the project. EDI-funded projects must meet one of the CDBG program's national objectives.

Elderly: The CDBG low- and moderate-income limited clientele national objective at 570.208(a)(2)(i)(A) includes the elderly as a presumptive group. However, the CDBG regulations do not define the term "elderly". Therefore, a grantee can use its own definition of elderly for non-housing activities. As such, the County defines elderly as 55 years of age or older. With regard to housing activities, the Consolidated Plan requires identification of housing needs for various groups, including the elderly, which is defined as 62 years of age or older at 24 CFR 91.5 and 24 CFR 5.100. Because of this, housing activities to be counted toward meeting a Consolidated Plan goal of housing for the elderly must use the definition in 24 CFR 5.100, 62 years or older.

Emergency Solutions Grant (ESG) Formerly the Emergency Shelter Grant Program, the ESG is a federally funded program designed to help, improve and maintain the quality of existing emergency shelters for the homeless. ESG helps emergency shelters meet the costs of operating emergency shelters and of providing certain essential social services to homeless individuals so that these persons have access to a safe and sanitary shelter, and to the supportive services and other kinds of assistance they need to improve their situations. The program is also intended to prevent the increase of homelessness through the funding of preventive programs and activities.

Emergency Shelter Any facility with overnight sleeping accommodations, the primary purpose of which is to provide temporary shelter for the homeless in general or for specific populations of the homeless.

Entitlement An underlying formula governing the allocation of Block Grant funds to eligible recipients. Entitlement grants are provided to larger urban cities (i.e. population greater than 50,000) and larger urban counties (greater than 200,000).

Federal National Mortgage Association (Fannie Mae) A federally chartered, stockholder owned corporation which supports the secondary market for both conventional mortgages and mortgages insured by the FHA and guaranteed by VA.

Financing Functions necessary to provide the financial resources to fund government operations and federal assistance including the functions of taxation, fee and revenue generation, public debt, deposit funds, and intra governmental collections.

First-time Homebuyer An individual or family who has not owned a home during the three-year period preceding the assisted purchase of a home that must be occupied as the principal residence of the homebuyer. Any individual who is a displaced homemaker or a single parent may not be excluded from consideration as a first-time homebuyer on the basis that the individual, while a homemaker or married, owned a home with his or her spouse or resided in a home owned by the spouse.

Fiscal Year Any yearly accounting period, regardless of its relationship to a calendar year.

Full Time Equivalent (FTE) One FTE is 2,080 hours of paid employment. The number of FTEs is derived by summing the total number of hours (for which included categories of employees) are paid by the appropriate categories of employees and dividing by 2,080 hours (one work-year). Appropriate categories include, but are not limited to, overtime hours, hours for full-time permanent employees, temporary employees, and intermittent employees who may not have been paid for an entire reporting period.

Grant A federal grant may be defined as a form of assistance authorized by statute in which a federal agency (grantor) transfers something of value to a party (the grantee) usually, but not always, outside the federal government, for a purpose, undertaking, or activity of the grantee which the government has chosen to assist, to be carried out without substantial involvement on the part of the federal government. The "thing of value" is usually money, but may, depending on the program legislation, also includes property or services. The grantee, again depending on the program legislation, may be a state or local government, a nonprofit organization, or a private individual or business entity.

HOME The Home Investment Partnership Program, which is authorized by Title II of the National Affordable Housing Act. This federally funded program is designed to expand the housing, for very low-income people. And, to make new construction, rehabilitation, substantial rehabilitation, and acquisition of such housing feasible, through partnerships among the federal government, states and units of general local government, private industry, and nonprofit organizations able to utilize effectively all available resources.

HOME Funds Funds made available under the HOME Program through allocations and reallocations, plus all repayments and interest or other return on the investment of these funds.

Homeless According to the HEARTH Act of 2009, the term "homeless", "homeless individual", and "homeless person" means:
(1) an individual or family who lacks a fixed, regular, and adequate nighttime residence;
(2) an individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
(3) an individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including hotels and motels paid for by Federal, State, or local government programs for low-income individuals or by charitable organizations, congregate shelters, and transitional housing);
(4) an individual who resided in a shelter or place not meant for human habitation and who is exiting an institution where he or she temporarily resided;
(5) an individual or family who—

(A) will imminently lose their housing, including housing they own, rent, or live in without paying rent, are sharing with others, and rooms in hotels or motels not paid for by Federal, State, or local government programs for low-income individuals or by charitable organizations, as evidenced by—

(i) a court order resulting from an eviction action that notifies the individual or family that they must leave within 14 days;

(ii) the individual or family having a primary nighttime residence that is a room in a hotel or motel and where they lack the resources necessary to reside there for more than 14 days; or

(iii) credible evidence indicating that the owner or renter of the housing will not allow the individual or family to stay for more than 14 days, and any oral statement from an individual or family seeking homeless assistance that is found to be credible shall be considered credible evidence for purposes of this clause;

(B) has no subsequent residence identified; and

(C) lacks the resources or support networks needed to obtain other permanent housing; and

(6) unaccompanied youth and homeless families with children and youth defined as homeless under other Federal statutes who--

(A) have experienced a long term period without living independently in permanent housing,

(B) have experienced persistent instability as measured by frequent moves over such period, and

(C) can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse, the presence of a child or youth with a disability, or multiple barriers to employment.

Homeless Family Family that includes at least one parent or guardian and one child under the age of 18, a homeless pregnant woman, or a homeless person in the process of securing legal custody of a person under the age of 18.

Homeless Subpopulation Include but are not limited to the following categories of homeless persons: severely mentally ill only, alcohol/drug addicted only, severely mentally ill and alcohol/drug addicted, fleeing domestic violence, youth and persons with HIV/AIDS.

HOPWA Housing Opportunities for People With AIDS is a federal program designed to provide States and localities with resources and incentives to devise long-term comprehensive strategies for meeting the housing needs of persons with acquired immunodeficiency syndrome (AIDS) or related diseases and their families. The program authorizes entitlement grants and competitively awarded grants for housing assistance and services.

Household Household means all the persons who occupy a housing unit. The occupants may be single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

HUD Created as part of President Lyndon B. Johnson's War on Poverty, the Department of Housing and Urban Development (HUD) was established as a Cabinet Department by the Department of Housing and Urban Development Act (42 U.S.C. 3532-3537), effective November 9, 1965. It consolidated a number of other older federal agencies. The Department of Housing and Urban Development is the Federal agency responsible for national policy and programs that: address America's housing needs; improve and develop the Nation's communities; and enforce fair housing laws. HUD's mission is helping create a decent home and suitable living environment for all Americans. It has given America's cities a strong national voice at the Cabinet level.

HUD Income Levels Income levels serve as eligibility criteria for households participating in federally funded programs.

Extremely Low-income Family whose income is between 0 and 30 percent of the median income for the area, as determined by HUD with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 30 percent of the median for the area on the basis of HUD's findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

Low-income Low-income families whose income does not exceed 50 percent of the median income for the area, as determined by HUD with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 50 percent of the median for the area on the basis of HUD's findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

Middle Income Family whose income is between 80 percent and 95 percent of the median area income for the area, as determined by HUD, with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 95 percent of the median for the area on the basis of HUD's findings that such variations are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

Moderate-income Family whose income does not exceed 80 percent of the median income for the area, as determined by HUD, with adjustments for smaller and larger families, except that HUD may establish income ceilings higher or lower than 80 percent of the median for the area on the basis of HUD's findings that such variations

are necessary because of prevailing levels of construction costs or fair market rents, or unusually high or low family incomes.

Jurisdiction A State or unit of general local government.

Large Family Family of five or more persons.

Lead-based paint hazards Any condition that causes exposure to lead from lead-contaminated dust, lead-contaminated soil, lead-contaminated pain that is deteriorated or present in accessible surfaces, friction surfaces, or impact surfaces that would result in adverse human health effects as established by the appropriate Federal agency.

Letter of Credit Line of credit to a grant recipient established at a time of approval of application.

Liability Assets owed for items received, services received, assets acquired, construction performed (regardless of whether invoices have been received), an amount received but not yet earned, or other expenses incurred.

Neighborhood Stabilization Program (NSP) Created to aid communities affected by foreclosure and abandonment through purchase and redevelopment. NSP1 refers to grants to state and local governments given on a formula basis and authorized under Division B, Title III of the Housing and Economic Recovery Act of 2008. NSP2 refers to funds allocated to states, local governments, nonprofits and consortiums on a competitive basis through funds authorized from the American Recovery and Reinvestment Act of 2009.

Overcrowded For purposes of describing relative housing needs, a housing unit containing more than one person per room, as defined by U.S. Census Bureau, for which the Census Bureau makes data available.

Person with a Disability A person who is determined to:

1) Have a physical, mental or emotional impairment that:
   i) Is expected to be of long-continued and indefinite duration;
   ii) Substantially impedes his or her ability to live independently; and
   iii) Is of such a nature that the ability could be improved by more suitable housing conditions;

   Or
2) Have a developmental disability, as defined in section 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act (42 U.S.C. 6001-6007); or
3) Be the surviving member or members of any family that had been living in an assisted unit with the deceased member of the family who had a disability at the time of his or her death.

Private Non-profit Organization A secular or religious organization described in section 501 (c) of the Internal Revenue Code of 1988 which: (a) is exempt from taxation under subtitle A of the Code; (b) has an accounting system and a voluntary board; and (c) practices nondiscrimination in the provision of assistance.

Program An organized set of activities directed toward a common purpose or goal that an agency undertakes or proposes to carry out its responsibilities.

Program Income Program income is the gross income received by the recipient and its subrecipients* directly generated from the use of CDBG funds. For those program income-generating activities that are only partially assisted with CDBG funds, such income is prorated to reflect percentage of CDBG funds that were used. Reference 24 CFR 570.500(a).

Examples: (Note: This list in NOT exclusive and therefore other types of funds may also constitute CDBG program income.)

- proceeds from the disposition by sale or long-term lease (15 years or more) of real property purchased or improved with CDBG funds.
- proceeds from the disposition of equipment bought with CDBG funds.
- gross income from the use or rental of real property that has been constructed or improved with CDBG funds and that is owned (in whole or in part) by the recipient or subrecipient. Costs incidental to the generation of the income are deducted from the gross income.
- payments of principal and interest on loans made using CDBG funds.
- proceeds from the sale of loans made with CDBG funds.
- proceeds from the sale of obligations secured by loans made with CDBG funds.
- any interest earned on funds held in a revolving fund account.
- any interest earned on program income pending its disposition.
- funds collected through special assessments that are made against properties owned and occupied by non-low and moderate- income households where the assessments have been made to recover some or all of the CDBG portion of a public improvement.

Reference: 570.500(a)(1)

Program income does not include the following examples:

- interest earned on grant advances from the U.S. Treasury. Any interest earned on grant advances is required to be returned to the U.S. Treasury.
- proceeds from fund-raising activities carried out by subrecipients that are receiving CDBG assistance to implement eligible activities.
- funds collected through special assessments that have been made to recover the non-CDBG portion of a public improvement.
- proceeds from the disposition by the grantee of real property that has been acquired or improved with CDBG funds when the disposition occurs after grant closeout for entitlement grantees.

- proceeds from the disposition of real property that has been acquired or improved with CDBG funds where the disposition occurs within a five year period (or more if so determined by the grantee) after the expiration of the agreement between the grantee and subrecipient for that specific agreement where the CDBG funds were provided for the acquisition or improvement of the subject property.

Note: This list is not all-inclusive.

*****Subrecipient*** *means a public or private nonprofit agency, authority, or organization or an authorized for-profit entity receiving CDBG funds from the recipient or another subrecipient to undertake activities eligible for such assistance. The term excludes an entity receiving CDBG funds from the recipient unless the grantee explicitly designates it as a subrecipient. The term includes a public agency designated by a unit of general local government to receive a loan guarantee, but does not include contractors providing supplies, equipment, construction, or services subject to the procurement requirements as applicable***.**

Project A planned undertaking of something to be accomplished, produced, or constructed, having a finite beginning and finite end. Examples are a construction project or a research and development project.

Rehabilitation Labor, materials, tools, and other costs of improving buildings, including repair directed toward an accumulation of deferred maintenance; replacement of principal fixtures and components of existing buildings; installation of security devices; and improvement through alterations or incidental additions to, or enhancement of, existing buildings, including improvements to increase the efficient use of energy in buildings, and structural changes necessary to make the structure accessible for persons with physical handicaps.

Rehabilitation also includes the conversion of a building to an emergency shelter for the homeless, where the cost of conversion and any rehabilitation costs do not exceed 75 percent of the value of the building before conversion. Rehabilitation must meet local government safety and sanitation standards.
For projects of 15 or more units where rehabilitation costs are 75 percent or more of the replacement cost of the building, that project must meet the accessibility requirement of Section 504 of the Rehabilitation Act of 1973; or where rehabilitation costs are less than 75 percent of the replacement cost of the building, that project must meet the requirements of 24 CFR 8.23b.

Rental Assistance Rental assistance payments provided as either project-based rental assistance or tenant-based rental assistance. Otherwise known as the Section 8 Rental Assistance Payments Program and variations thereof.

Renovation Rehabilitation that involves costs of 75 percent or less of the value of the building before rehabilitation.

Request for Proposals (RFP) A RFP is the instrument used to solicit proposals/offers for proposed contracts using the negotiated procurement method.

Section 108 Loan Guarantee Program The Section 108 Loan Guarantee Program involves a federal guarantee on local debt allowed under Section 108 of the Housing and Community Development Act of 1974, as amended. This section of the Act allows public entities to issue promissory notes through HUD to raise money for eligible large-scale community and economic development activities. HUD guarantees these notes, which are sold on the private market in return for a grantee's pledge of its future CDBG funds and other security for the purpose of debt repayment. Section 108 activities must satisfy CDBG eligibility and national objective criteria as well as Section 108 regulations and guidelines.

Senior A person who is at least 55 years of age. For senior housing activities, a senior is a person who is at least 62 years of age. (Seniors and "elderly" are terms that are often interchangeable.)

Shelter Plus Care A federally funded McKinney Act Program designed to provide affordable housing opportunities to individuals with mental and/or physical disabilities.

SRO (Single Room Occupancy) A unit for occupancy by one person, which need not but may contain food preparation or sanitary facilities, or both.

State Any State of the United States and the Commonwealth of Puerto Rico.

Subsidy Generally, a payment or benefit made where the benefit exceeds the cost to the beneficiary.

Substantial Rehabilitation Rehabilitation of residential property at an average cost for the project in excess of $25,000 per dwelling unit.

Supportive Housing Services provided to residents of supportive housing for the purpose of facilitating the independence of residents. Some examples are case management, medical or psychological counseling and supervision, childcare, transportation, and job training.

Supportive Housing Program (SHP) The Supportive Housing Program promotes the development of supportive housing and supportive services, including innovative approaches that assist homeless persons in the transition from homelessness and enable them to live as independently as possible. SHP funds may be used to provide transitional housing, permanent housing for persons with disabilities, innovative supportive housing, supportive services, or safe havens for the homeless.

Transitional Housing Is designed to provide housing and appropriate supportive services to persons, including (but not limited to) deinstitutionalized individuals with disabilities, homeless individuals with disabilities, and homeless families with children. Also, it is housing with a purpose of facilitating the movement of individuals and families to independent living within a time period that is set by the County or project owner before occupancy.

OMB Number: 4040-0004
Expiration Date: 8/31/2016

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [x] New
- [ ] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: State of North Dakota

* b. Employer/Taxpayer Identification Number (EIN/TIN): 45-0309764

* c. Organizational DUNS: 8027418430000

d. Address:

* Street1: 1600 East Century Avenue, Suite 2
Street2: PO Box 2057
* City: Bismarck
County/Parish: Burleigh
* State: ND: North Dakota
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 58502-2057

e. Organizational Unit:

Department Name: Department of Commerce

Division Name: Division of Community Service

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Ms.
* First Name: Adele
Middle Name:
* Last Name: Sigl
Suffix:

Title: Program Administrator

Organizational Affiliation:

* Telephone Number: 701-328-2618
Fax Number: 701-328-5320

* Email: asigl@nd.gov

OMB Number: 4040-0004
Expiration Date: 8/31/2016

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

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- [ ] Revision

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* Other (Specify):

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State Use Only:

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Province:
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Department Name: Department of Commerce

Division Name: Division of Community Service

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Prefix: Ms.
* First Name: Adele
Middle Name:
* Last Name: Sigl
Suffix:

Title: Program Administrator

Organizational Affiliation:

* Telephone Number: 701-328-2618
Fax Number: 701-328-5320

* Email: asigl@nd.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of HUD

11. Catalog of Federal Domestic Assistance Number:

14-231

CFDA Title:

Emergency Solutions Grants

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: ND-AL

* b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 07/01/2015

* b. End Date: 06/30/2016

18. Estimated Funding ($):

* a. Federal	445,841.00
* b. Applicant	0.00
* c. State	120,000.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	565,841.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on

☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☐ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Ms. * First Name: Bonnie

Middle Name:

* Last Name: Malo

Suffix:

* Title: Director

* Telephone Number: 701-328-2476 Fax Number: 701-328-5320

* Email: bmalo@nd.gov

* Signature of Authorized Representative: Bonnie Malo

* Date Signed: 5/11/2015

OMB Number: 4040-0004
Expiration Date: 8/31/2016

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [x] New
- [ ] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

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8. APPLICANT INFORMATION:

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* b. Employer/Taxpayer Identification Number (EIN/TIN): 45-0309764

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Street2: PO Box 2057
* City: Bismarck
County/Parish: Burleigh
* State: ND: North Dakota
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 58502-2057

e. Organizational Unit:

Department Name: Department of Commerce

Division Name: Division of Community Service

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Ms.
* First Name: Sherry
Middle Name:
* Last Name: Leno
Suffix:

Title: Program Manager

Organizational Affiliation:

* Telephone Number: 701-328-2468
Fax Number: 701-328-5320

* Email: shleno@nd.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of HUD

11. Catalog of Federal Domestic Assistance Number:

14-239

CFDA Title:

HOME Program

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: ND-AL
* b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 07/01/2015
* b. End Date: 06/30/2016

18. Estimated Funding ($):

* a. Federal	3,002,167.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	11,476.00
* g. TOTAL	3,013,643.00

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- [x] b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- [ ] c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- [ ] Yes
- [x] No

If "Yes", provide explanation and attach

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21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

- [x] ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Ms. * First Name: Bonnie

Middle Name:

* Last Name: Malo

Suffix:

* Title: Director

* Telephone Number: 701-328-2476 Fax Number: 701-328-5320

* Email: bmalo@nd.gov

* Signature of Authorized Representative: Bonnie Malo * Date Signed: 5/11/2015

OMB Number: 4040-0004
Expiration Date: 8/31/2016

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [x] New
- [ ] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

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Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 58502-2057

e. Organizational Unit:

Department Name: Department of Commerce

Division Name: Division of Community Service

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Ms.
* First Name: Sherry
Middle Name:
* Last Name: Leno
Suffix:

Title: Program Manager

Organizational Affiliation:

* Telephone Number: 701-328-2468
Fax Number: 701-328-5320

* Email: shleno@nd.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of HUD

11. Catalog of Federal Domestic Assistance Number:

14-228

CFDA Title:

Community Development Block Grant

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: ND-AL
* b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 07/01/2015
* b. End Date: 06/30/2016

18. Estimated Funding ($):

* a. Federal	3,609,246.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	1,700,000.00
* g. TOTAL	5,309,246.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- [ ] a. This application was made available to the State under the Executive Order 12372 Process for review on
- [x] b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- [ ] c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

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- [x] No

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21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

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Authorized Representative:

Prefix: Ms.
* First Name: Bonnie
Middle Name:
* Last Name: Malo
Suffix:

* Title: Director

* Telephone Number: 701-328-2476
Fax Number: 701-328-5320

* Email: bmalo@nd.gov

* Signature of Authorized Representative: Bonnie Malo
* Date Signed: 5/11/2015

STATE CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the State certifies that:

Affirmatively Further Fair Housing -- The State will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the state, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Anti-Lobbying -- To the best of the State's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraphs 1 and 2 of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts

under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of State -- The submission of the consolidated plan is authorized under State law and the State possesses the legal authority to carry out the programs under the consolidated plan for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Bonnie Malo
Signature/Authorized Official

5/11/2015
Date

Director
Title

Specific CDBG Certifications

The State certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR §91.115 and each unit of general local government that receives assistance from the State is or will be following a detailed citizen participation plan that satisfies the requirements of 24 CFR §570.486.

Consultation with Local Governments -- It has or will comply with the following:

1. It has consulted with affected units of local government in the nonentitlement area of the State in determining the method of distribution of funding;

2. It engages in or will engage in planning for community development activities;

3. It provides or will provide technical assistance to units of local government in connection with community development programs; and

4. It will not refuse to distribute funds to any unit of general local government on the basis of the particular eligible activity selected by the unit of general local government to meet its community development needs, except that a State is not prevented from establishing priorities in distributing funding on the basis of the activities selected.

Local Needs Identification -- It will require each unit of general local government to be funded to identify its community development and housing needs, including the needs of low-income and moderate-income families, and the activities to be undertaken to meet these needs.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objectives of Title I of the Housing and Community Development Act of 1974, as amended. (See 24 CFR 570.2 and 24 CFR part 570)

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);

2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2013, 2014, and 2015. (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;

3. Special Assessments. The state will require units of general local government that receive CDBG funds to certify to the following:

   It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

   However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

   It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It will require units of general local government that receive CDBG funds to certify that they have adopted and are enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Compliance with Laws -- It will comply with applicable laws.

Bonnie Malo
Signature/Authorized Official

5/11/2015
Date

Director
Title

OPTIONAL CERTIFICATION
CDBG

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

Bonnie Malo
Signature/Authorized Official

Director
Title

5/11/2015
Date

Specific HOME Certifications

The State certifies that:

Tenant Based Rental Assistance -- If it intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the State's consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through §92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Appropriate Financial Assistance -- Before committing any funds to a project, the State or its recipients will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

Bonnie Malo
Signature/Authorized Official

5/11/2015
Date

Director
Title

ESG Certifications

Each State that seeks funding under the Emergency Solutions Grants Program must provide the following certifications:

Matching Funds – The State will obtain any matching amounts required under 24 CFR 576.201 in a manner so that its subrecipients that are least capable of providing matching amounts receive the benefit of the exception under 24 CFR 576.201(a)(2).

Discharge Policy – The State will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Confidentiality – The State will develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

The State will ensure that its subrecipients comply with the following criteria:

Major rehabilitation/conversion – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – If ESG funds are used for shelter operations or essential services related to street outreach or emergency shelter, the subrecipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the applicant serves the same type of persons (e.g., families with children, unaccompanied youth, veterans, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The subrecipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

Homeless Persons Involvement – To the maximum extent practicable, the subrecipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted ESG.

Consolidated Plan – All activities the subrecipient undertakes with assistance under ESG are consistent with the State's current HUD-approved consolidated plan.

Bonnie Malo
Signature/Authorized Official

5/11/2015
Date

Director
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING REQUIREMENTS:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of HUD

11. Catalog of Federal Domestic Assistance Number:

14-231

CFDA Title:

Emergency Solutions Grants

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: ND-AL

* b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 07/01/2015

* b. End Date: 06/30/2016

18. Estimated Funding ($):

* a. Federal	445,841.00
* b. Applicant	0.00
* c. State	120,000.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	565,841.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on

☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☐ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Ms. * First Name: Bonnie

Middle Name:

* Last Name: Malo

Suffix:

* Title: Director

* Telephone Number: 701-328-2476 Fax Number: 701-328-5320

* Email: bmalo@nd.gov

* Signature of Authorized Representative: Bonnie Malo

* Date Signed: 5/11/2015

OMB Number: 4040-0004
Expiration Date: 8/31/2016

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [x] New
- [ ] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: State of North Dakota

* b. Employer/Taxpayer Identification Number (EIN/TIN): 45-0309764

* c. Organizational DUNS: 8027418430000

d. Address:

* Street1: 1600 East Century Avenue, Suite 2
Street2: PO Box 2057
* City: Bismarck
County/Parish: Burleigh
* State: ND: North Dakota
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 58502-2057

e. Organizational Unit:

Department Name: Department of Commerce

Division Name: Division of Community Service

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Ms.
* First Name: Sherry
Middle Name:
* Last Name: Leno
Suffix:

Title: Program Manager

Organizational Affiliation:

* Telephone Number: 701-328-2468
Fax Number: 701-328-5320

* Email: shleno@nd.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of HUD

11. Catalog of Federal Domestic Assistance Number:

14-239

CFDA Title:

HOME Program

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: ND-AL
* b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 07/01/2015
* b. End Date: 06/30/2016

18. Estimated Funding ($):

* a. Federal	3,002,167.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	11,476.00
* g. TOTAL	3,013,643.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- [ ] a. This application was made available to the State under the Executive Order 12372 Process for review on
- [x] b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- [ ] c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- [ ] Yes
- [x] No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

- [x] ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Ms. * First Name: Bonnie

Middle Name:

* Last Name: Malo

Suffix:

* Title: Director

* Telephone Number: 701-328-2476 Fax Number: 701-328-5320

* Email: bmalo@nd.gov

* Signature of Authorized Representative: Bonnie Malo * Date Signed: 5/11/2015

OMB Number: 4040-0004
Expiration Date: 8/31/2016

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [x] New
- [ ] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: State of North Dakota

* b. Employer/Taxpayer Identification Number (EIN/TIN): 45-0309764

* c. Organizational DUNS: 8027418430000

d. Address:

* Street1: 1600 East Century Avenue, Suite 2
Street2: PO Box 2057
* City: Bismarck
County/Parish: Burleigh
* State: ND: North Dakota
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 58502-2057

e. Organizational Unit:

Department Name: Department of Commerce

Division Name: Division of Community Service

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Ms.
* First Name: Sherry
Middle Name:
* Last Name: Leno
Suffix:

Title: Program Manager

Organizational Affiliation:

* Telephone Number: 701-328-2468
Fax Number: 701-328-5320

* Email: shleno@nd.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of HUD

11. Catalog of Federal Domestic Assistance Number:

14-228

CFDA Title:

Community Development Block Grant

*** 12. Funding Opportunity Number:**

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: ND-AL
* b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 07/01/2015
* b. End Date: 06/30/2016

18. Estimated Funding ($):

* a. Federal	3,609,246.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	1,700,000.00
* g. TOTAL	5,309,246.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- [ ] a. This application was made available to the State under the Executive Order 12372 Process for review on
- [x] b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- [ ] c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

- [ ] Yes
- [x] No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

- [x] ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Ms.
* First Name: Bonnie
Middle Name:
* Last Name: Malo
Suffix:

* Title: Director

* Telephone Number: 701-328-2476
Fax Number: 701-328-5320

* Email: bmalo@nd.gov

* Signature of Authorized Representative: Bonnie Malo
* Date Signed: 5/11/2015

STATE CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the State certifies that:

Affirmatively Further Fair Housing -- The State will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the state, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Anti-Lobbying -- To the best of the State's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraphs 1 and 2 of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts

under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of State -- The submission of the consolidated plan is authorized under State law and the State possesses the legal authority to carry out the programs under the consolidated plan for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Bonnie Malo
Signature/Authorized Official

5/11/2015
Date

Director
Title

Specific CDBG Certifications

The State certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR §91.115 and each unit of general local government that receives assistance from the State is or will be following a detailed citizen participation plan that satisfies the requirements of 24 CFR §570.486.

Consultation with Local Governments -- It has or will comply with the following:

1. It has consulted with affected units of local government in the nonentitlement area of the State in determining the method of distribution of funding;

2. It engages in or will engage in planning for community development activities;

3. It provides or will provide technical assistance to units of local government in connection with community development programs; and

4. It will not refuse to distribute funds to any unit of general local government on the basis of the particular eligible activity selected by the unit of general local government to meet its community development needs, except that a State is not prevented from establishing priorities in distributing funding on the basis of the activities selected.

Local Needs Identification -- It will require each unit of general local government to be funded to identify its community development and housing needs, including the needs of low-income and moderate-income families, and the activities to be undertaken to meet these needs.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objectives of Title I of the Housing and Community Development Act of 1974, as amended. (See 24 CFR 570.2 and 24 CFR part 570)

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);

2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2013, 2014, and 2015. (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;

3. Special Assessments. The state will require units of general local government that receive CDBG funds to certify to the following:

   It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

   However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

   It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It will require units of general local government that receive CDBG funds to certify that they have adopted and are enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Compliance with Laws -- It will comply with applicable laws.

Bonnie Malo
Signature/Authorized Official

5/11/2015
Date

Director
Title

OPTIONAL CERTIFICATION
CDBG

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

Bonnie Malo
Signature/Authorized Official

Director
Title

5/11/2015
Date

Specific HOME Certifications

The State certifies that:

Tenant Based Rental Assistance -- If it intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the State's consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through §92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Appropriate Financial Assistance -- Before committing any funds to a project, the State or its recipients will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

Bonnie Malo
Signature/Authorized Official

5/11/2015
Date

Director
Title

ESG Certifications

Each State that seeks funding under the Emergency Solutions Grants Program must provide the following certifications:

Matching Funds – The State will obtain any matching amounts required under 24 CFR 576.201 in a manner so that its subrecipients that are least capable of providing matching amounts receive the benefit of the exception under 24 CFR 576.201(a)(2).

Discharge Policy – The State will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Confidentiality – The State will develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

The State will ensure that its subrecipients comply with the following criteria:

Major rehabilitation/conversion – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the building will be maintained as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the building will be maintained as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – If ESG funds are used for shelter operations or essential services related to street outreach or emergency shelter, the subrecipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the applicant serves the same type of persons (e.g., families with children, unaccompanied youth, veterans, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The subrecipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

Homeless Persons Involvement – To the maximum extent practicable, the subrecipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted ESG.

Consolidated Plan – All activities the subrecipient undertakes with assistance under ESG are consistent with the State's current HUD-approved consolidated plan.

Bonnie Malo
Signature/Authorized Official

5/11/2015
Date

Director
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING REQUIREMENTS:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than $10,000 and not more than $100,000 for each such failure.