



#### I. Targeted Community Lending Plan (TCLP or Plan) Overview

The purpose of the TCLP is to:

- Describe how the Federal Home Loan Bank Des Moines (FHLB Des Moines or Bank)
  will address the unmet credit needs and market opportunities for targeted
  community lending<sup>1</sup> in its district, which is composed of 13-states and three U.S.
  Territories
- Identify significant affordable housing needs in the Bank's district that will be addressed through its Affordable Housing Program (AHP) as set forth in the AHP Implementation Plan

To achieve these objectives, the FHLB Des Moines:

- Reflects market research in its TCLP
- Consults with its Affordable Housing Advisory Council<sup>2</sup> (AHAC or Advisory Council), financial institution members, housing associates, and public and private community and economic development organizations
- Establishes quantitative performance goals

Diversity, Equity, and Inclusion

The Bank is committed to a culture of diversity, equity, and inclusion among the Bank's directors, Advisory Council members, employees, grant recipients and suppliers. Diversity encompasses many visible characteristics such as race, gender, age and less obvious characteristics like personality style, ability, education, ethnicity, religion, job function, life experience, life style, sexual orientation, geography, regional differences, socioeconomic status, work experience and family situation. The Bank values differences, which enables it to more effectively fulfill its mission, realize its vision, live its values and achieve its financial goals.

In support of these objectives, the Bank offers Community Investment products that meet the affordable housing and community lending needs of our district. Additionally, the AHP page of the Bank's public website provides resources for AHP sponsors to explore ways to engage Minority-, Women- and Disabled-Owned Businesses (MWDOBs) as diverse suppliers in the development, acquisition, rehabilitation, and operations of affordable housing projects.

<sup>&</sup>lt;sup>1</sup> 12 CFR 1292.1 defines "targeted community lending" as providing financing for economic development projects for targeted beneficiaries. "Economic development" is further defined as "commercial, industrial, manufacturing, social service, and public facility projects and activities and (2) public or private infrastructure projects, such as roads, utilities, and sewers."

<sup>&</sup>lt;sup>2</sup> The Advisory Council provides advice to the FHLB Des Moines' board of directors about the unmet credit needs in the Bank's district. There are 15 Advisory Council members, one representing each of the 13 states in the Bank's district and two at-large positions. All Advisory Council members are actively engaged in providing or promoting affordable housing and community lending.



#### II. Market Research

#### A. Overview

The FHLB Des Moines' engages with a broad range of stakeholders to gain insight into its district's affordable housing, community development, and economic development needs and opportunities.

The FHLB Des Moines is comprised of more than 1,200 member financial institutions, including commercial banks, thrifts, credit unions, insurance companies and community development financial institutions (CDFIs). Our members and housing associates<sup>3</sup> further inform our assessment of the affordable housing and community lending needs of our district, and play an important role in strengthening economic opportunity in the communities they serve.

The Bank references widely accepted industry sources for quantitative data and trends about affordable housing markets such as, but not limited to, Harvard University's Joint Center for Housing Studies and publications produced by our members' regulators, National Low-Income Housing Coalition, U.S. Department of Housing and Urban Development (HUD), Urban Institute, and others.

Our participation in local and regional housing, economic development, community development, and community lending events as well as ongoing conversations with stakeholders further informs our understanding of the unmet credit needs in our district. These interactions also provide important context for how to best structure community investment products to support our members' ability to meet those needs.

Additionally, at least four Bank staff are actively involved in on-going dialogue through participation in reoccurring committees and service on boards of directors with nonprofit organizations that promote affordable housing or community lending. These engagements serve to deepen the Bank's understanding of a range of community investment needs such as the varying dynamics that impact affordable rental and owner-occupied housing in urban, rural, and Native communities.

#### B. FHLB Des Moines District Summary

The FHLB Des Moines has the largest geographic district among the 11 Federal Home Loan Banks. The Bank's district includes the 13 states of Iowa, Minnesota, Missouri, North Dakota, South Dakota, Idaho, Montana, Utah, Wyoming, Washington, Oregon, Alaska, and Hawaii, as well as the U.S. Territories of American Samoa, Guam, and the Northern Mariana Islands.

<sup>&</sup>lt;sup>3</sup> State and local housing associates that meet certain statutory and regulatory criteria may borrow from the Bank; while eligible to borrow, housing associates are not members.



Encompassing 40% of the U.S. land mass and 11% of the U.S. population<sup>4</sup>, the Bank's district is diverse, ranging from dense urban centers such as Honolulu, Minneapolis, and Seattle to expansive rural counties and remote Native Alaskan Villages that are not accessible by road. The economies of these communities are also diverse ranging from agricultural and ranching to technology to tourism to energy and much more.

In preparation for a modernized AHP regulation that became effective, in full, on January 1, 2021, the Bank enhanced its market research activities.

An independent third-party economist conducted an assessment of published market information pertaining to affordable rental and owner-occupied housing, as well as targeted community lending, for each of the 13 states in the Bank's district. The overarching affordable housing needs identified by these published market assessments corroborated what had been identified by the Bank's Advisory Council and further supported by widely accepted industry sources and the Bank's own market intelligence gained through dialogue with its members, housing associates, and community partners.

Collectively, these sources and the information presented in this Plan were used by the Bank to identify and assess the significant affordable housing needs that would be addressed through its 2023 AHP and related 2023 AHP scoring criteria.

C. Advisory Council Assessment of Priority Affordable Housing Needs

The Advisory Council assessed priority affordable housing needs for the Bank's district, through which the following needs were identified:

- Housing for homeless households
- Housing for Native People
- Rental housing for households with incomes at or below 50% of area median
- Housing for the elderly
- Preservation of affordable housing
- Housing of people with disabilities
- Rural housing
- Housing that provides empowerment services

<sup>&</sup>lt;sup>4</sup> Merging Markets, Housing Assistance Council, 2015



D. Summary of Published Market Information for the Bank's 13 States

The report of published market information that was prepared by an independent third-party economist categorized the Bank's district into three regions: Northern Midwest; Intermountain West; and Northern Pacific and Hawaii. Grouped accordingly, a summary of each state's priority housing needs by order of magnitude as well as the report's assessment of special circumstances for each state are summarized below.

In 2022, the Advisory Council refreshed state information as needed.

D(i). Northern Midwest: Iowa, Minnesota, Missouri, North Dakota, South Dakota

#### Iowa

- Affordable rental housing for households with incomes at or below 30% and 50% of area median
- Affordable owner-occupied housing for households with incomes at or below 30% and 50% of area median

Iowa Special Circumstances: Within its 2018 Assessment of Fair Housing, Iowa reported more acute need in urban areas that are growing faster than many rural areas.<sup>5</sup>

#### <u>Minnesota</u>

- Affordable rental housing for households with incomes at or below 30% of area median
- Affordable homeownership for households of color<sup>6</sup> Retention of existing affordable housing stock

Minnesota Special Circumstance: Within Minnesota's Consolidated Plan, the State identifies a need for affordable housing for low-income households, largely due to escalating home costs. Leveraging funds from state and federal programs to provide more housing is recognized as a major challenge. Incentivizing and prioritizing housing development is a statewide housing goal.<sup>7</sup>

#### Missouri

 Affordable rental housing for households with incomes at or below 40% and 60% of area median

<sup>&</sup>lt;sup>5</sup> 2018 State of Iowa Analysis of Impediments to Fair Housing Choice

<sup>&</sup>lt;sup>6</sup> Minnesota Housing 2020-21 Affordable Housing Plan, Public Comment Draft, August 29, 2019

<sup>&</sup>lt;sup>7</sup> More Places to Call Home: Investing in Minnesota's Future – Report of the Governor's Task Force on Housing, August 2018



 Affordable owner-occupied housing for households with incomes at or below 40% and 60% of area median

Missouri Special Circumstance: According to the 2012 Housing Needs Assessment, new housing construction outpaced household formation until 2010. Since then, however, household formation has outpaced the addition of housing units, particularly for lower-income households. While construction and permitting activity are higher in urban areas, it has not been sufficient to satisfy the magnitude of need.

#### North Dakota

- Supply of affordable housing across all household age groups and incomes
- · Affordable housing for low-income and elderly households
- Homeownership for first-time homebuyers

North Dakota Special Circumstances: The state expects that demographic shifts in the aging of baby boomers and the in-migration of younger households will continue to increase demand for rental and/or multi-family housing. According to the North Dakota Housing Finance Agency, the state's most prominent housing affordability challenges are cost burdened renters and homeowners, escalating costs, particularly for renters, and an aging housing stock requiring rehabilitation.

#### South Dakota

- Housing affordability for households at or below 30% of area median income
- Homeownership rehabilitation programs and assistance for homeowners in maintaining their homes
- Rental housing in substandard condition, overcrowding, and cost burdened

South Dakota Special Circumstances: Housing cost burden tends to be acute for Native American and Hispanic households. The state is confronting substandard housing conditions, which is being addressed by state and local governments and nonprofit organizations.<sup>8</sup>

D(ii). Intermountain West: Idaho, Montana, Utah, Wyoming

#### <u>Idaho</u>

• Rental housing for households with incomes at or below 30% of area median

<sup>&</sup>lt;sup>8</sup> <u>South Dakota Housing Development Authority and Governor's Office of Economic Development 2018-2022 Five</u> Year Housing and Community Development Consolidated Plan



- Homeownership for households with incomes at or below 50% of area median.
- Rental housing for households with incomes at or below 80% of area median

Idaho Special Circumstances: The most common housing challenge is cost burden as household incomes have not kept pace with escalating housing costs since 2000. The impact of market-rate or above market-rate property development on surrounding neighborhoods often leads to higher levels of evictions and displacement. Disinvestment or poor maintenance in rental housing is particularly acute for rural areas. The impact of these barriers has been higher for certain ethnic and racial populations as well as elderly residents.<sup>9</sup>

#### Montana

- Affordable housing related to escalating cost of housing
- Public funding to support housing development
- Ensuring that the regulatory environment is not an impediment to housing production

Montana Special Circumstances: In general, Montana communities employ a minimum of land use regulations related to housing development. Generally speaking, the state has traditionally not funded housing assistance, which instead has been supported by federal funds and private donations. While the state's regulatory framework makes housing less expensive to develop, funding to incentivize affordable housing projects has been difficult to obtain. The state is exploring strategies to support funding for affordable housing through state and local jurisdictions.<sup>10</sup>

#### Utah

- Demand for rental housing is outpacing supply causing an affordability problem for rental housing, particularly units for households with incomes below at or below 50% of area median
- Increasing housing supply
- Rental housing for households with incomes at or below 30% of area median

Utah Special Circumstances: Housing production has generally kept pace with demand except for housing affordable for lower-income households. The state's policy priorities are focused on facilitating coordination between public and private organizations and agencies for funding affordable housing for low-income households and homeless populations.

<sup>&</sup>lt;sup>9</sup> Idaho Housing and Finance Association Housing Information

<sup>&</sup>lt;sup>10</sup> Montana Budget and Policy Center State and Local Strategies to Improve Housing Affordability



#### **Wyoming**

- Alleviating cost burden for households with costs that exceed 30% of household income, including elderly households
- General lack of affordable housing stock in a range of sizes
- Lack of access to housing for people with disabilities

Wyoming Special Circumstances: Availability of sufficient resources to subsidize affordable housing is a state challenge. Affordable housing challenges are exacerbated by disparities in access to resources by special needs populations.<sup>11</sup>

D(iii). Northern Pacific and Hawaii: Washington, Oregon, Alaska, Hawaii

#### <u>Washington</u>

- Affordable housing for households with incomes at or below 30% and 50% of area median
- Homeownership for households with incomes at or below 30% and 50% of area median
- Housing for homeless and special needs households, including veterans and households carrying significant health care costs

Washington Special Circumstances: Statewide, the single largest affordable housing need is rental units for households earning up to 30% of area median income, particularly in the Puget Sound region and southeast and southwestern parts of the state. Washington has been working to incentivize multi-family housing in general and affordable multi-family housing in particular. The state recognizes that its housing stock of mostly single-family homes is not a match for the demands of its changing demographics driven by smaller and nonfamily households. The most severely cost burdened demographic is households under the age of 35. In addition, Washington identified that low-income and non-white households are more likely to face challenges related to housing discrimination.<sup>12</sup>

#### Oregon

- Affordable housing, particularly rental housing, for households with incomes at or below 30% and 50% of area median income
- Affordable homeownership for households between 50% and 120% of area median income

<sup>&</sup>lt;sup>11</sup> 2017 State of Wyoming Regional Assessment of Fair Housing

<sup>&</sup>lt;sup>12</sup> Washington State Department of Commerce Affordable Housing Needs Study – 2015, and Puget Sound Regional Council Vision 2050 Housing Background Paper



 Weatherization of energy-burdened households with incomes up to 60% of area median

Oregon Special Circumstances: Escalating housing prices, stagnant wages, and a shortage of affordable housing units are the primary factors driving the state's housing needs. Cost burden for low- and moderate-income households is the most severe challenge, followed by overcrowding and/or dilapidated housing conditions. Housing needs are disproportionately greater for special needs populations, including people with disabilities, the elderly and others.<sup>13</sup> The state recently instituted a statewide elimination of exclusionary single-family zoning in an effort to mitigate underproduction of housing.

#### Alaska

- Affordable housing for household with incomes at or below 30% of area median, including permanent supportive housing for people experiencing homelessness
- New affordable housing in rural areas to alleviate overcrowding
- Weatherization and energy efficiency
- Senior housing

Alaska Special Circumstances: The rate of overcrowding in Alaska is twice the national average, with the challenge more acute in rural areas. In some rural areas, more than half of all households are overcrowded. The population of senior citizens is expected to nearly double by 2030. To keep pace, more than 300 assisted and independent living facility beds must be added each year. Due to the state's severe climate, there is a significant need for weatherization and energy efficiency of housing units to moderate energy expenses for cost burdened households. <sup>14</sup>

#### <u>Hawaii</u>

- Affordable housing, particularly rental housing, for household with incomes up to 30% of area median
- Affordable housing, particularly on Oahu and Hawaii, for households with incomes between 60% and 80% of area median income
- Housing for homeless households, including those with and without special needs

Hawaii Special Circumstances: State policy is not favorable to single-family housing due to limited land mass. Subtracting open water, wetlands, and sloped areas, the percentage of land suitable for development is the lowest in the U.S. Additionally, construction costs are above average and the regulatory environment and review process are barriers to production.<sup>15</sup>

<sup>&</sup>lt;sup>13</sup> Oregon.gov Summary Housing Needs Assessment

<sup>&</sup>lt;sup>14</sup> Alaska Housing Finance Corporation 2018 Statewide Housing Assessment

<sup>&</sup>lt;sup>15</sup> Hawaii Housing Finance & Development Corporation: Hawai'i Housing Planning Study, 2019



#### E. Summary of Published Market Information for the Bank's Three U.S. Territories

Two of the Bank's U.S. Territories, Guam and the Northern Mariana Islands, are located in the North Pacific Ocean and the third, American Samoa, is located in the South Pacific Ocean. Financial institution presence in these territories is limited. For example, there are four FHLB Des Moines members chartered in Guam and none chartered in American Samoa or the Northern Mariana Islands.

#### American Samoa

American Samoa is comprised of a group of islands. Of the three territories in the Bank's district, it is the closest to Hawaii. There are a total of 14 U.S. Territories throughout the Caribbean Sea and Pacific Ocean. Among them, only people born in American Samoa are considered non-citizen nationals. Notwithstanding their citizenship status, the people of American Samoa are known to have the highest per-capita rate of military participation of any U.S. state or territory. 17

Approximately 90% of residents are native Samoan, making it the most homogenous territory in the U.S. Of note, however, is that native Samoans are not members of a Federally recognized tribe. The American Samoan constitution upholds the matai leadership system and communal land ownership. Matai translates roughly to "title," and matai leaders oversee control of communal land that can only be owned, sold, and developed within small communities. This makes up 96% of all property in American Samoa. Samoan law restricts the sale of most property to anyone with less than 50% Samoan ancestry.

Access to financial institutions is limited, and there are no FHLB Des Moines' members charted there. The area is home to one of two public banks operating in the U.S. Notably, the other public bank is located in North Dakota, which is also a part of the Bank's district.<sup>20</sup>

There is not a Community Development Financial Institution<sup>21</sup> Tribally Designated Housing Entity,<sup>22</sup> or affordable housing project financed by low income housing tax credits<sup>23</sup> in American Samoa.

<sup>&</sup>lt;sup>16</sup> World Atlas: What are the US Territories?

<sup>17</sup> Brown Political Review: American Samoa Tribal Sovereignty - April 6, 2022

<sup>&</sup>lt;sup>18</sup> Brown Political Review: American Samoa Tribal Sovereignty - April 6, 2022

<sup>&</sup>lt;sup>19</sup> ABC News: Not all born in American Samoa want US citizenship – February 10, 2020

<sup>&</sup>lt;sup>20</sup> Washington Post: When Banks abandoned American Samoa...

<sup>&</sup>lt;sup>21</sup> U.S. Department of Treasury: CDFI Certification. See Appendix for full list of Certified Native CDFIs.

<sup>&</sup>lt;sup>22</sup> U.S Department of Housing and Urban Development: National Directory of Tribes and TDHEs by ONAP Regions

<sup>&</sup>lt;sup>23</sup> <u>LIHTC Database</u>. Data available for projects placed in service through 2020.



The Samoa Housing Corporation is a state-owned enterprise that provides rental housing and financing for mortgage loans and other securities for housing purposes.<sup>24</sup>

The Development Bank of American Samoa (DBAS) provides affordable mortgage loans for new home construction and home repair as well as commercial loans to support business development. DBAS is also the conduit for federal assistance programs to facilitate housing for low-income families and individuals.<sup>25</sup> For example, DBAS administers HUD's HOME program and has been designated as lead authority for American Rescue Plan Act funds.<sup>26</sup>

#### <u>Guam</u>

Guam is an island located on the west side of the International Date Line, meaning it is one day ahead of the U.S. Japan is roughly twice as close to Guam as Guam is to Hawaii. The military base and tourism are the island's economic engines, as is construction from the public, commercial, and residential sectors.

The indigenous people of Guam are Chamorro, <sup>27</sup> however, Chamorro is not a Federally recognized tribe.

There are five FHLB Des Moines members chartered in Guam, two of which are credit unions. Two Community Development Financial Institutions serve the island, one of which is a credit union and the other is a loan fund.<sup>28</sup>

A total of 14 affordable housing projects providing approximately 1,200 units financed by low-income housing tax credits are located on Guam.<sup>29</sup> More than 30% of these units will revert to market rate housing by 2030.<sup>30</sup>

There is not a Tribally Designated Housing Entity serving the island.<sup>31</sup>

While a comprehensive affordable housing plan has not been developed, priority housing needs have been identified for the elderly, homeless, and special needs populations. Of note, the proportion of rental and owner-occupied units and monthly housing costs for each are nearly even.<sup>32</sup>

<sup>&</sup>lt;sup>24</sup> Samoa Housing Corporation

<sup>&</sup>lt;sup>25</sup> Development Bank of American Samoa

<sup>&</sup>lt;sup>26</sup> Samoa News: DBAS designated to lead ARPA Affordable Home Loan Program, February 24, 2022

<sup>&</sup>lt;sup>27</sup> Britannica: Guam

<sup>&</sup>lt;sup>28</sup> U.S. Department of Treasury: CDFI Certification

<sup>&</sup>lt;sup>29</sup> <u>LIHTC Database</u>, data available for projects placed in service through 2020

<sup>&</sup>lt;sup>30</sup> Guam Housing Study and Needs Assessment, January 2020

<sup>&</sup>lt;sup>31</sup> US Department of Housing and Urban Development National Directory of Tribes and TDHEs by ONAP Regions

<sup>32</sup> Guam Housing Study and Needs Assessment, January 2020



Compared to the other two territories in the Bank's district, Guam has a greater population size and number of affordable housing and community development organizations.

#### Northern Mariana Islands

The Northern Mariana Islands is composed of 22 islands and islets and, like Guam, is located on the west side of the International Date Line. Some sources cite Chamorro as being the islands' indigenous people.<sup>33</sup>

Access to financial institutions is limited, and there are no FHLB Des Moines members chartered there. Nor are there Community Development Financial Institutions or Tribally Designated Housing Entities.

A total of five affordable rental projects financed with low income housing tax credits are located in this Territory, all of which are located on Saipan.

Among the 17 selection criteria set forth in the 2021-2022 Qualified Allocation Plan are projects that provide three or more bedrooms, commit to offer units for sale or lease to existing tenants after the compliance period, and that provide affordable housing on the islands of Tinian and Rota.<sup>34</sup>

Priority affordable housing and community lending needs include:

- Special needs and low- and moderate-income housing
- Sustaining affordable housing stock
- Increasing homeowner education and counseling
- Public facilities and improvements.<sup>35</sup>

The Northern Marianas Housing Corporation (NMHC) serves the low- and moderate-income populations of Saipan, Tinian, and Rota. This organization administers federal housing programs and direct loans to qualified households for housing construction, developing and managing rental housing projects, and participating as a guarantor or trustee in housing loan programs. Shortages in construction labor and services have been identified as challenges and the creation of new typhoon resistant homes as opportunities.<sup>36</sup>

<sup>&</sup>lt;sup>33</sup> Britannica: Chamorro

<sup>&</sup>lt;sup>34</sup> Commonwealth of the Northern Mariana Islands Low Income Housing Tax Credit Program 2021 – 2022 Qualified Allocation Plan

<sup>&</sup>lt;sup>35</sup> Annual Community Assessment Report for Program Year 2020

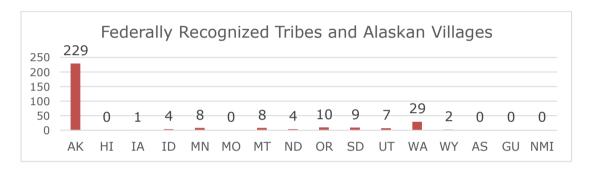
<sup>&</sup>lt;sup>36</sup> Northern Marianas Housing Corporation Citizen Centric Report FY 2021



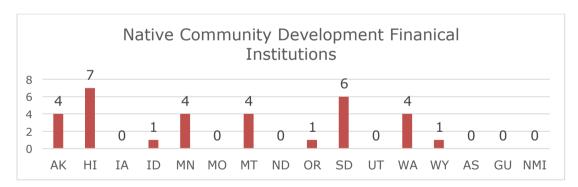
#### F. American Indian, Alaska Native, and Native Hawaiian

#### F(i). Overview

The Bank's district is home to approximately 30% of the U.S. Native population<sup>37</sup>. This population resides in urban and rural communities as well as on Tribal land, in Native Alaskan Villages, on Department of Hawaiian Homelands, and in the district's U.S. Territories. Moreover, in the U.S., there are 574 Federally recognized tribes, 311 of which are located in the Bank's district.<sup>38</sup>



The FHLB Des Moines district is also home to 32 of a total 69 Native Community Development Finance Institutions.<sup>39</sup>



Refer to the Appendices for a listing of Federally recognized tribes, Native Community Development Financial Institutions, Tribally Designated Housing Entities, and information about the number of Native people living in the Bank's district.

Several organizations provide information about government and non-profit programs that target the affordable housing and community economic development needs of Native communities. For example, the Federal Reserve Bank of Minneapolis' Center for

<sup>&</sup>lt;sup>37</sup> Merging Markets, Housing Assistance Council, 2015

<sup>&</sup>lt;sup>38</sup> National Conference of State Legislatures, Federal and State Recognized Tribes. See Appendix for full list of Alaskan Villages and Federally Recognized Tribes.

<sup>&</sup>lt;sup>39</sup> <u>US Department of the Treasury CDFI Certification</u>. See Appendix for full list of Certified Native CDFIs.



Indian Country Development and the National American Indian Housing Council provide links to, among other topics, research, resources, events, and trainings.

FreddieMac reports that, in 2019, the homeownership rate for Native Americans was 50.8%, while the rate for white non-Hispanic Americans was 73.3%. This 22.5% point difference showcases the significant homeownership gap for Native Americans. 40

A 2017 study by HUD's Office of Policy Development and Research<sup>41</sup> reports on the housing needs of Alaskan Natives and American Indians, and refers to both populations collectively as American Indian and Alaskan Native (AIAN). Information is also reported about Native Hawaiian housing needs. The Native housing needs reported below were largely sourced from this HUD study.

*F(ii).* Native American

The Federal Reserve Bank of Minneapolis' Center for Indian Country Development (CICD) cites "five factors that reinforce barriers to housing in Indian Country:

- Native nations are sovereign but their land is held in trust and must have its titled cleared by the US Government. Mortgages on trust land are also leasehold mortgages as opposed to fee-simple mortgages. Housing professionals and home buyers frequently identify these realities as significant hurdles
- Indian Country home buyers often face an uphill battle working with lenders to finance their home. Our economists' work shows that Native American borrowers on tribal lands are more likely to receive high-cost loans, leaving them to ultimately pay more for their homes over the life of a mortgage
- The tools designed to work in Indian Country are underutilized on trust land. This
  applies to Indian Country-specific products like HUD's Section 184. It is also true
  of products whose features make them relevant in Indian Country, like USDA's
  Section 502 loan program
- The federal government's failure to fulfill treaty obligations. Developments in Indian Country often pay today for the resulting historical underinvestment in physical infrastructure. For example, poor access to water or transportation raises the price of construction
- Federal funding sources with different eligibility and process requirements complicate the pre-construction process in, and may not reflect the unique needs of Indian Country"

CICD research suggests four recommendations:

<sup>&</sup>lt;sup>40</sup> https://sf.freddiemac.com/articles/insights/empowering-native-american-communities-with-lending-and-homeownership-opportunities

<sup>41</sup> Assessment of American Indian, Alaska Native, and Native Hawaiian Housing Needs



- "The federal government should continue to expand the financial capacity of Native community development financial institutions, or Native CDFIs, and other tribal institutions. Native CDFIs offer community-grounded credit solutions in Indian Country. Research suggests that the presence and activities of Native CDFIs increase the credit score of Indian Country residents that previously had the lowest credit scores
- The federal government can create a normalized and complementary interagency lending process in Indian Country
- An improved title process on trust land would support housing development and tribal sovereignty
- Data on Native Americans and Indian Country programs should be improved.
  With some exceptions, existing sources are often insufficient to assess policy
  impacts or changes in population-level well-being. Illuminating economic
  conditions in Indian Country will require collaboration on methodologies and new
  financial resources to obtain sufficient statistical samples."<sup>42</sup>

#### F(iii). Alaska Native

The 1971 Alaska Native Claims Settlement Act established the U.S. government's current relationship with Alaska Natives. Under this Act, persons possessing "one-quarter or more Native blood" were automatically enrolled in a regional corporation, which is the governing body for overseeing land and resources of its members. In 1993, the U.S. Department of the Interior issued a ruling stating that Native villages and corporations have the same status as Tribes and are, "entitled to the same protection, immunities, and privileges as other acknowledged tribes."

#### F(iv). Native Hawaiian

"Unlike its relationship with Native American Tribes and Native Alaskan Villages, the U.S. government does not maintain a formal government-to-government relationship with the Native Hawaiian community as an organized, sovereign entity. No single agency in Hawaii is responsible for housing for the Native Hawaiian community, unlike the tribally designated housing entities (TDHEs) or tribal housing departments that operate housing programs in most other Native communities."

<sup>&</sup>lt;sup>42</sup>Summary of written testimony of Alene Tchourumoff, SVP, Center for Indian Country Development, Federal Reserve Bank of Minneapolis, United States Senate Committee on "Housing for Native Americans: Review of Federal Programs, Barriers, and Opportunities, May 27, 2021"

<sup>&</sup>lt;sup>43</sup> Administration for Native Americans: American Indians and Alaska Native-What About Alaska?

<sup>&</sup>lt;sup>44</sup> Housing Needs of Native Hawaiians: A Report from the Assessment of American Indian, Alaska Native, and Native Hawaiian Housing Needs



"In 1920, 39 years before statehood for Hawaii, the federal Hawaiian Homes Commission Act (HHCA) set aside approximately 200,000 acres for the use of Native Hawaiians who are descendants 'of not less than one-half part of the blood of the races inhabiting the Hawaiian Islands previous to 1778.' The act established 'a permanent land base for the benefit and use of native Hawaiians.' One of its goals was to enable 'the preservation of the values, traditions, and culture of native Hawaiians.' HHCA created the Department of Hawaiian Home Lands (DHHL) to administer the home lands. Individuals who meet HHCA's definition of a Native Hawaiian may assume a residential lease on the home lands if they can buy or build a home on the leased lot."

"A 2017 HUD study reported as a principal finding the significant need for affordable housing among Native Hawaiians, especially among Native Hawaiians waiting for a lease on the Hawaiian homelands. The assessment also found that many Native Hawaiians strongly prefer housing and communities that support multigenerational and extended family ('ohana') living and socializing, which is part of traditional Native Hawaiian culture."

#### III. Significant Affordable Housing Needs Addressed in the AHP Scoring Criteria

Assessment of Significant Affordable Housing Needs for Each State in the Bank's District

The culmination of priorities identified by the Advisory Council, the independent third-party economist's report of published market assessments, the Bank's outreach to members, housing associates, and community partners, information provided by various industry publications, and the Bank's assessment of the distribution of AHP funds throughout its district are captured in the competitive AHP's 2023 scoring criteria, which may be viewed in its entirety in the 2023 AHP Implementation Plan. These priorities include but are not limited to awarding points for:

- Housing for homeless households
- Housing for special needs populations, including but not limited to the elderly and disabled households
- Native housing
- Rental housing for households with incomes at or below 50% of area median
- Preservation of affordable housing
- Rehabilitation for existing homeownership units
- New construction of owner-occupied housing

<sup>&</sup>lt;sup>45</sup> HUD, PD&R Edge Magazine, published July 24, 2017

<sup>&</sup>lt;sup>46</sup> Housing Needs of Native Hawaiians: A Report from the Assessment of American Indian, Alaska Native, and Native Hawaiian Housing Needs



Variable points for In District projects

#### AHP Awards in Urban and Rural Areas

It is important to note that since 2016, AHP has been effective in awarding funds to projects in both urban and rural areas<sup>47</sup>. The Bank's Board and its Advisory Council consider the AHP portfolio's balance of urban and rural projects to be responsive to the needs of our diverse district.

2016: 54 AHP projects awarded – of which – 39% are rural 2017: 78 AHP projects awarded – of which – 45% are rural 2018: 109 AHP projects awarded – of which – 41% are rural 2019: 85 AHP projects awarded – of which – 44% are rural 2020: 63 AHP projects awarded – of which – 56% are rural

2021: 67 AHP projects awarded – of which – 39% are rural

#### AHP Awards to Low- and Very-Low Income Households

Also noteworthy is that, since 2016, a significant proportion of AHP awards have been made to households with incomes at or below 30% and 50% of area median.<sup>48</sup>

2016: 68% units  $\leq$  50% AMI - of which - 46% units  $\leq$  30% AMI 2017: 67% units  $\leq$  50% AMI - of which - 46% units  $\leq$  30% AMI 2018: 66% units  $\leq$  50% AMI - of which - 55% units  $\leq$  30% AMI 2019: 60% units  $\leq$  50% AMI - of which - 55% units  $\leq$  30% AMI 2020: 56% units  $\leq$  50% AMI - of which - 44% units  $\leq$  30% AMI 2021: 53% units  $\leq$  50% AMI - of which - 33% units  $\leq$  30% AMI

#### AHP Awards for Native Projects

The FHLB Des Moines has a long-standing commitment to helping to finance affordable housing that meets Native needs. The AHP scoring criteria prioritizes these needs in its

 $<sup>^{47}</sup>$  Figures represent AHP projects at time of approval by the Board of Directors. Does not include funded alternates. Does not account for withdrawn projects.

<sup>&</sup>lt;sup>48</sup> Figures consistent with data reports to FHFA. See Application File for 1.1.2016 through 12.31.2021. Data includes funded AHP alternates, withdrawn, and number of units proposed (not as modified). Alternates include any approved during the reporting period.



District Priority with effective results. From 2019 through 2021, Native projects have been awarded, on average, 26% of total AHP funds. Additionally, when Native projects apply, they are awarded an average 72% of the time.<sup>49</sup>

2019: 67% of Native projects that applied were awarded, receiving 22% of AHP funds

2020: 74% of Native projects that applied were awarded, receiving 30% of AHP funds

2021: 76% of Native projects that applied were awarded, receiving 25% of AHP funds

AHP Awards Throughout the Bank's District

The Bank regularly assess the geographic distribution of annual AHP awards to evaluate the extent to which awards are made in our district's 13 states and three U.S. Territories.

While it is understood that anomalies may occur in a given year, the Bank has observed a pattern whereby the states of Hawaii and Wyoming as well as the district's three U.S. Territories have been challenged to receive AHP awards annually. Additionally, albeit to a lesser extent, the states of Montana, Oregon, North Dakota, and Utah have also experienced periodic challenges.

To better support the distribution of funds to these areas of our district, the AHP scoring criteria's In-Distict criterion has a variable points structure. Maximum points in this category are awarded to Hawaii, Wyoming, Guam, American Samoa, and the Northern Mariana Islands. Additional points are also assigned to Montana, Oregon, North Dakota, and Utah.

The Bank will continue to monitor the geographic distribution of each AHP funding round, and consider adjustments as needed to ensure that the Bank serves all parts of its district, including tribal communities.

#### IV. Targeted Community Lending

In addition to compiling information about affordable housing, the independent thirdparty economist's report concluded that, to the extent that community economic development needs are captured in published needs assessments, those needs are aligned with the eligibility criteria for the Bank's Community Investment Advances (CIAs).

Examples of identified priority community economic development needs in the Bank's district include:

<sup>&</sup>lt;sup>49</sup> Figures represent AHP projects at time of approval by the Board of Directors. Does not include funded alternates. Does not account for withdrawn projects



- Downtown revitalization and cure of blight
- Brownfield revitalization
- Public facilities and infrastructure, especially to spur employment
- Rural broadband extension and provision

The Bank's CIAs may be used by its members to finance eligible housing and targeted community lending activities. On a given year since 2016<sup>50</sup>, between 55% and 63% of CIAs have been used to finance targeted community lending. Refer to Section V of this TCLP for additional information about CIAs.

#### V. FHLB Des Moines' Support of Unmet Credit Needs

Community Investment Products

The Bank offers a competitive AHP, two down payment products called Home\$tart and the Native American Homeownership Initiative (NAHI), and Community Investment Advances (CIAs).

- The competitive AHP provides equity to help finance the development, rehabilitation, or acquisition of affordable rental or owner-occupied housing. Members apply for the AHP subsidy on a housing sponsor's behalf on an annual basis.
- Home\$tart provides equity in the form of down payment or closing cost assistance to eligible first-time homebuyers to help finance their purchase of an owner-occupied unit. Members apply for the subsidy on behalf of an eligible homebuyer. Funds are made available on a first-come, first-served basis.
- NAHI is similar to Home\$tart in that it provides equity in the form of down payment
  assistance, and funds are made available to members on a first-come, first-served
  basis. However, NAHI funds are specifically set aside for members of a Federally
  recognized tribe, members of an Alaskan Village and regional Corporation established
  pursuant to the Alaskan Native Claims Settlement Act, and for Native Hawaiians who
  are eligible to reside on Hawaiian Home Lands. Additionally, NAHI provides a deeper
  subsidy per household compared to Home\$tart.
- Effective in 2023, the Bank will offer up to \$3 million in discretionary grant funds for areas of the Bank's district that did not receive an AHP award the previous year. Within the district's 13 states, the Bank will match member's contributions to nonprofit or government agencies that support affordable housing or community economic development on a dollar for dollar basis. Within the district's three U.S. Territories, the Bank will provide up to \$5,000 grants per territory to support local affordable housing, community economic development, or community engagement. The strategy for allocating these discretionary grant funds ensures that, on an

 $<sup>^{50}</sup>$  Figures consistent with data reports to FHFA. CIA data reported to FHFA annually; covers period 1.1.2016 through 12.31.2021.



annual basis, all parts of the district are served by the Bank's community investment offerings

• CIAs offer members a reduced-rate on certain advances with terms of 1- to 30-years for eligible housing and community economic development financing. Funds are available on an ongoing basis. The maximum outstanding CIA balance per member is limited to \$10 million.

In addition to several other eligibility criteria, CIAs may be used to provide financing for targeted community lending for projects located in an Indian area as defined by the Native American Housing Assistance and Self Determination Act, an Alaskan Native Village, or Native Hawaiian Home Lands.

The Bank's president/CEO or designee may waive the CIA member cap for eligible activities located in a Federal disaster area to allow the rebuilding of communities affected by such disasters. The Bank reserves the right to cap the amount of CIA advances to any single member for use in a Federal disaster area. CIA approved for this purpose must be originated within 18 months of the disaster declaration.

The Bank's community outreach activities raise awareness about the availability of these products and how they can be deployed to support the unmet credit needs in the Bank's district. Moreover, technical assistance is regularly provided to members and housing partners to support their access to these products.

Housing Associates and Community Development Financial Institutions (CDFIs)

The Bank also engages in outreach to housing associates to explore opportunities for executing Stand-by Bond Purchase Agreements, and promotes business with existing and prospective CDFI members such as but not limited to identifying opportunities to utilize the Bank's advances and CIAs to support CDFI's community lending.

## VI. Encourage Members to Increase Targeted Community Lending and Affordable Housing Finance

In 2022, the Bank deployed several strategies to encourage members to increase their targeted community lending and affordable housing finance: (1) incorporate community investment objectives into the Bank's Strategic Business Plan; (2) through product promotion, highlight for members the connection between the availability of CIAs and the community lending needs identified in this Plan; (3) provide intentional and targeted outreach to Native communities; (4) provide technical assistance to promote ease of use for members' and housing sponsors' participation; and (5) raise awareness about community investment products and build relationships with community partners throughout our district.

(1) Community Investment in the Bank's Strategic Business Plan



The Bank's Strategic Business Plan (SBP) recognizes Community Investment products as a strength, a strategic asset, and a key component of the Bank's value proposition to members. The quantitative goal for CIA originations included in this TCLP is also featured in reports to the Board of Directors among a suite of metrics that are applicable to the SBP.

#### (2) Promote Community Investment Advances (CIAs)

Through direct email communications to members, the Bank raises awareness about CIA's eligible uses and participation requirements. This outreach emphasizes CIA's ease of use, broad eligibility criteria, and benefits to members' efforts to finance housing and community economic development projects and activities. It also highlights that CIAs may be applied to meet examples of community economic development needs identified in this TCLP.

#### (3) Targeted Outreach to Native Communities

#### FHLB Des Moines Native Outreach Directory

The Bank's public website offers a Native Directory that is designed to facilitate partnerships between members and Native CDFIs and TDHEs. An inter-active regional map of the Bank's 13-states enables members to quickly locate Native partners, and links to the Member Directory allows Native partners to quickly locate members. Additional links to information about the Bank's community investment products are provided to support these stakeholders' efforts to unlock financing opportunities that support affordable housing and community economic development on Native lands and for Native people.

#### Collaboration with Northwest Area Foundation to Invest in Native CDFIs

In January 2022, the Northwest Area Foundation (NWAF) and FHLB Des Moines issued a joint press release to showcase the expertise and wisdom of Native-led initiatives that help Native communities to thrive.

In 2017, the Bank awarded \$5 million to the NWAF in support of the organizations' shared commitment to investing in Native-led strategies for building economic strength and resiliency. The NWAF regranted the funds to Native CDFIs, which understand the need to weave together Native culture and values while providing financial education around their lending activities to a population that historically has been largely unbanked. The model of self-determination draws on the wealth of expertise of Native communities to lead the economic development process, and has proven to be the most successful way to provide opportunities and lasting prosperity shared by the entire community.

Since 2018, 18 Native CDFIs have received grants through the Bank's collaboration with the NWAF. During 2021, these organizations made 385 loans to Native Americans within



FHLB Des Moines district. As a result, more than 300 jobs were created or retained, business owner credit scores increased an average of 61 points, and many businesses were started or expanded across the district during this time. Additionally, Native CDFIs successfully provided financial education, business coaching and access to financial tools such as savings plans, credit building and college planning, to position Native businesses and entrepreneurs on the path to self-determined economic prosperity.

Of all philanthropic funding since 2006 by U.S. foundations, .04%, on average, is directed to Native communities. The collaboration between the Bank and NWAF may have been a catalyst for raising awareness among other stakeholders about opportunities for investing in organizations led by and for Native people. When comparing to prior years, significant progress was made by Native CDFIs in receiving investments of capital from national sources. For example, a large proportion of Native CDFIs participating in the collaboration between the Bank and NWAF received Rapid Response Program grants from the U.S. Treasury. Additionally, one of those recipients was selected by a local municipality to help deploy investment to the community.

Federal Reserve Bank of Minneapolis Center for Indian Country Development

In collaboration with other industry stakeholders, the Bank presented at the National Native Homeownership Coalition's Lending Systems Focus Group to discuss ways to increase lending in Indian Country, and strengthen collaborations among diverse stakeholders in support of this goal. The event was sponsored by the Federal Reserve Bank of Minneapolis Center for Indian Country Development. Bank management presented information about NAHI and the ways FHLB Des Moines members leverage these down payment funds to support Native homeownership.

#### Collaboration with a National Native CDFI

The Bank continued its ongoing collaboration with Oweesta Corporation (Oweesta), a national Native CDFI, to promote access to FHLB Des Moines capital throughout Native communities. Building on the success of a previous webinar in which the Bank and Oweesta promoted NAHI, in 2022, our organizations co-hosted a second webinar to raise awareness about the ways in which AHP is responsive to affordable housing in Native communities. Approximately 40 unique organizations attended the event. Among the attendees were member financial institutions, Native and non-Native CDFIs, Tribal organizations, housing groups, and government agencies.

#### South Dakota Native Homeownership Coalition

The Bank's long-standing engagement with the South Dakota Native Homeownership Coalition continues to grow. Throughout 2022, the Bank management remained actively engaged in meetings, which provided opportunities to deepen relationships with the Coalition whose membership includes, among other stakeholders, FHLB Des Moines member financial institutions.



At its 2022 Lender Symposium, dialogue centered around:

- Identifying strategies for lender participation in the trust land mortgage market
- Discussing considerations for government sponsored enterprises' review of conventional loan product offerings on trust land
- Fostering collaboration between direct seller/servicers and Native CDFIs to increase the flow of safe and sound mortgage loans in Indigenous communities
- Addressing uncertainties from lenders exploring market entry

#### Council for Native Hawaiian Advancement

Bank staff attended the Council of Native Hawaiian Advancement's conference in Hawaii. This convening brought together the perspectives of more than 1,700 practitioners, educators, housing providers, and business leaders who explored opportunities to advance homeownership and economic opportunities for Native Hawaiians.

#### (4) Product Promotions and Technical Assistance Resources

Throughout the year, the Bank provides its member and community partners with updates about Community Investment product availability, requirements, and other information. These promotions feature notices about events such as but not limited to the opening of the AHP online application and the quarterly release of Down Payment Product funds.

Our public website publishes carefully crafted technical assistance resources to support members' and AHP housing sponsors' detailed understanding of AHP eligibility requirements, feasibility guidelines, scoring criteria, and other features such as information about the AHP application process, the role and responsibility of the AHP sponsor and FHLB Des Moines member, resources provided in the AHP Implementation Plan, and more. Furthermore, an AHP self-scoring worksheet is provided to support users' assessment of which AHP scoring criteria may be applicable to their project.

Additionally, on an ongoing basis, the FHLB Des Moines offers on-demand technical assistance to members and housing groups, which is customized to be responsive to the particular need of a specific project or transaction and to foster community partnership.

#### Customized AHP Technical Assistance

Technical assistance for members. FHLB Des Moines staff meet with individual member institutions to explain the process for applying for AHP funds, and the member's role and responsibilities associated with the AHP application and award such as but not limited to the member's responsibilities for ensuring compliant use of funds. Additionally, Bank



staff highlight the benefits AHP offers such as opportunities for the member to expand partnerships with nonprofit organizations and to its increase affordable housing finance and targeted community lending activities.

Technical assistance for AHP sponsors. Bank staff meet with organizations interested in applying for AHP to review the application process and award responsibilities. These meetings also address the characteristics of a specific project such as its design, financials, and targeted residents, and how those characteristics will be evaluated from the perspective of AHP's scoring criteria, feasibility guidelines, and eligibility requirements. Additionally, Bank staff direct AHP sponsors to resources that assist them in building relationships with FHLB Des Moines member institutions.

#### Customized Down Payment Product Technical Assistance

Technical assistance for members. FHLB Des Moines staff meet with individual member institutions to review resources that provide an orientation about the Down Payment Products. For those interested in deploying funds, additional technical assistance is provided to educate the member about the process for reserving, disbursing, and recording retention on funds, as well as how to use the FHLB Des Moines' online system for product participation.

Technical assistance for nonprofits. FHLB Des Moines provides technical assistance for the use of Down Payment Products, explains the members' role in deploying the funds, and identifies resources to help the nonprofit select members with which to partner. Information about the Down Payment Products' retention requirements and related compatibility with other down payment assistance funds is also discussed. This guidance strengthens nonprofits' ability to partner with financial institutions and to help eligible households finance the purchase of a home.

#### (5) Raise Awareness about Community Investment Products and Build Relationships

In addition to targeted outreach to Native communities, the Bank participated in several in-person and virtual outreach events throughout our District to raise awareness about and promote access to capital provided through our Community Investment products.

Federal Deposit Insurance Corporation (FDIC) Webinar Series: Expanding Access to Homeownership

In celebration of Homeownership Month, the FDIC hosted a series of webinars to promote collaboration between financial institutions and affordable housing organizations in Missouri, North Dakota, and South Dakota. As a presenter, Bank management highlighted ways in which the Bank's Community Investment products provide our members with opportunities to finance homeownership for low- and moderate-income first-time homebuyers and for eligible Native households.



#### Montana Housing Partnership Conference

FHLB Des Moines joined HUD, USDA, and state government agencies to present information about trends that are impacting homeownership such as funding for Native projects, culturally-tailored homeownership education and purchase requirements, the impacts of COVID on the development process and households' homebuyer readiness, and other topics. The conference was attended by 392 people from 11 states.

#### Utah Housing Coalition Conference

Bank staff joined nearly 400 practitioners, funders, government agencies, and other stakeholders to discuss affordable housing needs across Utah. Examples of key themes included the importance of having flexible financing so that affordable housing projects are able to adapt to changing market dynamics such as labor shortages, increasing development costs, and constrained supply of materials.

#### Iowa Housing Conference

The state's housing conference achieved record attendance with more than 800 industry stakeholders, including Bank staff. Various affordable housing topics were discussed such as but not limited to changing market conditions, homelessness, and financial literacy.

#### Housing Oregon Industry Support Conference

The Bank joined 840 of our affordable housing colleagues in Portland for the Housing Oregon Conference. This provided the opportunity to discuss the changing housing needs in Oregon. Oregon faces many headwinds in affordable housing with specific topics discussed in the areas of homelessness and changing markets as well as opportunities to promote diversity, equity, and inclusion.

#### Idaho Rural Success Summit

Bank staff attended the first ever Idaho Rural Success Summit event, held in Twin Falls, Idaho. The conference was attended by 245 people representing Idaho cities, counties, state government agencies and other community organizations. The summit covered a myriad of issues related to rural development, including the need for affordable housing. Bank staff was able to raise awareness about the Bank's Affordable Housing Program.

#### 2022 Mortgage Conference

FHLB Des Moines hosted the 2022 Mortgage Conference in Des Moines, Iowa where Bank staff presented on the Down Payment Products Program and hosted an informational table on the Community Investment Products. The conference was attended, in person or virtually, by approximately 350 members from all 13 states in the Bank's district and Guam.



#### VII. 2023 Quantitative Targeted Community Lending Performance Goals

Refer to Attachment A for a report of progress to 2022 Performance Goals.

#### 2023 goals are:

- \$70 million in CIA originations
- Participate in and/or support 10 community lending conferences and workshops
- Promote business opportunities with existing and prospective housing associates
- Promote business opportunities with existing and prospective Community Development Financial Institution (CDFI) members



#### Appendix 1

#### **Report of Progress to 2022 Performance Goals**

As of October 31 2022

- Goal: \$50 million in CIA originations
  - o Progress: CIA originations totaled \$83.2 million
- Goal: Participate in and/or support 10 community lending conferences and workshops
  - Progress: The Bank participated in and/or supported 22 community lending conferences and workshops
- Goal: Promote business opportunities with existing and prospective housing associates
  - o Progress: Targeted outreach to eight housing associates
- Goal: Promote business opportunities with existing and prospective CDFI members
  - Progress: The Bank explored opportunities with five CDFIs, three of which are Native CDFIs



# Appendix 2 Federally recognized Tribes and Native Alaskan Villages<sup>51</sup>

Alaska	229
Native Village of Afognak (formerly the Village of Afognak)	
Agdaagux Tribe of King Cove	
Native Village of Akhiok	
Akiachak Native Community	
Akiak Native Community	
Native Village of Akutan	
Village of Alakanuk	
Alatna Village	
Native Village of Aleknagik	
Algaaciq Native Village (St. Mary's)	
Allakaket Village	
Native Village of Ambler	
Village of Anaktuvuk Pass	
Yupiit of Andreafski	
Angoon Community Association	
Village of Aniak	
Anvik Village	
Arctic Village (See Native Village of Venetie Tribal Government)	
Asa'carsarmiut Tribe	
Native Village of Atka	
Village of Atmautluak	
Atqasuk Village (Atkasook)	
Native Village of Barrow Inupiat Traditional Government	
Beaver Village	
Native Village of Belkofski	
Village of Bill Moore's Slough	
Birch Creek Tribe	
Native Village of Brevig Mission	
Native Village of Buckland	
Native Village of Cantwell	
Native Village of Chenega (aka Chanega)	
Chalkyitsik Village	
Cheesh-Na Tribe (formerly the Native Village of Chistochina)	
Village of Chefornak	
Chevak Native Village	
Chickaloon Native Village	

<sup>&</sup>lt;sup>51</sup> National Conference of State Legislatures Federal and State Recognized Tribes



Chinaile Day Tribal Courseil (forms who the Native Village of Chinaile)
Chignik Bay Tribal Council (formerly the Native Village of Chignik)
Native Village of Chignik Lagoon
Chignik Lake Village
Chilkat Indian Village (Klukwan)
Chilkoot Indian Association (Haines)
Chinik Eskimo Community (Golovin)
Native Village of Chitina
Native Village of Chuathbaluk (Russian Mission, Kuskokwim)
Chuloonawick Native Village
Circle Native Community
Village of Clarks Point
Native Village of Council
Craig Community Association
Village of Crooked Creek
Curyung Tribal Council
Native Village of Deering
Native Village of Diomede (aka Inalik)
Village of Dot Lake
Douglas Indian Association
Native Village of Eagle
Native Village of Eek
Egegik Village
Eklutna Native Village
Native Village of Ekuk
Ekwok Village
Native Village of Elim
Emmonak Village
Evansville Village (aka Bettles Field)
Native Village of Eyak (Cordova)
Native Village of False Pass
Native Village of Fort Yukon
Native Village of Gakona
Galena Village (aka Louden Village)
Native Village of Gambell
Native Village of Georgetown
Native Village of Goodnews Bay
Organized Village of Grayling (aka Holikachuk)
Gulkana Village
Native Village of Hamilton
Healy Lake Village
Holy Cross Village
Hoonah Indian Association
Native Village of Hooper Bay



Hughes Village
Huslia Village
Hydaburg Cooperative Association
Igiugig Village
Village of Iliamna
Inupiat Community of the Arctic Slope
Iqurmuit Traditional Council (formerly the Native Village of Russian Mission)
Ivanoff Bay Village
Kaguyak Village
Organized Village of Kake
Kaktovik Village (aka Barter Island)
Village of Kalskag
Village of Kaltag
Native Village of Kanatak
Native Village of Karluk
Organized Village of Kasaan
Kasigluk Traditional Elders Council (formerly the Native Village of Kasigluk)
Kenaitze Indian Tribe
Ketchikan Indian Corporation
Native Village of Kiana
King Island Native Community
King Salmon Tribe
Native Village of Kipnuk
Native Village of Kivalina
Klawock Cooperative Association
Native Village of Kluti Kaah (aka Copper Center)
Knik Tribe
Native Village of Kobuk
Kokhanok Village
Native Village of Kongiganak
Village of Kotlik
Native Village of Kotzebue
Native Village of Koyuk
Koyukuk Native Village
Organized Village of Kwethluk
Native Village of Kwigillingok
Native Village of Kwinhagak (aka Quinhagak)
Native Village of Larsen Bay
Levelock Village
Lime Village
Village of Lower Kalskag
Manley Hot Springs Village
Manokotak Village



Native Village of Marshall (aka Fortuna Ledge)
Native Village of Mary's Igloo
McGrath Native Village
Native Village of Mekoryuk
Mentasta Traditional Council
Metlakatla Indian Community, Annette Island Reserve
Native Village of Minto
Naknek Native Village
Native Village of Nanwalek (aka English Bay)
Native Village of Napaimute
Native Village of Napakiak
Native Village of Napaskiak
Native Village of Nelson Lagoon
Nenana Native Association
New Koliganek Village Council
New Stuyahok Village
Newhalen Village
Newtok Village
Native Village of Nightmute
Nikolai Village
Native Village of Nikolski
Ninilchik Village
Native Village of Noatak
Nome Eskimo Community
Nondalton Village
Noorvik Native Community
Northway Village
Native Village of Nuiqsut (aka Nooiksut)
Nulato Village
Nunakauyarmiut Tribe (formerly the Native Village of Toksook Bay)
Native Village of Nunam Iqua (formerly the Native Village of Sheldon's Point)
Native Village of Nunapitchuk
Village of Ohogamiut
Village of Old Harbor
Orutsararmuit Native Village (aka Bethel)
Oscarville Traditional Village
Native Village of Ouzinkie
Native Village of Paimiut
Pauloff Harbor Village
Pedro Bay Village
Native Village of Perryville
Petersburg Indian Association
Native Village of Pilot Point



Pilot Station Traditional Village
Native Village of Pitka's Point
Platinum Traditional Village
Native Village of Point Hope
Native Village of Point Lay
Native Village of Port Graham
Native Village of Port Heiden
Native Village of Port Lions
Portage Creek Village (aka Ohgsenakale)
Pribilof Islands Aleut Communities of St. Paul & St. George Islands
Qagan Tayagungin Tribe of Sand Point Village
Qawalangin Tribe of Unalaska
Rampart Village
Village of Red Devil
Native Village of Ruby
Saint George Island (See Pribilof Islands Aleut Communities of St. Paul & St. George Islands)
Native Village of Saint Michael
Saint Paul Island (See Pribilof Islands Aleut Communities of St. Paul & St. George Islands)
Village of Salamatoff
Native Village of Savoonga
Organized Village of Saxman
Native Village of Scammon Bay
Native Village of Selawik
Seldovia Village Tribe
Shageluk Native Village
Native Village of Shaktoolik
Native Village of Shishmaref
Native Village of Shungnak
Sitka Tribe of Alaska
Skagway Village
Village of Sleetmute
Village of Solomon
South Naknek Village
Stebbins Community Association
Native Village of Stevens
Village of Stony River
Sun'aq Tribe of Kodiak (formerly the Shoonaq' Tribe of Kodiak)
Takotna Village
Native Village of Tanacross
Native Village of Tanana
Tangirnaq Native Village (formerly Lesnoi Village)
Native Village of Tatitlek
Native Village of Tazlina



Tolida Villago	
Telida Village Native Village of Teller	
Native Village of Tellin	
Central Council of the Tlingit & Haida Indian Tribes	
Traditional Village of Togiak	
Tuluksak Native Community	
Native Village of Tuntutuliak	
Native Village of Tununak	
Twin Hills Village	
Native Village of Tyonek	
Ugashik Village	
Umkumiute Native Village	
Native Village of Unalakleet	
Native Village of Unga	
Village of Venetie (See Native Village of Venetie Tribal Government)	
Native Village of Venetie Tribal Government (Arctic Village and Village of Venetie)	
Village of Wainwright	
Native Village of Wales	
Native Village of White Mountain	
Wrangell Cooperative Association	
Yakutat Tlingit Tribe	
Idaho	4
Coeur D'Alene Tribe	
Kootenai Tribe of Idaho	
Nez Perce Tribe	
Shoshone-Bannock Tribes of the Fort Hall Reservation of Idaho	
Iowa	1
Sac & Fox Tribe of the Mississippi in Iowa	
Minnesota	8
Lower Sioux Indian Community in the State of Minnesota	
Mdewakanton Sioux Indians	
Minnesota Chippewa Tribe (Six component reservations: Bois Forte Band (Nett Lake); Fond	l du
Lac Band; Grand Portage Band; Leech Lake Band; Mille Lacs Ban; White Earth Band)	
Prairie Island Indian Community in the State of Minnesota	
Mdewakanton Sioux Indians	
Red Lake Band of Chippewa Indians	
Shakopee Mdewakanton Sioux Community of Minnesota	
Upper Sioux Community	
Missouri	0
Montana	8
Assiniboine and Sioux Tribes of the Fort Peck Indian Reservation	
Blackfeet Tribe of the Blackfeet Indian Reservation of Montana	
Chippewa-Cree Indians of the Rocky Boy's Reservation	



Confederated Salish and Kootenai Tribes of the Flathead Reservation  Crow Tribe of Montana
Fort Belknap Indian Community of the Fort Belknap Reservation of Montana
Little Shell
Northern Cheyenne Tribe of the Northern Cheyenne Indian Reservation
North Dakota 4
Spirit Lake Tribe
Standing Rock Sioux Tribe (North Dakota and South Dakota)
Three Affiliated Tribes of the Fort Berthold Reservation
Turtle Mountain Band of Chippewa Indians of North Dakota
Oregon 10
Burns Paiute Tribe
Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians of Oregon
Confederated Tribes of the Grand Ronde Community of Oregon
Confederated Tribes of the Siletz Reservation
Confederated Tribes of the Umatilla Indian Reservation
Confederated Tribes of the Warm Springs Reservation of Oregon
Coquille Indian Tribe
Cow Creek Band of Umpqua Tribe of Indians
Fort McDermitt Paiute and Shoshone Tribes of the Fort McDermitt Indian Reservation (Nevada
and Oregon)
Klamath Tribes
South Dakota 9
Cheyenne River Sioux Tribe of the Cheyenne River Reservation
Crow Creek Sioux Tribe of the Crow Creek Reservation
Flandreau Santee Sioux Tribe of South Dakota
Lower Brule Sioux Tribe of the Lower Brule Reservation
Oglala Sioux Tribe (previously listed as Oglala Sioux Tribe of the Pine Ridge Reservation)
Rosebud Sioux Tribe of the Rosebud Indian Reservation
Sisseton-Wahpeton Oyate of the Lake Traverse Reservation
Standing Rock Sioux Tribe (North Dakota and South Dakota)
Yankton Sioux Tribe of South Dakota
Utah 7
Confederated Tribes of the Goshute Reservation (Nevada and Utah)
Navajo Nation (Arizona, New Mexico and Utah)
Northwestern Band of Shoshoni Nation
Paiute Indian Tribe of Utah (Cedar Band of Paiutes, Kanosh Band of Paiutes, Koosharem Band
of Paiutes, Indian Peaks Band of Paiutes, and Shivwits Band of Paiutes)
Skull Valley Band of Goshute Indians of Utah
Ute Indian Tribe of the Uintah and Ouray Reservation
Ute Mountain Ute Tribe (Colorado, New Mexico and Utah)
Washington 29
Confederated Tribes of the Chehalis Reservation



Confederated Tribes of the Colville Reservation	
Confederated Tribes and Bands of the Yakama Nation	
Cowlitz Indian Tribe	
Hoh Indian Tribe	
Jamestown S'Klallam Tribe	
Kalispel Indian Community of the Kalispel Reservation	
Lower Elwha Tribal Community	
Lummi Tribe of the Lummi Reservation	
Makah Indian Tribe of the Makah Indian Reservation	
Muckleshoot Indian Tribe	
Nisqually Indian Tribe	
Nooksack Indian Tribe of Washington	
Port Gamble S'Klallam Tribe	
Puyallup Tribe of the Puyallup Reservation	
Quileute Tribe of the Quileute Reservation	
Quinault Indian Nation	
Samish Indian Nation	
Sauk-Suiattle Indian Tribe of Washington	
Shoalwater Bay IndianTribe of the Shoalwater Bay Indian Reservation	
Skokomish Indian Tribe	
Snoqualmie Indian Tribe	
Spokane Tribe of the Spokane Reservation	
Squaxin Island Tribe of the Squaxin Island Reservation	
Stillaguamish Tribe of Indians of Washington	
Suquamish Indian Tribe of the Port Madison Reservation	
Swinomish Indian Tribal Community	
Tulalip Tribes of Washington	
Upper Skagit Indian Tribe of Washington	
Wyoming	2
Arapaho Tribe of the Wind River Reservation	
Shoshone Tribe of the Wind River Reservation	
American Samoa	0
Guam	0
Northern Mariana Islands	0



# Appendix 3 Native Population<sup>52</sup>

	Native Population	State Population	% of State
			Population that is
			Native
Alaska	121,293	733,391	16.54
Hawaii	151,375	1,455,271	10.40
Idaho	22,304	1,839,106	1.21
Iowa	14,684	3,190,369	0.46
Minnesota	59,667	5,706,494	1.05
Missouri	32,789	6,154,913	0.53
Montana	65,431	1,084,225	6.03
North Dakota	38,219	779,094	4.91
Oregon	60,239	4,237,256	1.42
South Dakota	75,088	886,667	8.46
Utah	64,521	3,271,616	1.97
Washington	153,681	7,705,281	1.99
Wyoming	12,270	576,851	2.13
American Samoa	-	49,710	-
Guam		153,836	
Northern Mariana Islands	-	47,329	-
TOTAL	871,561	37,871,409	2.30

<sup>&</sup>lt;sup>52</sup> Decennial Census; 2020: DEC Redistricting Data (PL 94-171); Native includes American Indian, Alaska Native, Native Hawaiian and Other Pacific Islander. Total population information is available for the US Territories of Guam, American Samoa, and the Mariana Islands but demographic information is not.



# Appendix 4 Native Community Development Financial Institutions (CDFIs)<sup>53</sup>

Alaska	4
Alaska Growth Capital BIDCO, Inc.	
Cook Inlet Lending Center, Inc.	
Haa Yakaawu Financial Corporation	
Spruce Root, Inc.	
Hawaii	7
Council for Native Hawaiian Advancement	
Hawaii Central Federal Credit Union	
Hawaii Community Lending Inc	
HAWAII FIRST FCU	
Kauai Government Employees Federal Credit Union	
Lei Hoolaha	
Molokai Community Federal Credit Union	
Idaho	1
Nimiipuu Community Development Fund	
Iowa	0
Minnesota	4
Indian Land Capital Company LLC	
Leech Lake Financial Services, Inc.	
Mni Sota Fund	
White Earth Investment Initiative	
Missouri	0
Montana	4
Montana Homeownership Network	
NACDC Financial Services Inc.	
Native American Development Corporation	
Peoples Partners for Community Development	
Oregon	1
Affiliated Tribes of Northwest Indians Financial Services	
South Dakota	6
Black Hills Community Loan Fund, Inc.	
Four Bands Community Fund, Inc.	
Lakota Federal Credit Union	
Lakota Fund, Inc., The	
Mazaska Owecaso Otipi Financial, Inc	
Sisseton Wahpeton Federal Credit Union	
Washington	4
Chehalis Tribal Loan Fund	
Lummi Community Development Financial Institution	

<sup>&</sup>lt;sup>53</sup> <u>US Department of the Treasury CDFI Certification</u>, as of February 14, 2022



Northwest Native Development Fund	
Taala Fund	
Wyoming	1
Wind River Development Fund	0
American Samoa	0
Guam	0
Northern Mariana Islands	0



# Appendix 5 Tribally Designated Housing Entities<sup>54</sup>

Alaska	15
Aleutian Housing Authority	
Association of Village Council Presidents Regional Housing Authority	
Baranof Island Housing Authority	
Bering Straits Regional Housing Authority	
Bristol Bay Housing Authority	
Cook Inlet Housing Authority	
Copper River Basin Regional Housing Authority	
Interior Regional Housing Authority	
Kenaitze Salamatof TDHE	
Kodiak Island Housing Authority	
Metlakatla Housing Authority	
North Pacific Rim Housing Authority	
Northwest Inupiat Housing Authority	
Tagiugmiullu Nunamiullu Housing Authority	
Tlingit-Haida Regional Housing Authority	
Hawaii	1
Department of Hawaiian Homelands	
Idaho	4
Coeur d'Alene Tribal Housing Authority	
Kootenai Tribe Housing Department	
Nez Perce Tribal Housing Authority	
Fort Hall Housing Authority	
Iowa	1
Sac and Fox Tribal Housing Authority	
Minnesota	10
Bois Forte Housing Authority	
Fond du Lac Reservation Business Committee	
Grand Portage Housing Authority	
Leech Lake Housing Authority	
Lower Sioux Indian Housing Authority	
Mille Lacs Indian Housing Authority	
Minnesota Dakota Housing Authority	
Red Lake Reservation Housing Authority	
Upper Sioux Community Housing Authority	
White Earth Reservation Housing Authority	
Missouri	0
Montana	7

<sup>&</sup>lt;sup>54</sup> <u>US Department of Housing and Urban Development National Directory of Tribes and TDHEs by ONAP Regions</u>



Apsaalooke Tribal Housing Authority	
Fort Peck Housing Authority	
Blackfeet Housing Authority	
Chippewa Cree Housing Authority	
Salish & Kootenai Housing Authority	
Fort Belknap Housing Authority	
Northern Cheyenne Housing Authority	
North Dakota	4
Spirit Lake Housing Corporation	•
Standing Rock Housing Authority	
Fort Berthold Housing Authority	
Turtle Mountain Housing Authority	
Oregon	9
Burns Paiute Tribe Housing Department	
Coos Tribes Housing Department	
Siletz Tribe Housing Department	
Grand Ronde Tribe Housing Department	
Umatilla Tribe Housing Department	
Warm Springs Housing Authority	
Coquille Indian Housing Authority	
Cow Creek Tribe Housing Department	
Klamath Tribal Housing Department	
South Dakota	8
Cheyenne River Housing Authority	
Crow Creek Housing Authority	
Flandreau Santee Sioux Housing Authority	
Lower Brule Housing Authority	
Oglala Sioux (Lakota) Housing Authority	
Sicangu Wicoti Awayankapi Corporation (SWA)	
Sisseton Wahpeton Housing Authority	
Yankton Sioux Tribal Housing Authority	
Utah	3
Goshute Housing Authority	
Utah Paiute Housing Authority	
Ute Indian Tribally Designated Housing Entity	
Washington	29
Yakama Nation Housing Authority	
Chehalis Tribal Housing Authority	
Colville Indian Housing Authority	
Cowlitz Indian Tribal Housing	
Hoh Indian Tribe Housing Department	
Jamestown S'Klallam Tribe Housing Department	
Kalispel Tribe Housing Department	



Lower Elwha Housing Authority	
Lummi Nation Housing Authority	
Makah Tribe Housing Department	
Muckleshoot Housing Authority	
Nisqually Tribe Housing Department	
Nooksack Tribe Housing Department	
Port Gamble S'Klallam Housing Authority	
Puyallup Tribe Housing Department	
Quileute Housing Authority	
Quinault Housing Authority	
Samish Tribe Housing Department	
Sauk-Suiattle Tribe Housing Department	
Shoalwater Bay Tribe Housing Department	
Skokomish Tribe Housing Department	
Snoqualmie Tribe Housing Department	
Spokane Indian Housing Authority	
Squaxin Island Tribe Housing Department	
Stillaguamish Tribe Housing Department	
Suquamish Tribe Housing Department	
Swinomish Housing Authority	
Tulalip Tribes Housing Department	
Upper Skagit Tribe Housing Department	
Wyoming	2
Eastern Shoshone Housing Authority	
Northern Arapaho Housing Authority	
American Samoa	0
Guam	0
Northern Mariana Islands	0