

State of North Dakota

**2020 Analysis of
Impediments to
Fair Housing
Choice**

2020 STATE OF NORTH DAKOTA ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



Prepared for the:
North Dakota Department of Commerce

Prepared by:
Western Economic Services, LLC
212 SE 18th Avenue
Portland, OR 97214
Phone: (503) 239-9091
Toll Free: (866) 937-9437
Fax: (503) 239-0236

Website: <http://www.westernes.com>

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Has Your Right to Fair Housing Been Violated?

If you feel you have experienced discrimination in the housing industry, please contact:

The United States Department of Housing and Urban Development

Office of Fair Housing and Equal Opportunity

Department of Housing and Urban Development

451 Seventh Street SW, Room 5204

Washington, DC 20410-2000

Telephone: (202) 708-1112

Toll Free: (800) 669-9777

Website: <http://www.HUD.gov/offices/fheo/online-complaint.cfm>

Denver Regional Office of FHEO

Department of Housing and Urban Development

1670 Broadway

Denver, Colorado 80202-4801

Telephone: (303) 672-5437

Toll Free: (800) 877-7353

TTY: (303) 672-5248

Website: <http://www.HUD.gov>

North Dakota Department of Labor and Human Rights

600 East Boulevard Avenue, Department 406

Bismarck, North Dakota 58505-0340

Telephone: (701) 328-2660

Toll Free: 1(800) 582-8032

TTY: 1(800) 366-6888 or 1(800) 366-6889 (Relay ND)

Fax: (701) 328-2031

Website: labor@nd.gov or humanrights@nd.gov

High Plains Fair Housing Center

P.O. Box 5222

Grand Forks, North Dakota 58206

Telephone: (701) 203-1077

Toll Free: 1(866) 380-2738

Website: highplainsfairhousing@gmail.com

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Section I. Executive Summary

Overview

Title VIII of the 1968 Civil Rights Act, also known as the Fair Housing Act, protects people from discrimination based on race, color, national origin, religion, sex, familial status, and disability when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing related activities. The Act, and subsequent laws reaffirming its principles, seeks to overcome the legacy of segregation, unequal treatment, and historic lack of access to housing opportunity. There are several statutes, regulations, and executive orders that apply to fair housing, including the Fair Housing Act, the Housing Amendments Act, and the Americans with Disabilities Act.¹

Affirmatively furthering fair housing is defined in the Fair Housing Act as taking “meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics”.² Specifically, affirmatively furthering fair housing requires that recipients of federal housing and urban development funds take meaningful actions to address housing disparities, including replacing segregated living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.³ Furthering fair housing can involve developing affordable housing, removing barriers to affordable housing development in high opportunity areas, investing in neighborhood revitalization, preserving and rehabilitating existing affordable housing units, improving housing access in areas of concentrated poverty, and improving community assets.

Assessing Fair Housing

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development’s (HUD’s) housing and community development programs. These provisions come from Section 808(e)(5) of the Fair Housing Act, which requires that the Secretary of HUD administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.⁴

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As a part of the consolidated planning process, and entitlement communities that receive such funds from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH).

In July of 2015, HUD released a new AFFH rule which provided a format, a review process, and content requirements for the newly named “Assessment of Fair Housing”, or AFH.⁵ The assessment

¹ https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_and_related_law

² § 5.152 Affirmatively Furthering Fair Housing

³ § 5.152 Affirmatively Furthering Fair Housing

⁴ 42 U.S.C.3601 et seq.

⁵ 80 FR 42271. <https://www.federalregister.gov/documents/2015/07/16/2015-17032/affirmatively-furthering-fair-housing>

would now include an evaluation of equity, the distribution of community assets, and access to opportunity within the community, particularly as it relates to concentrations of poverty among minority racial and ethnic populations. Areas of opportunity are physical places within communities that provide things one needs to thrive, including quality employment, high performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes.

The AFH includes measures of segregation and integration, while also providing some historical context about how such concentrations became part of the community's legacy. Together, these considerations were intended to better inform public investment decisions that would lead to amelioration or elimination of segregation, enhance access to opportunity, promote equity, and hence, housing choice. Equitable development requires thinking about equity impacts at the front end, prior to the investment occurring. That thinking involves analysis of economic, demographic, and market data to evaluate current issues for citizens who may have previously been marginalized from the community planning process. All this would be completed by using an on-line Assessment Tool.

However, on January 5, 2018, HUD issued a notice that extended the deadline for submission of an AFH by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020.⁶ Then, on May 18, 2018, HUD released three notices regarding the AFFH; one eliminated the January 5, 2018, guidance; a second withdrew the on-line Assessment Tool for local government program participants; and, the third noted that the AFFH certification remains in place. HUD went on to say that the AFFH databases and the AFFH Assessment Tool guide would remain available for the AI; and, encouraged jurisdictions to use them, if so desired.

Hence, the AI process involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, housing transactions, locations of public housing authorities, areas having racial and ethnic concentrations of poverty and access to opportunity. The development of an AI also includes public input, 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 fair housing issues and impediments.

In accordance with the applicable statutes and regulations governing the Consolidated Plan, the North Dakota Department of Commerce certifies that they will affirmatively further fair housing, by taking appropriate actions to overcome the effects of any impediments identified in the Analysis of Impediments to Fair Housing Choice and maintaining records that reflect the analysis and actions taken in this regard.

Socio-Economic Context

While the population in the State of North Dakota is growing, the racial and ethnic makeup of the area is not changing significantly. There are areas in the State, however, that do see high concentrations of Native American and Hispanic residents. Limited English Proficiency includes an estimated 0.5 percent or 3,286 people of the population speaks Spanish at home, followed by 0.3 percent or 2,220 people speaking Other Indo-European languages. In 2018, some 93.2 percent of households had a high school education or greater, including 26.9 percent with a high school

⁶ 83 FR 683 (January 5, 2018)

diploma or equivalent, 38.6 percent with some college, 20.1 percent with a Bachelor's Degree, and 6.8 percent with a graduate or professional degree.

In 2018, unemployment in the State was at 2.6 percent. This is representative of a labor force of 404,299 people and 393,755 people employed. Real per capita income has stagnated the last few years. However, poverty has declined to 10.9 percent, representing 79,270 persons living in poverty in the State.

The State experienced an increase in housing production beginning in 2012. In 2018, there were 3,211 total units produced in the study area, with 1,241 of these being multi-family units. The value of single-family permits, however, has continued to rise, reaching \$242,696 in 2018. Since 2010, the study area has seen an increase in the proportion of vacant units.

Overview of Findings

As a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback, the North Dakota Department of Commerce has identified a series of fair housing issues/impediments, and other contributing factors that contribute to the creation or persistence of those issues.

Table I.1, on the following page, provides a list of the contributing factors that have been identified as causing these fair housing issues/impediments and prioritizes them according to the following criteria:

1. High: Factors that have a direct and substantial impact on fair housing choice.
2. Medium: Factors that have a less direct impact on fair housing choice, or that the North Dakota Department of Commerce has limited authority to mandate change.
3. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that the North Dakota Department of Commerce has limited capacity to address.

Table I.1 Contributing Factors State of North Dakota		
Contributing Factors	Priority	Justification
Moderate to high levels of segregation	High	In 2017, black, American Indian, Native Hawaiian, and “other” race, households had a moderate to high level of segregation, according to the Dissimilarity Index.
Access to low poverty areas and concentrations of poverty	High	Low poverty index is markedly lower for Native American populations than white school proficiency, indicating inequitable access to low poverty areas.
Access to labor market engagement	Med	Native American households have less access to labor market engagement as indicated by the Access to Opportunity index. However, the State has little control over impacting labor market engagement on a large scale.
Access to School Proficiency	Med	Native American households have lower levels of access to proficient schools.
Insufficient affordable housing in a range of unit sizes	High	Some 19.6 percent of households have cost burdens. This is more significant for renter households, of which 35.7 percent have cost burdens. In addition, 70.9 percent of households below 30 percent HAMFI have cost burdens. This signifies a lack of housing options that are affordable to a large proportion of the population.
Black, American Indian, and Hispanic households have disproportionate rates of housing problems	High	Black, American Indian, and Hispanic households face a disproportionate rate of housing problems at rates of 50.7 percent, 35.0 percent, and 40.6 percent, respectively. This is compared to the State average of 22.0 percent.
Discriminatory patterns in Lending	Med	The mortgage denial rates for black, Native American, and Hispanic households are higher than the jurisdiction average according to 2008-2018 HMDA data.
Insufficient accessible affordable housing	High	The number of accessible affordable units may not meet the need of the growing elderly and disabled population, particularly as the population continues to age. Some 46.7 percent of persons aged 75 and older have at least one form of disability.
Discrimination on the basis of disability	High	Fair housing complaint data and fair housing testing results found disability to be the number one basis for discrimination in the State.
Lack of fair housing infrastructure	High	The fair housing survey and public input indicated a lack of collaboration among agencies to support fair housing.
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education.
Insufficient understanding of credit	High	The fair housing survey and public input indicated an insufficient understanding of credit needed to access mortgages.

FAIR HOUSING ISSUES, CONTRIBUTING FACTORS, AND PROPOSED ACHIEVEMENTS

Table I.2 summarizes the fair housing issues/impediments and contributing factors, including metrics, milestones, and a timeframe for achievements.

Table I.2

Fair Housing Goal	Impediments to Fair Housing Choice/ Contributing Factors	Fair Housing Issue	Recommended Actions
Promote affordable housing development in high opportunity areas	<p>Moderate to high levels of segregation</p> <p>Access to low poverty areas</p> <p>Insufficient affordable housing in a range of unit sizes</p> <p>Black, American Indian, and Hispanic households have disproportionate rates of housing problems</p> <p>Discriminatory patterns in Lending</p>	<p>Segregation</p> <p>R/ECAPs</p> <p>Disproportionate Housing Need</p>	<p>Continue to promote homeownership and affordable rental opportunities in high opportunity areas with the use of CDBG, HOME, and HTF funds. Over the next five (5) years:</p> <p>150 rental units added 500 rental units rehabilitated 150 homeowner housing units rehabilitated 100 households down payment and closing cost assistance for first-time homebuyers</p> <p>Track activities annually in the State's PER.</p>
Promote community and service provider knowledge of ADA laws	<p>Insufficient accessible affordable housing</p> <p>Discrimination on the basis of disability</p>	<p>Disability and Access</p>	<p>Continue to partner with the HPFHC to conduct tests on selected newly constructed housing units and apartment complexes. Record activities annually in the State's PER.</p> <p>Continue to partner with the HPFHC, DOLHR, and 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. Record activities annually in the State's PER.</p>
Enhance community services in R/ECAPs	<p>Access to low poverty areas</p> <p>Access to job proximity</p> <p>Access to school proficiency</p>	<p>Disparities in Access to Opportunity</p>	<p>Encourage increased public services and public investment in high poverty areas in the State. Record activities annually in the State's PER.</p>
Increase fair housing outreach and education in the State	<p>Moderate to high levels of segregation</p> <p>Access to low poverty areas and concentrations of poverty</p> <p>Discriminatory patterns in Lending</p>	<p>Fair Housing Enforcement and Outreach</p>	<p>Continue to partner with the High Plains Fair Housing Center (HPFHC), North Dakota Department of Labor and Human Rights (DOLHR), and other non-profit organizations to conduct outreach and education to professionals in the housing industry. Record activities annually in the State's PER.</p> <p>Enhance outreach and education to units of local government, as well as housing consumers, as it relates to affirmatively furthering fair housing and the duty to affirmatively further fair housing. Record activities annually in the State's PER.</p> <p>Conduct outreach and education of prospective housing consumers, 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. Record activities annually in the State's PER.</p>

Section II. Community Participation Process

The following section describes the community participation process undertaken for the 2020 State of North Dakota Analysis of Impediments to Fair Housing Choice.

A. OVERVIEW

The outreach process included the Fair Housing Survey, Fair Housing Forums, and a public review meeting.

The Fair Housing Survey was distributed as an internet outreach survey, as well as being made available as a printed version. As of the date of this document, 65 responses have been received.

The Fair Housing Forum was held on February 24, 2020.

The Draft for Public Review AI was made available on April 6, 2020 and a 30-day public input period was initiated.

A public hearing was held during the public review period in order to gather feedback and input on the draft Analysis of Impediments. After the close of the public review period and inspection of comments received, the final draft was made available in May 2020.

B. THE FAIR HOUSING SURVEY

The purpose of the survey, a relatively qualitative component of the AI, was to gather insight into knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Many individuals and organizations throughout the State of North Dakota invited to participate. At the date of this document, some 65 responses were received. A complete set of survey responses can be found in **Section IV.I Fair Housing Survey Results**.

C. FAIR HOUSING FORUM

The Fair Housing Forum was held on February 24, 2020. The complete transcripts from this meeting is included in the Appendix.

D. THE FINAL PUBLIC REVIEW PROCESS

A 30-day public review process was held from April 6, 2020 through May 6, 2020. It included a public review meeting during this period on April 21, 2020. A summary of the comments received during this meeting will be included below. The complete transcript from this meeting will be included in the Appendix.

Section III. Assessment of Past Goals and Actions

An Analysis of Impediments to Fair Housing Choice for the State of North Dakota was last completed in 2015. The conclusions drawn from this report are outlined in the following narrative.

A. PAST IMPEDIMENTS AND ACTIONS

The conclusions of the 2015 Analysis of Impediments are included below:

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), and in consultation with the High Plains Fair Housing Center. 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. In addition, a representative of the High Plains Fair Housing Center noted that the complaints that the organizations receives reveal “continuing evidence of discrimination, particularly against persons with disabilities, Native Americans, New Americans, and families with children.”

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, and in consultation with the High Plains Fair Housing Center. 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.

Finally, a representative of the High Plains Fair Housing Center noted that legal requirements pertaining to design and construction are not well understood, and that "requests for reasonable accommodation are frequently resisted."⁷

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.

⁷ Margaret Moore Jackson, High Plains Fair Housing Center (personal communication April 24, 2015). See Appendix E.

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 Center 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 Center 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.

FAIR HOUSING ACTIVITIES

The State's Activities, as described by their 2018 Performance and Evaluation Report (PER) is described below.

The State of North Dakota, specifically the North Dakota Department of Labor and Human Rights, will continue to insure the enforcement of the fair housing law and provide fair housing education and outreach in cities throughout the state by utilizing promotional items such as fair housing and human rights brochures. The items provide specific information on what fair housing is, the law, and how the Department of Labor and Human Rights handles specific housing complaints. They also provide an overview of the Department of Labor and Human Rights' relationship with HUD and how the state's laws are substantially equivalent to the Federal Fair Housing Law.

In addition, the North Dakota Department of Commerce has partnered with High Plains Fair Housing Center. The Center assists people who believe they have experienced discrimination while attempting to rent or purchase housing, provides community education to promote fair housing, and conducts preliminary investigations of potential housing discrimination. High Plains conducts testing throughout the state to seek out instances of discrimination. High Plains targets training and follow up testing to ensure that there are no further instances of discrimination. Moreover, High Plains reviews policies and practices in the state of North Dakota to identify instances of discrimination particularly in the area of disparate impact-such as translation barriers.

High Plains Fair Housing Center (HPFHC) conducted training events and meetings throughout the state to educate professionals, consumers, general audiences, healthcare providers, lawyers, and local governments on discrimination in the housing industry.

Some of these educational activities included the following topics: housing discrimination based on race, color, religion, national origin, sex, legal prohibitions on discrimination against families with children or persons with disabilities, receipt of public assistance discrimination, fair lending practices, fair housing in real estate, and tester training. Between the dates of July 1, 2018 – June 30, 2019, HPFHC had 99 training events and meetings that were used to educate North Dakotans about fair housing rights and responsibilities to reach a total of 1,775 consumers, housing providers, government officials, lawyers, social workers, and advocates.

HPFHC conducted 53 fair housing training events with 1,347 persons in attendance and conducted 46 meetings to discuss fair housing issues in North Dakota.

High Plains Fair Housing Center (HPFHC) also conducted follow up testing throughout the state to identify housing discrimination. In addition to rental testing and design & construction testing, HPFHC now conducts lending and sales testing. Testing between July 1, 2018 and June 30th, 2019 took place in 12 cities across North Dakota. Classes tested included national origin, familial status, disability, race, and receipt of public assistance for rental testing. Lending testing included race, familial status, and national origin. Sales testing included familial status, national origin, sex, and disability. Testing took place in the following cities: Grand Forks, Fargo, Bismarck, Minot, Cavalier, Jamestown, Watford City, Williston, Rugby, Casselton, Mapleton, and Mandan.

The DCS has also partnered with the Native American Development Corporation (NADC) to help overcome identified financial barriers low to moderate income Native Americans across North Dakota with a primary focus on the Bismarck metropolitan area thus far. These financial services included consumer financial counseling. In FY2018, NADC conducted 35 financial counseling sessions by clients who seek homeless assistance services and whom are referred to us by another

program called, “Free Through Recovery” (FTR), a contracted with North Dakota Human Services Department. FTR provides peer support services to adult inmates awaiting trial or being released from prison and/or jails and the homeless whom are in an economic transition. Furthermore, NADC provided two (2) workshops this past year both face to face and via webinar platform utilizing a “zoom” application. With the new full time hire of a consumer finance counselor in December 2018, NADC had increased its capacity to provide workshops and consumer economic services. Upcoming webinars and workshops scheduled for FY2019 are: (1) homebuyer workshop (2) how to improve credit score workshop (3) how to build your credit workshop (4) how to sustain rental housing. The new additional counseling services begin in September 2019 and are as follows: (1) building financial skills for Native families (2) financial coaching (3) homeownership counseling and (4) HUD Housing Counseling. These trainings have been completed by our consumer finance counselor and paid for by the Northwest Area Foundation and the U.S. Department of Treasury. NADC has a federal grant award from the U.S. Department of Treasury’s Native Community Development Financial Institution (Native CDFI) Fund that allows NADC to hire a full-time Loan Officer. This Loan Officer will begin lending in late September 2019 when the loan capital is anticipated. NADC will launch two loan products: consumer loans and microenterprise loans. Loan capital is anticipated to be received by USDA this winter of 2019. NADC’s servicing capacity has become ready to provide loans and financial counseling.

Section IV. Fair Housing Analysis

This section presents demographic, economic, and housing information that is drawn from the 2010 Census and American Community Survey (ACS) estimates unless otherwise noted. This analysis uses ACS Data to analyze a broad range of socio-economic characteristics, including population growth, race, ethnicity, disability, employment, poverty, and housing trends; these data are also available by Census tract, and are shown in geographic maps. Ultimately, the information presented in this section illustrates the underlying conditions that shape housing market behavior and housing choice in the State of North Dakota.

Lead Agency and Service Area

The North Dakota Department of Commerce is the lead agency undertaking this Analysis of Impediments to Fair Housing Choice.

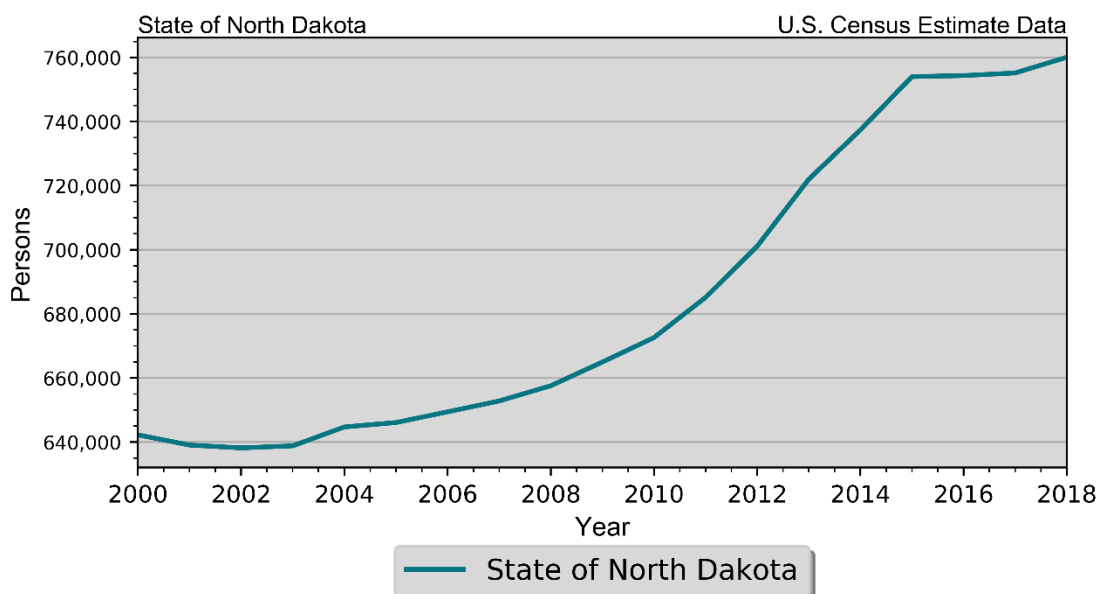
A. SOCIO-ECONOMIC OVERVIEW

Demographics

The Census Bureau’s current census estimates for each year since the 2010 Census are presented in Table IV.1. The 2018 estimates indicate that the State of North Dakota’s population increased from 672,591 in 2010 to 760,077 in 2018, or by 13 percent. The 2018 population estimate is not yet available broken down by race, age, or gender. For those purposes, we will use the 2018 Five-year ACS estimates. Population trends for State of North Dakota since 2000 are displayed below in Diagram IV.1.

Table IV.1 Population Estimates State of North Dakota 2010-2018 Census Data and Intercensal Estimates	
2010 Census	672,591
2011 Population Estimate	685,136
2012 Population Estimate	701,116
2013 Population Estimate	721,999
2014 Population Estimate	737,382
2015 Population Estimate	754,022
2016 Population Estimate	754,353
2017 Population Estimate	755,176
2018 Population Estimate	760,077

**Diagram IV.1
Population**
State of North Dakota



Population Estimates

The Census Bureau's current estimates indicate that State of North Dakota's population increased from 672,591 in 2010 to 760,077 in 2018, or by 13.0 percent. The number of people from 25 to 34 years of age increased by 26.9 percent, and the number of people from 55 to 64 years of age increased by 15.9 percent.

Between 2010 and 2018, the percent change in the State of North Dakota population by race was white with 8.6 percent, black with 210.6 percent, American Indian and Alaskan Natives with 13.6 percent, Asian with 90.9 percent, Native Hawaiian or Pacific Islanders with 71.6 percent, two or more races with 55.6 percent, and Hispanic or Latino with 119.3 percent. These data are presented in Table IV.2.

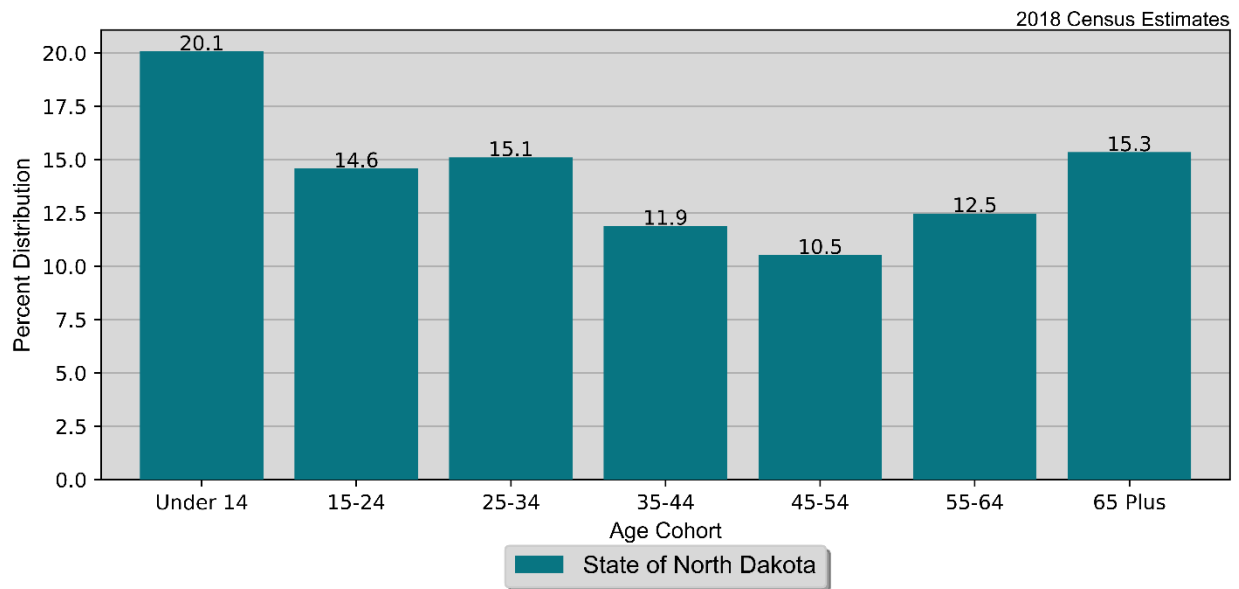
Table IV.2			
Profile of Population Characteristics			
State of North Dakota vs. State of North Dakota 2010 Census and 2018 Current Census Estimates			
Subject	State of North Dakota		
	2010 Census	Jul-18	% Change
Population	672,591	760,077	13.0%
Age			
Under 14 years	124,461	152,549	22.6%
15 to 24 years	106,430	110,861	4.2%
25 to 34 years	90,485	114,800	26.9%
35 to 44 years	75,262	90,402	20.1%
45 to 54 years	96,657	80,005	-17.2%
55 to 64 years	81,819	94,823	15.9%
65 and Over	97,477	116,637	19.7%
Race			
White	609,136	661,549	8.6%
Black	8,248	25,620	210.6%
American Indian and Alaskan Native	36,948	41,962	13.6%
Asian	7,032	13,426	90.9%
Native Hawaiian or Pacific Islander	334	573	71.6%
Two or more races	10,893	16,947	55.6%
Ethnicity (of any race)			
Hispanic or Latino	13,467	29,529	119.3%

Table IV.3 presents the population of the State of North Dakota by age and gender from the 2010 Census and 2018 current census estimates. The 2010 Census count showed a total of 339,864 males, who accounted for 50.5 percent of the population, and the remaining 49.5 percent, or 332,727 persons, were female. In 2018, the number of males rose to 389,350 persons, and accounted for 51.2 percent of the population, with the remaining 48.8 percent, or 370,727 persons being female.

Table IV.3 Population by Age and Gender State of North Dakota 2010 Census and Current Census Estimates							
Age	2010 Census			2018 Current Census Estimates			% Change 10-18
	Male	Female	Total	Male	Female	Total	
Under 14 years	63,702	60,759	124,461	78,012	74,537	152,549	22.6%
15 to 24 years	56,156	50,274	106,430	58,233	52,628	110,861	4.2%
25 to 44 years	48,052	42,433	90,485	62,423	52,377	114,800	26.9%
45 to 54 years	38,826	36,436	75,262	48,016	42,386	90,402	20.1%
55 to 64 years	48,767	47,890	96,657	41,137	38,868	80,005	-17.2%
65 and Over	41,934	39,885	81,819	47,869	46,954	94,823	15.9%
Total	339,864	332,727	672,591	389,350	370,727	760,077	13.0%
% of Total	50.5%	49.5%	.	51.2%	48.8%	.	

Diagram IV.2 displays the percentage of the population by age in State of North Dakota.

Diagram IV.2
Age Cohorts
State of North Dakota



Census Demographic Data

Census data is presented in one of four Summary Files (SF). In the 1980, 1990, and 2000 decennial censuses, the Census Bureau released the full SF1 100 percent count data⁸, along with additional tabulations including the one-in-six SF3 sample. The Census Bureau did not collect additional sample data such as the SF3 in the 2010 decennial census, so many important housing and income concepts are not available in the 2010 Census.

To study these important housing and income concepts, the Census Bureau distributes the American Community Survey (ACS) every year to a sample of the population, then quantifies the

results as one-, three- and five-year averages. The one-year sample only includes responses from the year the survey was implemented, while the five-year sample includes responses over a five-year period. The five-year estimates are more robust than the one or three year samples because they include more responses and can be tabulated down to the Census tract level.

The Census Bureau collects race data according to U.S. Office of Management and Budget guidelines, and these data are based on self-identification. Ancestry refers to one's ethnic origin or descent, "roots," or heritage, or the place of birth of the person or the person's parents or ancestors before their arrival in the United States. Ethnic identities may or may not represent geographic areas. People may choose to report more than one race group and people of any race may be of any ethnic origin. Hispanic origin can be viewed as the heritage, nationality, lineage, or country of birth of the person or the person's parents or ancestors before arriving in the United States. People who identify as Hispanic, Latino, or Spanish may be any race.

The State of North Dakota population by race and ethnicity is shown in Table IV.4. The white population increased by 8.6 percent, representing 87.1 percent of the population in 2018, compared with the black population, which increased by 210.6 percent and accounted for 2.7 percent of the population. The Hispanic population represented 3.5 percent of the population, which increased from 13,467 to 29,529 people between 2010 and 2018, or by 119.3 percent.

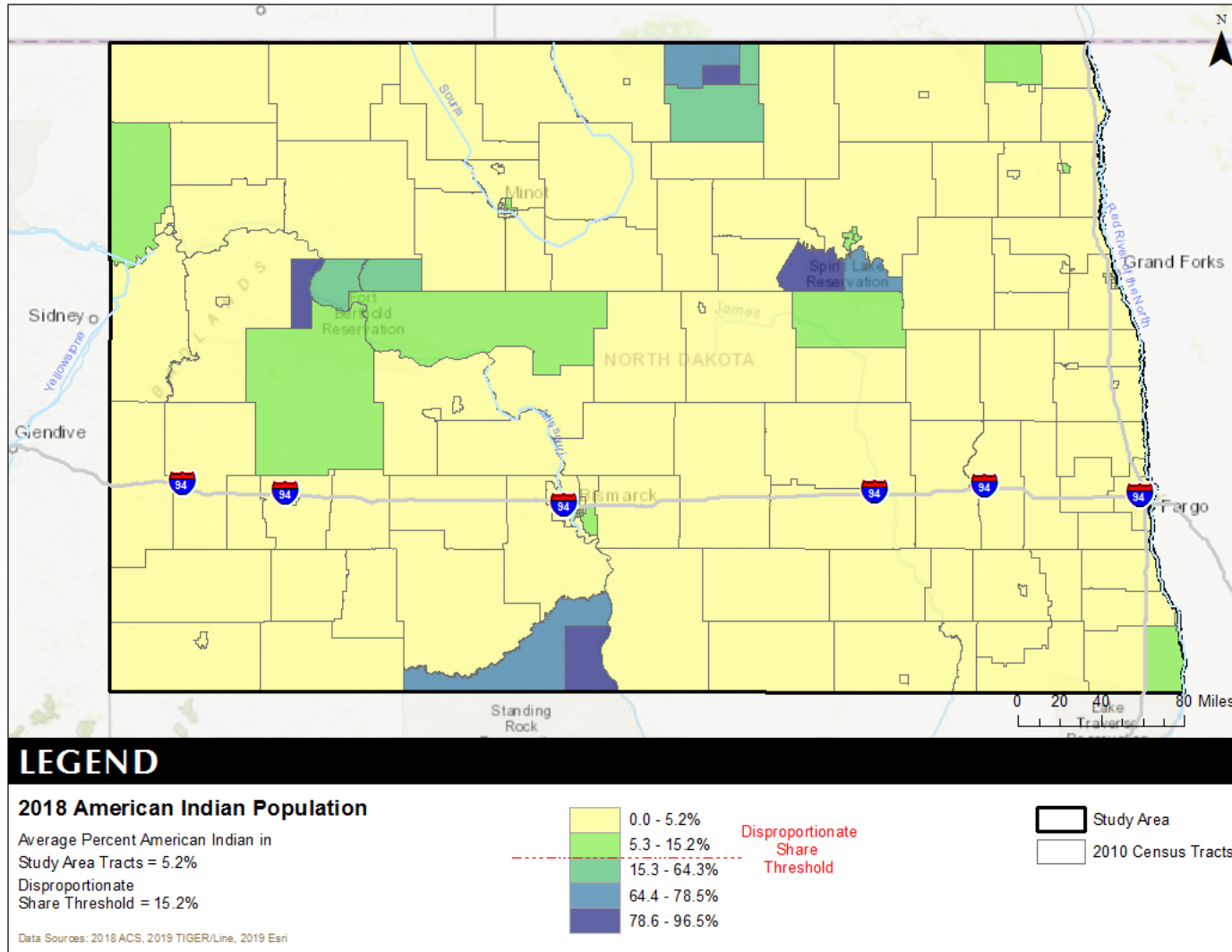
Table IV.4				
Population by Race and Ethnicity				
State of North Dakota				
2010 Census & 2018 Five-Year ACS				
Race	2010 Census		2018 Five-Year ACS	
	Population	% of Total	Population	% of Total
White	605,449	90.0%	655,268	87.1%
Black	7,960	1.2%	20,445	2.7%
American Indian	36,591	5.4%	39,462	5.2%
Asian	6,909	1.0%	10,814	1.4%
Native Hawaiian/ Pacific Islander	320	0%	378	0.1%
Other	3,509	0.5%	7,528	1.0%
Two or More Races	11,853	1.8%	18,306	2.4%
Total	672,591	100.0%	752,201	100.0%
Non-Hispanic	659,124	98.0%	725,672	96.5%
Hispanic	13,467	2.0%	26,529	3.5%

The change in race and ethnicity between 2010 and 2018 is shown in Table IV.5. During this time, the total non-Hispanic population was 725,672 persons in 2018. The Hispanic population was 26,529.

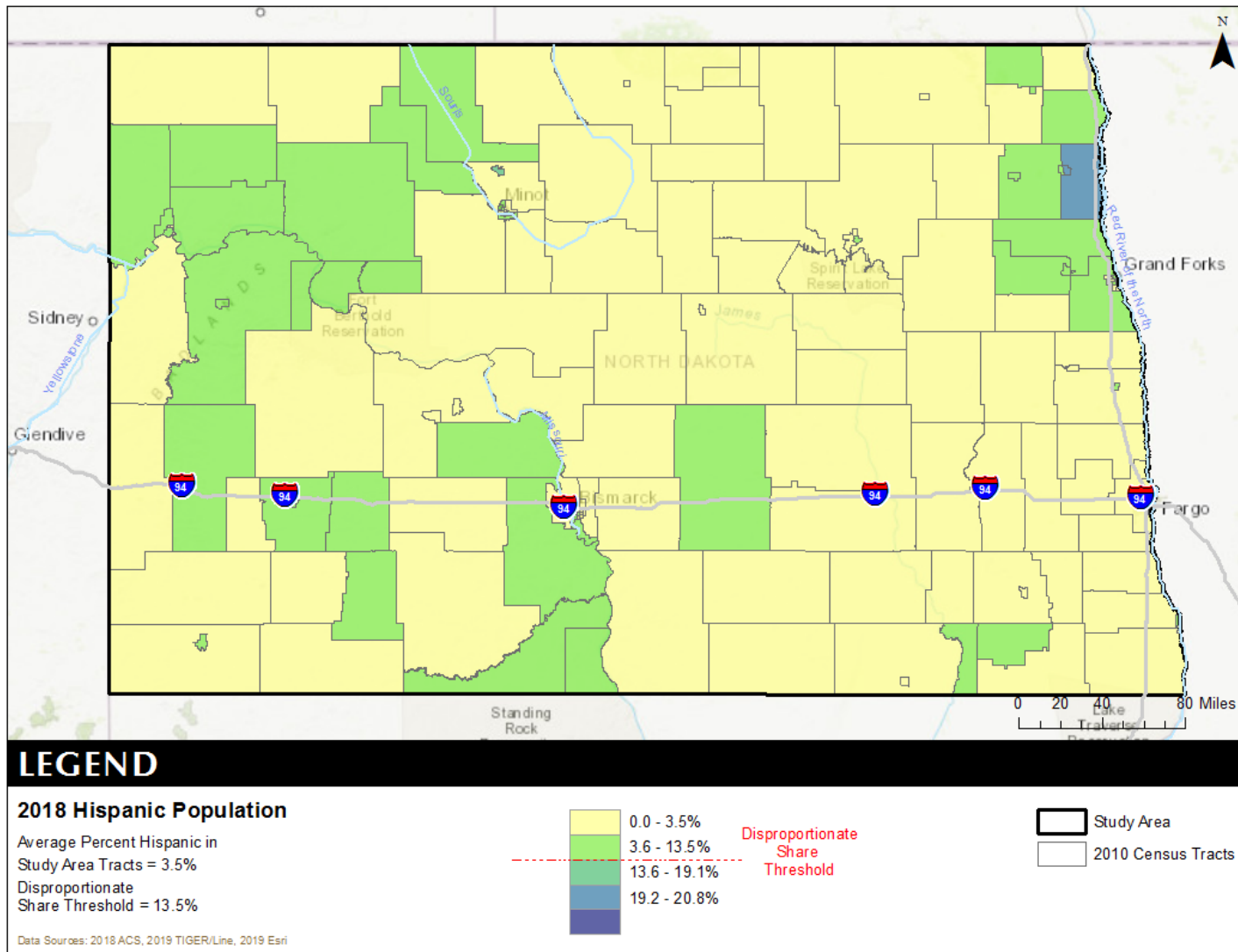
Table IV.5				
Population by Race and Ethnicity				
State of North Dakota				
2010 Census & 2018 Five-Year ACS				
Race	2010 Census		2018 Five-Year ACS	
	Population	% of Total	Population	% of Total
Non-Hispanic				
White	598,007	90.7%	639,477	88.1%
Black	7,720	1.2%	20,113	2.8%
American Indian	35,562	5.4%	38,308	5.3%
Asian	6,839	1.0%	10,664	1.5%
Native Hawaiian/ Pacific Islander	290	0%	366	0.1%
Other	341	0.1%	972	0.1%
Two or More Races	10,365	1.6%	15,772	2.2%
Total Non-Hispanic	659,124	100.0%	725,672	100.0%
Hispanic				
White	7,442	55.3%	15,791	59.5%
Black	240	1.8%	332	1.3%
American Indian	1,029	7.6%	1,154	4.3%
Asian	70	0.5%	150	0.6%
Native Hawaiian/ Pacific Islander	30	0.2%	12	0%
Other	3,168	23.5%	6,556	24.7%
Two or More Races	1,488	11.0%	2,534	9.6%
Total Hispanic	13,467	100.0	26,529	100.0%
Total Population	672,591	100.0%	752,201	100.0%

The maps on the following pages show the geographic distribution of racial and ethnic groups in the State of North Dakota. These maps are used to determine if there are any areas in the State that have a disproportionate share of racial or ethnic groups. A disproportionate share exists if any one racial or ethnic group is concentrated in an area at a rate of ten percentage points or more than the average for the State. As seen in Map IV.1, American Indian households are disproportionately concentrated in certain areas in the central parts of the State. These tend to be areas in and adjacent to Native American reservations. Map IV.2 show the distribution of Hispanic households. Hispanic households are seen a disproportionate rate in the western part of the State in 2018.

Map IV.1
American Indian Population
 State of North Dakota
 2018 ACS, Tigerline



Map IV.2
Hispanic Population
 State of North Dakota
 2018 ACS, Tigerline



Group Quarters Population

The group quarters population includes the institutionalized population, who live in correctional institutions, juvenile facilities, nursing homes, and other institutions, and the non-institutionalized population, who live in college dormitories, military quarters, and other group living situations. As seen in Table IV.6, between 2000 and 2010, the institutionalized population changed -0.1 percent in State of North Dakota, from 9,688 people in 2000 to 9,675 in 2010. The non-institutionalized population changed 10.3%, from 13,943 in 2000 to 15,381 in 2010.

Table IV.6					
Group Quarters Population					
State 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	1,518	15.7%	2,489	25.7%	64.0%
Juvenile Facilities	.	.	383	4.0%	.
Nursing Homes	7,254	74.9%	6,433	66.5%	-11.3%
Other Institutions	916	9.5%	370	3.8%	-59.6%
Total	9,688	100.0%	9,675	100.0%	-0.1%
Non-institutionalized					
College Dormitories	10,137	72.7%	10,570	68.7%	4.3%
Military Quarters	1,244	8.9%	1,380	9.0%	10.9%
Other Non-institutionalized	2,562	18.4%	3,431	22.3%	33.9%
Total	13,943	100.0%	15,381	100.0%	10.3%
Group Quarters Population	23,631	100.0%	25,056	100.0%	6.0%

Foreign Born and Limited English Proficiency Populations

Under Title VI of the Civil Rights Act of 1964 and in accordance with Supreme Court precedent in *Lau v. Nichols*, recipients of federal financial assistance are required to take reasonable steps to ensure meaningful access to their programs and activities by Limited English proficient (LEP) persons.⁹ In the context of HUD's assessment of access to housing, LEP refers to a person's limited ability to read, write, speak, or understand English.¹⁰

The number of foreign-born persons is shown in Table IV.7. An estimated 0.3 percent of the population was born in Canada, some 0.3 percent were born in Mexico, and another 0.3 percent were born in Philippines.

⁹ https://www.hud.gov/program_offices/fair_housing_equal_opp/limited_english_proficiency_0

¹⁰ <https://www.hud.gov/sites/documents/LEPMEMO091516.PDF>

Table IV.7 Place of Birth for the Foreign-Born Population State of North Dakota 2018 Five-Year ACS			
Number	County	Number of Person	Percent of Total Population
#1 country of origin	Canada	2,629	0.3%
#2 country of origin	Mexico	2,397	0.3%
#3 country of origin	Philippines	2,074	0.3%
#4 country of origin	Liberia	1,366	0.2%
#5 country of origin	India	1,363	0.2%
#6 country of origin	China excluding Hong Kong and Taiwan	1,240	0.2%
#7 country of origin	Other South Central Asia	1,089	0.1%
#8 country of origin	Somalia	1,035	0.1%
#9 country of origin	Nepal	995	0.1%
#10 country of origin	Other Eastern Africa	930	0.1%

The language spoken at home for those with Limited English Proficiency are shown in Table IV.8. An estimated 0.5 percent or 3,286 people of the population speaks Spanish at home, followed by 0.3 percent or 2,220 people speaking Other Indo-European languages.

Table IV.8 Limited English Proficiency and Language Spoken at Home State of North Dakota 2018 Five-Year ACS			
Number	County	Number of Person	Percent of Total Population
#1 LEP Language	Spanish	3,286	0.5%
#2 LEP Language	Other Indo-European languages	2,220	0.3%
#3 LEP Language	Other and unspecified languages	2,061	0.3%
#4 LEP Language	German or other West Germanic languages	1,072	0.2%
#5 LEP Language	Russian, Polish, or other Slavic languages	855	0.1%
#6 LEP Language	French, Haitian, or Cajun	622	0.1%
#7 LEP Language	Chinese	582	0.1%
#8 LEP Language	Tagalog	544	0.1%
#9 LEP Language	Vietnamese	332	0%
#10 LEP Language	Other Asian and Pacific Island languages	278	0%

Education and Employment

Education and employment data from the State of North Dakota 2018 Five-Year ACS is presented in Table IV.9, Table IV.10, and Table IV.11. In 2018, 412,530 people were in the labor force, including 400,841 employed and 11,689 unemployed people. The unemployment rate for the State of North Dakota was estimated at 2.8 percent in 2018.

Table IV.9	
Employment, Labor Force and Unemployment	
State of North Dakota 2018 Five-Year ACS Data	
Employment Status	2018 Five-Year ACS
Employed	400,841
Unemployed	11,689
Labor Force	412,530
Unemployment Rate	2.8%

Table IV.10 and Table IV.11 show educational attainment in the State of North Dakota. In 2018, 93.2 percent of households had a high school education or greater, including 26.9 percent with a high school diploma or equivalent, 38.6 percent with some college, 20.1 percent with a Bachelor's Degree, and 6.8 percent with a graduate or professional degree.

Table IV.10	
High School or Greater Education	
State of North Dakota 2018 Five-Year ACS Data	
Education Level	Households
High School or Greater	293,423
Total Households	314,903
Percent High School or Above	93.2%

Table IV.11		
Educational Attainment		
State of North Dakota 2018 Five-Year ACS Data		
Education Level	2018 Five-Year ACS	Percent
Less Than High School	43,926	7.6%
High School or Equivalent	155,493	26.9%
Some College or Associates Degree	223,239	38.6%
Bachelor's Degree	116,539	20.1%
Graduate or Professional Degree	39,286	6.8%
Total Population Above 18 years	578,483	100.0%

Commuting Patterns

Table IV.12 shows the place of work by county of residence. In 2010, 85.5 percent of residents worked within the county they reside with 10.6 percent working outside their home county. This compares to 85.0 percent of residents in 2018 who worked within the county in which they resided, and 11.7 percent of residents worked outside their home county but still within the state.

Table IV.12 Place of Work State of North Dakota 2010 and 2018 Five-Year ACS Data				
Place of work	2010 Five-Year ACS	% of Total	2018 Five-Year ACS	% of Total
Worked in county of residence	299,422	85.5%	338,953	85.0%
Worked outside county of residence	37,149	10.6%	46,576	11.7%
Worked outside state of residence	13,445	3.8%	13,408	3.4%
Total	350,016	100.0%	398,937	100.0%

Table IV.13 shows the aggregate travel time to work based on place of work and residence. In the State of North Dakota the total aggregate travel time was 6,493,690 minutes, with residents working in their home county spending a total of 4,448,925 minutes traveling.

Table IV.13 Aggregate Travel Time to Work (in Minutes) State of North Dakota 2010 & 2018 Five-Year ACS Data				
Place of Work	2010 Five-Year ACS	% of Total	2018 Five-Year ACS	% of Total
Worked in county of residence	3,616,755	68.6%	4,448,925	68.5%
Worked outside county of residence	1,302,390	24.7%	1,707,195	26.3%
Worked outside State of residence	354,925	6.7%	337,570	5.2%
Aggregate travel time to work (in minutes):	5,274,065	100.0%	6,493,690	100.0%

Table IV.14 shows the average travel time to work based on place of work and residence. In 2018 the overall aggregate travel time was 5,274,065 minutes. Residents working within their home county spent an average of 13.1 minutes commuting to work, with those working outside their county of residence spending an average of 36.7 minutes on their commute.

Table IV.14
Average Travel Time to Work (in Minutes)

State of North Dakota
2010 & 2018 Five-Year ACS Data

Place of Work	2010 Five-Year ACS	2018 Five-Year ACS
Worked in county of residence	12.1	13.1
Worked outside county of residence	35.1	36.7
Worked outside State of residence	26.4	25.2
Average travel time to work (in minutes):	15.1	16.3

Table IV.15 shows the means of transportation to work. In 2018, 81.5 percent of commuters drove alone in a car, truck, or van. Only 8.6 percent carpooled, with an additional 0.5 percent taking public transportation. Also, there were 18,923 persons or 4.7 percent who worked from home.

Table IV.15
Means of Transportation to Work

State of North Dakota
2010 & 2018 Five-Year ACS Data

Means	2010 Five-Year ACS	% of Total	2018 Five-Year ACS	% of Total
Car, truck, or van: Drove alone	275,630	78.7%	325,252	81.5%
Car, truck, or van: Carpooled:	33,604	9.6%	34,507	8.6%
Public transportation (excluding taxicab):	2,003	0.6%	2,150	0.5%
Taxicab	213	0.1%	302	0.1%
Motorcycle	785	0.2%	358	0.1%
Bicycle	2,170	0.6%	1,485	0.4%
Walked	13,605	3.9%	13,631	3.4%
Other means	2,163	0.6%	2,329	0.6%
Worked at home	19,843	5.7%	18,923	4.7%
Total	350,016	100.0%	398,937	100.0%

Table IV.16 shows the breakdown of the means of transportation by tenure. In 2018, 54.9 percent of commuters owned their home and commuted alone by car, which compares to 57.5 percent in 2010. There were also 106,566 renters who drove alone in 2018 and accounted for 27.1 percent of the total commuter population. Commuters who owned their own home and took public transportation represented 0.1 percent of the population, which compares to 1,486 renters, or 0.4 percent taking public transportation.

Table IV.16				
Means Of Transportation To Work By Tenure				
State of North Dakota				
2010 & 2018 Five-Year ACS Data				
Tenure	2010 Five-Year ACS	% of Total	2018 Five-Year ACS	% of Total
Car, truck, or van - drove alone:				
Owner	197,536	57.5%	215,435	54.9%
Renter	74,934	21.8%	106,566	27.1%
Car, truck, or van - carpooled:				
Owner	23,626	6.9%	20,920	5.3%
Renter	9,115	2.7%	12,747	3.2%
Public transportation (excluding taxicab):				
Owner	621	0.2%	521	0.1%
Renter	1,330	0.4%	1,486	0.4%
Walked:				
Owner	7,023	2.0%	6,115	1.6%
Renter	5,153	1.5%	6,082	1.5%
Taxicab, motorcycle, bicycle, or other means:				
Owner	3,293	1.0%	2,124	0.5%
Renter	1,981	0.6%	2,235	0.6%
Worked at home:				
Owner	16,310	4.7%	15,579	4.0%
Renter	2,728	0.8%	2,872	0.7%
Total:	343,650	100.0%	392,682	100.0%

Summary

While the population in the State of North Dakota is growing, the racial and ethnic makeup of the area is not changing significantly. There are areas in the State, however, that do see high concentrations of Native American and Hispanic residents. Limited English Proficiency includes an estimated 0.5 percent or 3,286 people of the population speaks Spanish at home, followed by 0.3 percent or 2,220 people speaking Other Indo-European languages. In 2018, some 93.2 percent of households had a high school education or greater, including 26.9 percent with a high school diploma or equivalent, 38.6 percent with some college, 20.1 percent with a Bachelor's Degree, and 6.8 percent with a graduate or professional degree.

Economics

The following section describes the economic context for the State of North Dakota. The data presented here is from the Bureau of Economic Analysis (BEA) and the Bureau of Labor Statistics (BLS).

Labor Force

Table IV.17 shows labor force statistics for the State of North Dakota between 1990 and 2018. The unemployment rate in the State of North Dakota was 2.6 percent in 2018, with 10,544 unemployed persons and 404,299 in the labor force. The statewide unemployment rate in 2018 was 2.6 percent. In 2018, 393,755 people were employed, 10,544 were unemployed, and the labor force totaled 404,299 people.

Table IV.17 Labor Force Statistics State of North Dakota 1990 - 2018 BLS Data					
Year	State of North Dakota				Statewide Unemployment Rate
	Unemployment	Employment	Labor Force	Unemployment Rate	
1990	12,781	304,436	317,217	4.0%	4.0%
1991	13,735	301,479	315,214	4.4%	4.4%
1992	14,985	300,939	315,924	4.7%	4.7%
1993	13,866	310,061	323,927	4.3%	4.3%
1994	12,493	324,314	336,807	3.7%	3.7%
1995	10,951	329,348	340,299	3.2%	3.2%
1996	10,125	337,412	347,537	2.9%	2.9%
1997	9,568	341,823	351,391	2.7%	2.7%
1998	10,091	339,414	349,505	2.9%	2.9%
1999	11,272	332,180	343,452	3.3%	3.3%
2000	10,161	332,407	342,568	3.0%	3.0%
2001	9,996	331,820	341,816	2.9%	2.9%
2002	12,674	327,957	340,631	3.7%	3.7%
2003	12,824	331,852	344,676	3.7%	3.7%
2004	12,063	340,403	352,466	3.4%	3.4%
2005	12,037	343,508	355,545	3.4%	3.4%
2006	11,638	349,821	361,459	3.2%	3.2%
2007	11,468	355,766	367,234	3.1%	3.1%
2008	11,692	359,333	371,025	3.2%	3.2%
2009	15,210	353,455	368,665	4.1%	4.1%
2010	14,289	364,053	378,342	3.8%	3.8%
2011	13,481	375,153	388,634	3.5%	3.5%
2012	12,193	385,674	397,867	3.1%	3.1%
2013	11,801	394,392	406,193	2.9%	2.9%
2014	11,023	402,521	413,544	2.7%	2.7%
2015	11,531	401,537	413,068	2.8%	2.8%
2016	12,769	399,996	412,765	3.1%	3.1%
2017	10,947	399,449	410,396	2.7%	2.7%
2018	10,544	393,755	404,299	2.6%	2.6%

Diagram IV.3 shows the employment and labor force for the State of North Dakota. The difference between the two lines represents the number of unemployed persons. In the most recent year, employment stood at 393,755 persons, with the labor force reaching 404,299, indicating there were a total of 10,544 unemployed persons

Diagram IV.3
Employment and Labor Force
 State of North Dakota

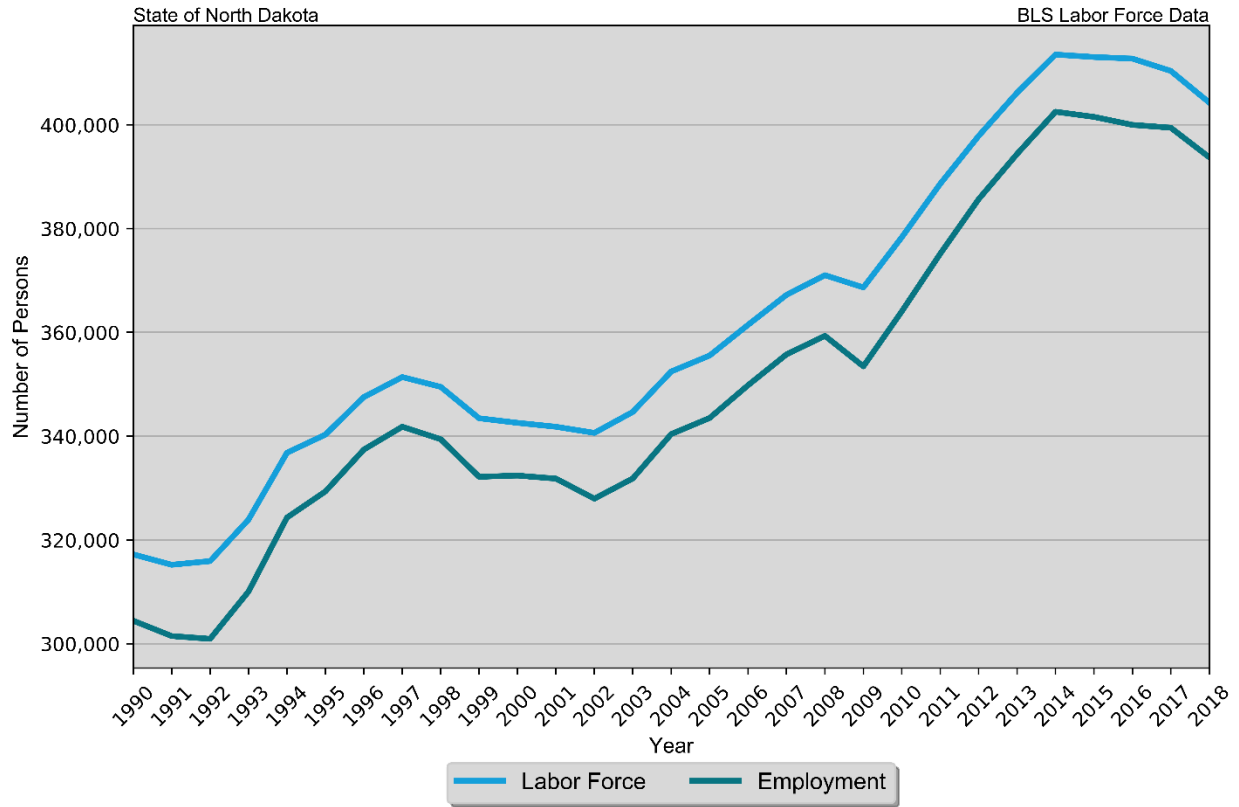
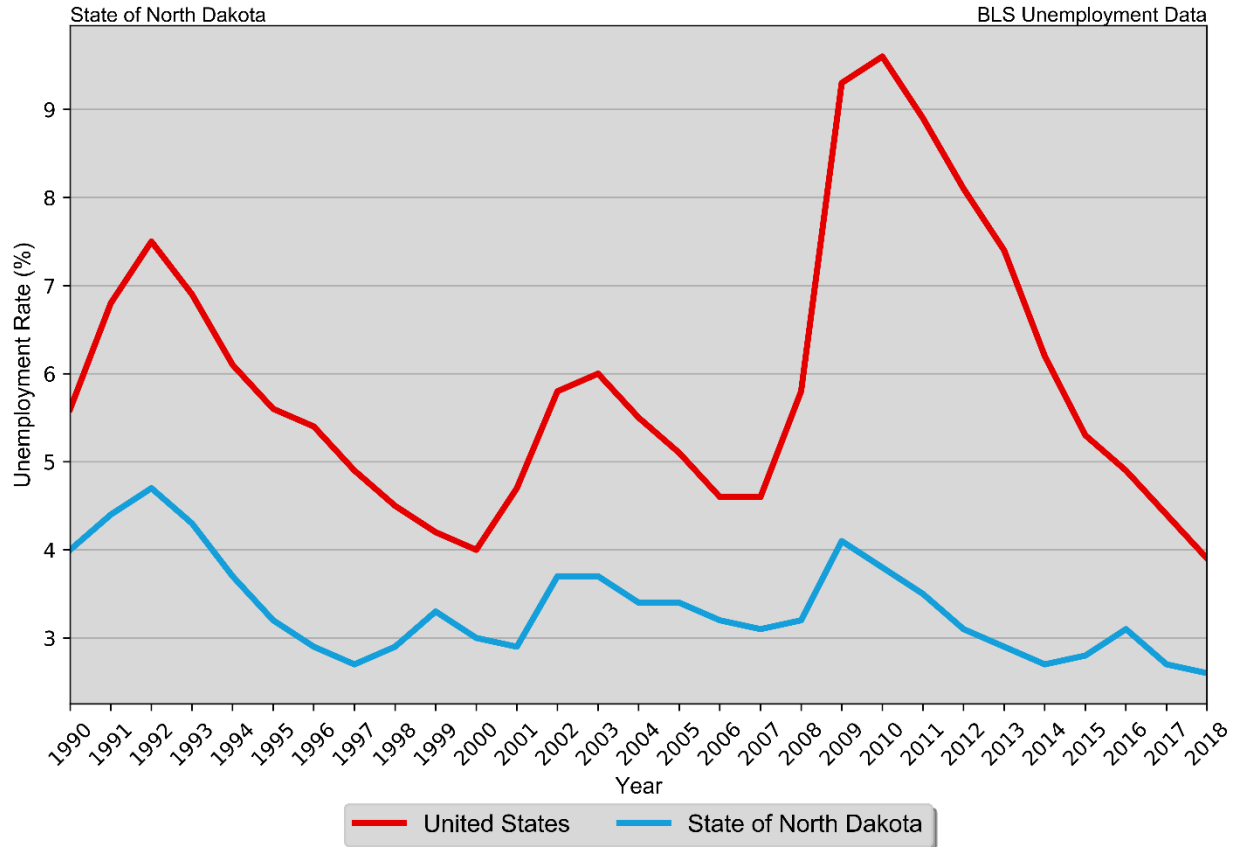


Diagram IV.4 shows the unemployment rate for the State of North Dakota. During the 1990's the average rate for the State of North Dakota was 3.6 percent. Between 2000 and 2010 the unemployment rate had an average of 3.4 percent. Since 2010, the average unemployment rate was 3.0 percent. Over the course of the entire period the State of North Dakota had an average unemployment rate of 3.3 percent.

Diagram IV.4
Annual Unemployment Rate
 State of North Dakota
 1990 – 2018 BLS Data



Earnings and Employment

The Bureau of Economic Analysis (BEA) produces regional economic accounts, which provide a consistent framework for analyzing and comparing individual state and local area economies. Table IV.18 shows total real earnings by industry for State of North Dakota. In 2017, the government and government enterprises industry had the largest total real earnings at \$5,673,323,000. Between 2016 and 2017, the arts, entertainment, and recreation industry saw the largest percentage increase of 22.0 percent, to \$142,668,000.

Table IV.18
Real Earnings by Industry

State of North Dakota
BEA Table CA-5N Data (1,000's of 2018 Dollars)

NAICS Categories	2010	2011	2012	2013	2014	2015	2016	2017	2018	% Change 17-18
Farm earnings	2,400,010	2,200,305	3,905,343	2,058,366	896,982	266,584	820,902	908,029	1,094,929	20.6
Forestry, fishing, related activities, and other	150,156	130,692	158,535	156,292	165,829	182,918	196,350	208,452	212,172	1.8
Mining	1,231,748	2,130,943	3,173,873	3,506,264	4,227,265	3,080,630	1,948,642	2,340,123	2,746,761	17.4
Utilities	424,610	426,497	401,887	448,568	481,199	515,880	548,733	533,580	534,690	0.2
Construction	2,104,589	2,527,919	3,165,133	3,435,297	3,812,687	3,678,328	3,288,709	2,733,805	2,686,613	-1.7
Manufacturing	1,503,955	1,525,959	1,573,240	1,693,261	1,853,478	1,897,355	1,792,887	1,744,552	1,822,074	4.4
Wholesale trade	1,682,868	1,949,285	2,291,747	2,454,390	2,528,173	2,450,902	2,096,039	2,143,443	2,120,103	-1.1
Retail trade	1,671,578	1,844,312	2,031,066	2,167,786	2,272,073	2,250,983	2,068,600	1,976,650	1,942,098	-1.7
Transportation and warehousing	1,105,754	1,572,396	2,129,227	2,380,010	2,755,427	2,471,886	1,915,849	1,881,075	1,927,337	2.5
Information	587,014	564,751	572,235	564,730	583,800	549,245	579,412	597,548	625,963	4.8
Finance and insurance	1,167,370	1,214,294	1,261,083	1,330,076	1,392,985	1,464,851	1,536,253	1,565,610	1,601,806	2.3
Real estate and rental and leasing	663,378	813,917	1,068,843	887,156	1,072,141	1,001,077	1,098,781	942,995	954,862	1.3
Professional and technical services	1,034,560	1,139,342	1,379,232	1,538,117	1,708,421	1,674,387	1,549,400	1,514,720	1,546,497	2.1
Management of companies and enterprises	383,821	399,847	436,578	473,738	512,753	534,137	510,840	532,348	546,195	2.6
Administrative and waste services	487,581	571,023	675,717	724,408	810,123	771,928	721,087	747,480	766,811	2.6
Educational services	134,506	136,154	142,499	143,552	151,833	156,250	160,206	152,883	163,870	7.2
Health care and social assistance	3,024,337	3,148,119	3,285,801	3,400,747	3,516,401	3,735,973	3,883,909	3,934,822	3,991,018	1.4
Arts, entertainment, and recreation	97,077	97,764	98,897	102,043	111,191	111,839	117,544	116,936	142,668	22.0
Accommodation and food services	616,518	694,021	856,611	916,465	949,416	903,633	838,707	818,265	825,682	0.9
Other services, except public administration	868,714	897,906	981,169	1,017,570	1,102,683	1,110,231	1,063,517	1,046,315	1,054,571	0.8
Government and government enterprises	4,995,450	5,023,273	5,028,157	5,162,212	5,327,938	5,595,108	5,710,056	5,693,550	5,673,323	-0.4
Total	26,335,593	29,008,716	34,616,874	34,561,047	36,232,798	34,404,123	32,446,423	32,133,180	32,980,043	2.6

Table IV.19 shows the total employment by industry for the State of North Dakota. The most recent estimates show the government and government enterprises industry was the largest employer in the State of North Dakota, with employment reaching 88,578 jobs in 2017. Between 2016 and 2017 the arts, entertainment, and recreation industry saw the largest percentage increase, rising by 15.7 percent to 9,891 jobs.

Table IV.19										
Employment by Industry										
State of North Dakota BEA Table CA25 Data										
NAICS Categories	2010	2011	2012	2013	2014	2015	2016	2017	2018	% Change 17-18
Farm earnings	31,652	32,316	33,055	33,555	32,511	29,622	28,481	28,400	28,290	-0.4
Forestry, fishing, related activities, and other	4,401	4,496	4,633	4,656	4,960	4,570	4,784	4,924	5,246	6.5
Mining	13,858	20,191	30,046	32,682	36,529	30,290	23,096	24,257	27,073	11.6
Utilities	3,502	3,488	3,580	3,677	3,799	3,953	4,026	3,884	3,767	-3.0
Construction	29,925	33,404	39,260	42,422	45,141	43,885	41,093	36,205	35,768	-1.2
Manufacturing	23,815	25,182	26,563	26,963	27,495	27,091	26,288	26,452	27,781	5.0
Wholesale trade	22,116	23,870	26,302	27,669	29,168	28,678	25,683	25,193	24,887	-1.2
Retail trade	53,725	55,223	57,490	59,906	61,832	62,266	60,343	59,438	58,648	-1.3
Transportation and warehousing	16,793	20,729	25,882	27,570	29,495	27,834	22,844	25,434	27,194	6.9
Information	8,152	7,919	7,721	7,626	7,697	7,442	7,486	7,374	7,146	-3.1
Finance and insurance	24,416	26,053	25,888	26,309	26,554	27,017	27,372	27,069	27,175	0.4
Real estate and rental and leasing	16,761	18,620	19,938	21,419	23,406	23,802	23,808	24,453	25,223	3.1
Professional and technical services	18,884	19,093	20,829	22,275	23,629	24,023	23,144	22,969	23,103	0.6
Management of companies and enterprises	4,517	4,690	5,004	5,424	5,653	5,693	5,824	5,735	5,750	0.3
Administrative and waste services	16,413	17,613	18,421	18,508	19,585	18,504	17,859	18,156	18,545	2.1
Educational services	5,786	5,676	5,754	6,148	6,180	6,376	6,497	6,667	6,836	2.5
Health care and social assistance	59,475	60,400	61,753	62,927	63,225	64,466	66,041	66,543	66,863	0.5
Arts, entertainment, and recreation	7,080	7,048	7,346	7,570	7,892	7,760	8,168	8,549	9,891	15.7
Accommodation and food services	32,902	34,235	36,484	37,550	38,971	38,803	37,518	37,674	37,796	0.3
Other services, except public administration	24,861	25,356	25,865	26,418	27,384	27,725	27,251	27,080	26,296	-2.9
Government and government enterprises	84,779	84,177	85,574	86,124	85,883	87,675	89,009	88,564	88,578	0
Total	503,813	529,779	567,388	587,398	606,989	597,475	576,615	575,020	581,856	1.2

Table IV.20 shows the real average earnings per job by industry for the State of North Dakota. These figures are calculated by dividing the total real earning displayed in Tables IV.18 and Table IV.19, by industry. In 2017, the utilities industry had the highest average earnings reaching 141,941 dollars. Between 2016 and 2017 the farm industry saw the largest percentage increase, rising by 21.1 percent to 38,704 dollars.

Table IV.20
Real Earnings Per Job by Industry
 State of North Dakota
 BEA Table CA5N and CA25 Data

NAICS Categories	2010	2011	2012	2013	2014	2015	2016	2017	2018	% Change 17-18
Farm earnings	75,825	68,087	118,147	61,343	27,590	9,000	28,823	31,973	38,704	21.1
Forestry, fishing, related activities, and other	34,119	29,068	34,219	33,568	33,433	40,026	41,043	42,334	40,445	-4.5
Mining	88,884	105,539	105,634	107,284	115,724	101,705	84,371	96,472	101,458	5.2
Utilities	121,248	122,275	112,259	121,993	126,665	130,503	136,297	137,379	141,941	3.3
Construction	70,329	75,677	80,620	80,979	84,462	83,817	80,031	75,509	75,112	-0.5
Manufacturing	63,152	60,597	59,227	62,799	67,411	70,036	68,202	65,952	65,587	-0.6
Wholesale trade	76,093	81,663	87,132	88,705	86,676	85,463	81,612	85,081	85,189	0.1
Retail trade	31,114	33,398	35,329	36,186	36,746	36,151	34,281	33,256	33,114	-0.4
Transportation and warehousing	65,846	75,855	82,267	86,326	93,420	88,808	83,867	73,959	70,874	-4.2
Information	72,009	71,316	74,114	74,053	75,848	73,803	77,399	81,034	87,596	8.1
Finance and insurance	47,812	46,609	48,713	50,556	52,459	54,220	56,125	57,838	58,944	1.9
Real estate and rental and leasing	39,579	43,712	53,608	41,419	45,806	42,059	46,152	38,564	37,857	-1.8
Professional and technical services	54,785	59,673	66,217	69,051	72,302	69,699	66,946	65,946	66,939	1.5
Management of companies and enterprises	84,973	85,255	87,246	87,341	90,705	93,823	87,713	92,824	94,990	2.3
Administrative and waste services	29,707	32,421	36,682	39,140	41,364	41,717	40,377	41,170	41,349	0.4
Educational services	23,247	23,988	24,765	23,349	24,568	24,506	24,659	22,931	23,972	4.5
Health care and social assistance	50,851	52,121	53,209	54,043	55,617	57,953	58,811	59,132	59,689	0.9
Arts, entertainment, and recreation	13,711	13,871	13,463	13,480	14,089	14,412	14,391	13,678	14,424	5.5
Accommodation and food services	18,738	20,272	23,479	24,407	24,362	23,288	22,355	21,720	21,846	0.6
Other services, except public administration	34,943	35,412	37,934	38,518	40,267	40,044	39,027	38,638	40,104	3.8
Government and government enterprises	58,923	59,675	58,758	59,939	62,037	63,816	64,151	64,287	64,049	-0.4
Total	52,273	54,756	61,011	58,838	59,693	57,583	56,271	55,882	56,681	1.4

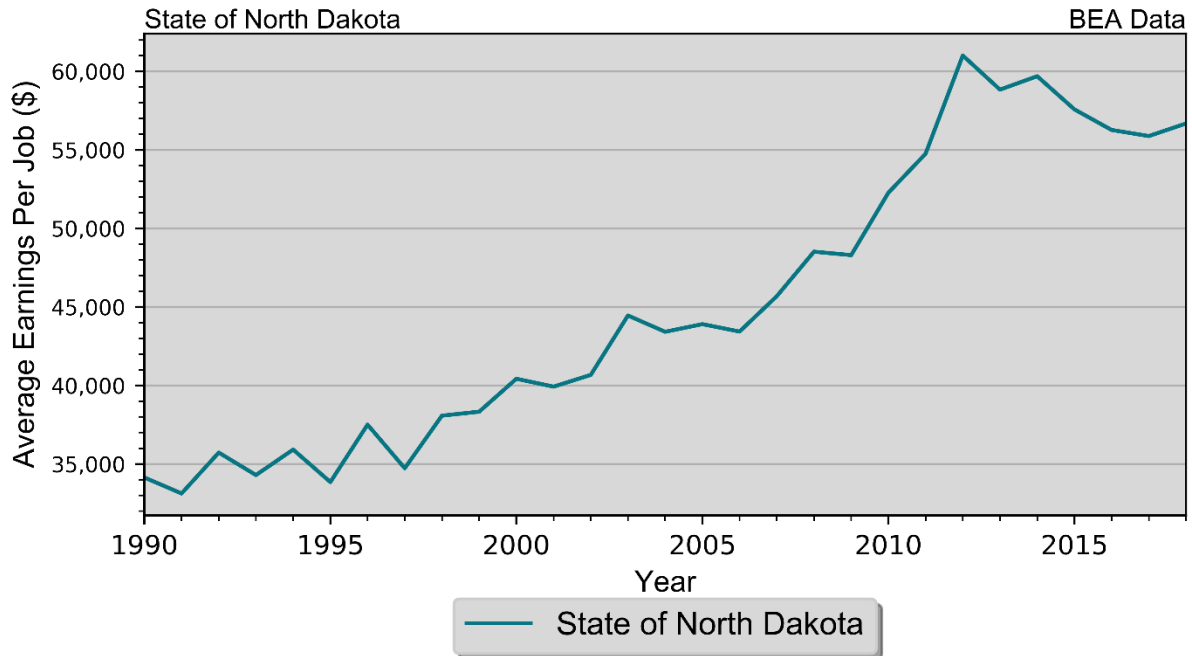
Table IV.21 shows total employment and real personal income for the years of 1969 to 2017. Total real personal income includes all wage and salary earnings, proprietorship income, dividends, interest, rents, and transfer payments. In 2018, total real personal income was \$42,147,741,000, a 3.6 percent change between 2016 and 2017. Total employment was 503,813 in 2010 and 581,856 in 2017, a change of 1.2 percent over the period.

Table IV.21
Total Employment and Real Personal Income
 State of North Dakota
 BEA Data 1969 Through 2018

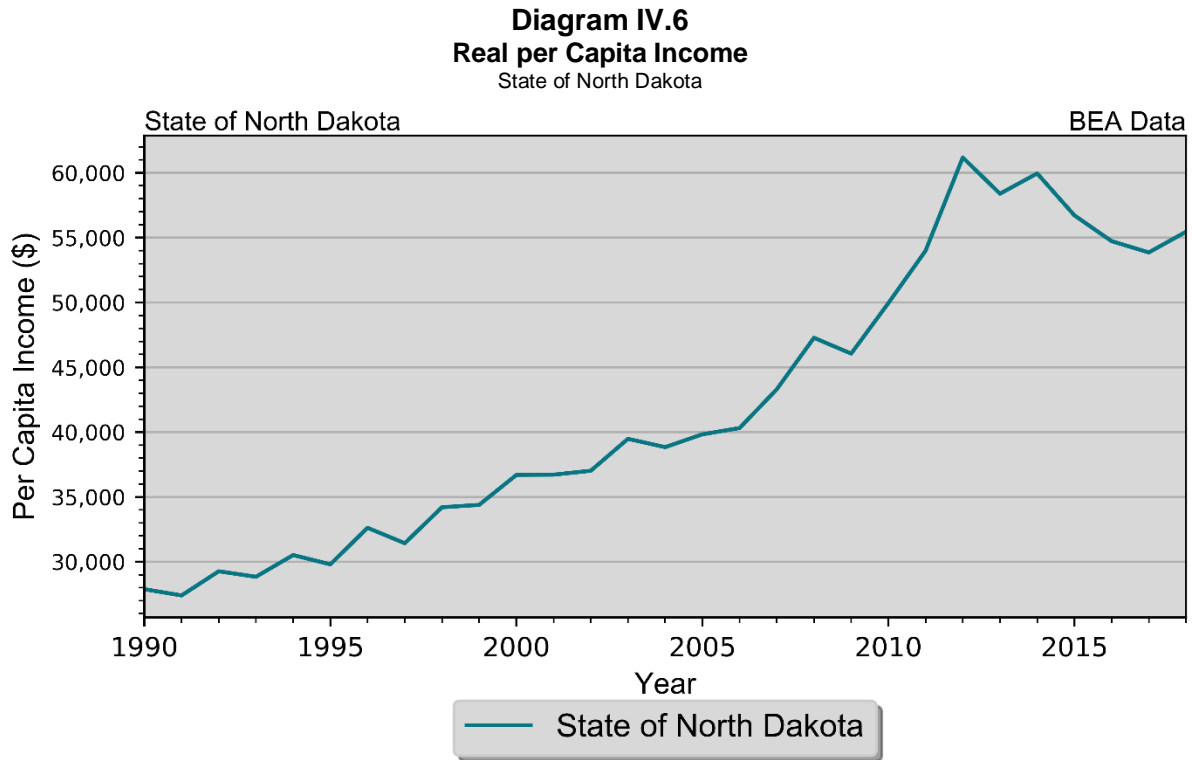
Year	1,000s of 2018 Dollars						Per Capita Income	Total Employment	Average Real Earnings Per Job
	Earnings	Social Security Contributions	Residents Adjustments	Dividends, Interest, Rents	Transfer Payments	Personal Income			
1969	8,769,308	547,651	-295,802	1,768,777	978,665	10,673,298	17,185	273,930	32,011
1970	8,643,467	583,992	-293,294	1,860,606	1,077,755	10,704,542	17,296	281,458	30,708
1971	9,497,232	625,041	-292,971	1,969,472	1,202,176	11,750,868	18,749	283,811	33,461
1972	11,024,083	684,436	-296,846	2,087,209	1,281,078	13,411,087	21,254	288,138	38,258
1973	15,188,446	833,738	-297,015	2,351,048	1,366,821	17,775,561	28,107	300,252	50,586
1974	13,441,556	905,806	-319,329	2,501,107	1,436,695	16,154,222	25,471	308,009	43,640
1975	12,516,598	946,864	-307,415	2,647,755	1,553,920	15,463,994	24,220	313,546	39,919
1976	11,393,183	1,028,791	-338,721	2,723,589	1,628,177	14,377,438	22,282	325,944	34,953
1977	10,817,013	998,472	-338,333	2,910,851	1,671,997	14,063,056	21,663	330,976	32,683
1978	13,210,903	1,090,259	-348,162	3,042,347	1,706,503	16,521,332	25,393	345,094	38,282
1979	12,313,477	1,173,067	-369,949	3,164,972	1,746,264	15,681,697	24,046	353,425	34,841
1980	9,833,076	1,175,689	-379,721	3,589,846	1,892,016	13,759,527	21,026	354,849	27,710
1981	11,948,891	1,270,451	-396,186	4,193,743	1,982,612	16,458,609	24,957	358,792	33,304
1982	11,703,078	1,295,062	-377,601	4,621,260	2,093,406	16,745,082	25,030	359,535	32,550
1983	11,954,203	1,325,948	-369,105	4,432,744	2,240,275	16,932,169	25,023	365,143	32,739
1984	12,464,752	1,360,845	-355,555	4,584,530	2,317,915	17,650,797	25,937	366,419	34,017
1985	12,443,133	1,371,125	-342,965	4,563,938	2,386,802	17,679,784	26,117	363,513	34,229
1986	12,299,427	1,383,635	-333,054	4,454,128	2,551,711	17,588,578	26,270	357,386	34,414
1987	12,624,851	1,406,734	-325,430	4,175,499	2,604,149	17,672,336	26,730	362,693	34,808
1988	11,072,432	1,484,454	-327,456	4,035,637	2,529,198	15,825,357	24,150	366,328	30,226
1989	12,005,723	1,510,210	-324,052	4,232,076	2,651,640	17,055,176	26,387	370,190	32,432
1990	12,765,818	1,617,138	-319,298	4,215,967	2,736,527	17,781,878	27,885	373,890	34,144
1991	12,661,682	1,680,704	-320,198	4,067,736	2,692,341	17,420,857	27,402	382,218	33,128
1992	13,849,134	1,745,165	-337,664	4,006,429	2,905,243	18,677,978	29,265	387,620	35,729
1993	13,612,747	1,835,146	-360,959	4,087,447	2,989,705	18,493,794	28,842	396,886	34,299
1994	14,774,841	1,913,983	-377,155	4,211,247	2,981,360	19,676,309	30,516	411,338	35,920
1995	14,153,571	1,950,330	-402,156	4,418,309	3,087,371	19,306,764	29,802	418,075	33,853
1996	15,970,579	2,001,659	-443,424	4,533,744	3,156,066	21,215,306	32,620	425,783	37,508
1997	14,931,625	2,037,718	-475,934	4,766,799	3,235,076	20,419,847	31,429	429,892	34,733
1998	16,561,651	2,109,296	-504,391	4,961,045	3,239,430	22,148,438	34,204	434,930	38,079
1999	16,699,308	2,136,806	-535,382	4,797,211	3,330,305	22,154,635	34,388	435,651	38,332
2000	17,814,393	2,191,222	-571,031	5,012,498	3,495,279	23,559,918	36,696	440,643	40,428
2001	17,784,750	2,201,327	-597,877	4,970,989	3,509,357	23,465,893	36,719	445,433	39,927
2002	18,000,236	2,244,250	-608,761	4,816,491	3,661,301	23,625,016	37,020	442,537	40,675
2003	19,725,359	2,322,952	-627,597	4,720,211	3,727,299	25,222,320	39,483	443,699	44,456
2004	19,672,954	2,394,939	-679,163	4,605,284	3,837,373	25,041,509	38,841	453,086	43,420
2005	20,269,179	2,422,928	-719,711	4,684,955	3,922,961	25,734,456	39,831	461,645	43,907
2006	20,463,503	2,464,286	-777,817	4,898,267	4,061,704	26,181,370	40,315	471,138	43,434
2007	22,043,265	2,522,377	-839,704	5,348,372	4,239,388	28,268,944	43,302	482,505	45,686
2008	23,867,217	2,647,811	-891,824	6,056,754	4,703,480	31,087,817	47,277	491,898	48,520
2009	23,784,567	2,811,565	-932,886	5,708,036	4,879,586	30,627,739	46,059	492,417	48,301
2010	26,335,593	2,875,454	-1,110,529	6,134,765	5,217,972	33,702,346	49,951	503,813	52,273
2011	29,008,716	2,953,107	-1,486,720	7,192,369	5,230,717	36,991,975	53,993	529,779	54,756
2012	34,616,874	3,139,127	-2,098,827	8,338,158	5,179,253	42,896,331	61,183	567,388	61,011
2013	34,561,047	3,771,757	-2,486,335	8,585,879	5,268,486	42,157,318	58,390	587,398	58,837
2014	36,232,798	4,116,331	-2,805,215	9,394,129	5,504,340	44,209,721	59,955	606,989	59,692
2015	34,404,123	4,053,019	-2,521,279	9,217,385	5,721,784	42,768,995	56,721	597,475	57,582
2016	32,446,423	3,855,509	-2,061,516	8,904,370	5,852,259	41,286,027	54,731	576,615	56,271
2017	32,133,180	3,926,069	-2,137,405	8,782,619	5,821,172	40,673,497	53,859	575,020	55,882
2018	32,980,043	3,900,954	-2,276,200	9,268,711	6,076,141	42,147,741	55,452	581,856	56,681

Diagram IV.5 shows real average earnings per job for the State of North Dakota from 1990 to 2017. Over this period the average earning per job for the State of North Dakota was 45,085 dollars, which was lower than the statewide average of 45,085 dollars over the same period.

Diagram IV.5
Real Average Earnings per Job
State of North Dakota



Per capita income is a broader measure of wealth than real average earnings per job, which only captures the working population. Diagram IV.6 shows real per capita income for the State of North Dakota from 1990 to 2017 of \$41,936.



Quarterly Census of Employment and Wages

The BLS produces the Quarterly Census of Employment and Wages (QCEW), which reports monthly data on employment and quarterly data on wages and number of business establishments. QCEW employment data represent only filled jobs, whether full or part-time, temporary or permanent, by place of work the pay period. If data do not meet BLS or State agency disclosure standards they are displayed as (ND) and not disclosed. Data from this series are from the period of January 2006 through June 2019 and are presented in Table IV.24, with 2019 data being considered preliminary. Between 2017 and 2018, total annual employment increased from 414,038 persons in 2017 to 417,578 in 2018, a change of 0.9 percent.

Table IV.22
Total Monthly Employment
 State of North Dakota
 BLS QCEW Data, 2001–2018(p)

Period	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019(p)
Jan	342,072	359,360	389,863	409,788	423,483	439,854	411,019	403,208	405,444	412,540
Feb	343,683	360,753	392,370	412,653	426,526	437,989	410,239	404,269	406,539	413,164
Mar	347,245	364,438	397,568	415,263	428,990	436,470	409,611	405,765	408,303	414,429
Apr	355,753	370,674	406,372	417,943	436,820	438,633	415,787	413,040	411,434	419,658
May	361,785	378,698	415,118	429,230	447,424	443,944	421,417	419,618	422,251	428,727
Jun	363,960	382,591	420,059	433,822	452,946	445,064	423,515	422,821	426,171	431,800
Jul	355,733	376,293	412,854	425,135	444,583	432,845	415,066	411,531	415,907	
Aug	357,406	379,913	415,372	428,610	446,781	432,407	416,066	412,203	416,810	
Sep	366,334	391,476	422,468	437,155	455,516	438,010	423,315	419,611	424,339	
Oct	371,739	396,087	425,800	440,717	460,323	438,521	424,584	421,896	426,926	
Nov	369,082	395,921	421,628	439,954	457,644	433,031	420,429	418,386	424,483	
Dec	368,830	396,977	421,030	435,025	454,792	428,099	414,376	416,106	422,324	
Annual	358,635	379,432	411,709	427,108	444,652	437,072	417,119	414,038	417,578	
% Change	2.6%	5.8%	8.5%	3.7%	4.1%	-1.7%	-4.6%	-0.7%	0.9%	

The QCEW also reports average weekly wages, which represents total compensation paid during the calendar quarter, regardless of when services were performed. The BLS QCEW data indicated average weekly wages were 968 dollars in 2017. In 2018, average weekly wages saw an increase of 4.0 percent over the prior year, rising to 1,007 dollars, or by 39 dollars. These data are shown in Table IV.23.

Table IV.23
Average Weekly Wages
 State of North Dakota
 BLS QCEW Data, 2001–2018

Year	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Annual	% Change
2002	500	499	503	540	511	3.4%
2003	519	516	527	563	531	3.9%
2004	542	539	548	600	557	4.9%
2005	548	561	581	614	576	3.4%
2006	587	591	587	643	602	4.5%
2007	614	618	622	690	636	5.6%
2008	653	655	665	725	675	6.1%
2009	667	667	680	752	692	2.5%
2010	683	711	726	809	733	5.9%
2011	748	769	820	871	803	9.5%
2012	858	855	873	944	883	10.0%
2013	885	887	921	980	919	4.1%
2014	944	936	979	1,050	978	6.4%
2015	983	939	957	1,021	975	-0.3%
2016	908	908	965	978	940	-3.6%
2017	953	954	953	1,010	968	3.0%
2018	988	986	995	1,057	1,007	4.0%
2019(p)	1,021	1,026				

Total business establishments reported by the QCEW are displayed in Table IV.24. Between 2017 and 2018, the total number of business establishments in North Dakota decreased by 4.0 percent, from 31,917 to 31,881 establishments. The most recent preliminary 2018 estimates show there were 31,851 business establishments in the second quarter of 2018.

Table IV.24						
Number of Business Establishments						
State of North Dakota						
BLS QCEW Data, 2001–2018(p)						
Year	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Annual	% Change
2001	23,280	23,334	23,371	23,319	23,326	
2002	23,325	23,548	23,581	23,631	23,521	0.8%
2003	23,718	23,803	23,878	23,997	23,849	1.4%
2004	24,065	24,251	24,375	24,481	24,293	1.9%
2005	24,637	24,777	24,880	25,071	24,841	2.3%
2006	25,204	25,289	24,693	24,612	24,950	0.4%
2007	24,845	25,130	25,231	25,353	25,140	0.8%
2008	25,364	25,638	25,785	25,819	25,652	2.0%
2009	25,615	25,792	25,890	25,951	25,812	0.6%
2010	25,751	26,016	26,356	26,526	26,162	1.4%
2011	26,588	27,106	27,636	28,067	27,349	4.5%
2012	28,488	29,186	29,771	30,134	29,395	7.5%
2013	30,251	30,612	30,896	31,224	30,746	4.6%
2014	31,058	31,469	31,756	32,066	31,587	2.7%
2015	31,915	32,132	32,297	32,217	32,140	1.8%
2016	31,967	32,071	32,137	32,168	32,086	-0.2%
2017	31,796	31,903	31,963	32,006	31,917	-0.5%
2018	31,593	31,851	32,072	32,009	31,881	-0.1%
2019(p)	31,668	31,934				

Poverty

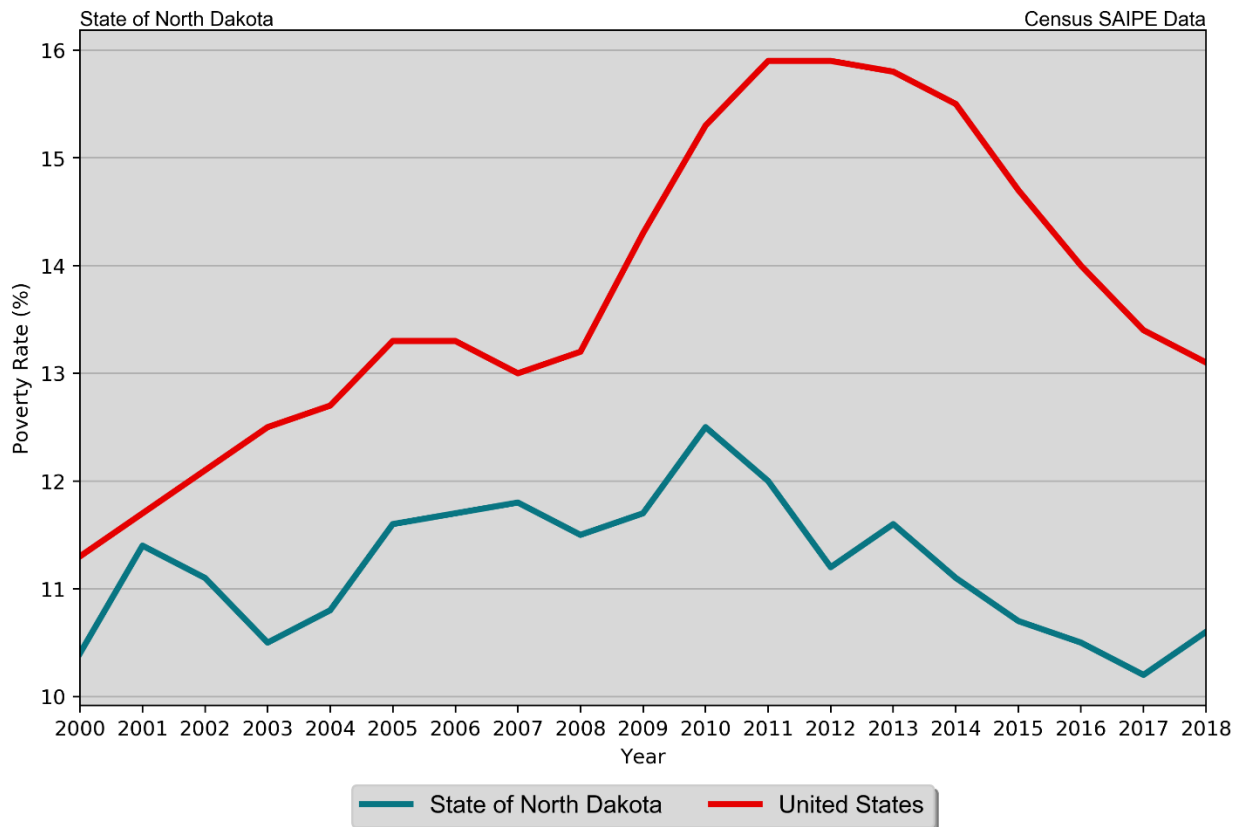
Poverty is the condition of having insufficient resources or income. In its extreme form, poverty is a lack of basic human needs, such as adequate and healthy food, clothing, housing, water, and health services. According to the Census Bureau's Small Area Income and Poverty Estimates Program, the number of individuals in poverty decreased from 81,176 in 2010 to 77,959 in 2017, with the poverty rate reaching 10.6 percent in 2017. This compared to a national rate of 13.1 percent in 2017. Table IV.25, at right, presents poverty data for the State.

The rate of poverty for the State of North Dakota is shown in Table IV.26. In 2017, there were an estimated 79,270 people or 10.9 percent living in poverty, compared to 11.9 percent living in poverty in 2000. In 2017, some 10.9 percent of those in poverty were under age 6 and 12.0 percent were 65 or older. This data is also displayed in Diagram IV.7 on the following page.

Table IV.25		
Persons in Poverty		
State of North Dakota		
2000–2017 SAIPE Estimates		
Year	Persons 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%
2013	81,055	11.6%
2014	79,203	11.1%
2015	78,613	10.7%
2016	76,951	10.5%
2017	74,057	10.2%

Table IV.26 Poverty by Age State of North Dakota 2000 Census SF3 & 2018 Five-Year ACS Data				
Age	2000 Census		2018 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	8,173	11.1%	8,604	10.9%
6 to 17	13,990	19.0%	12,258	15.5%
18 to 64	41,568	56.6%	48,920	61.7%
65 or Older	9,726	13.2%	9,488	12.0%
Total	73,457	100.0%	79,270	100.0%
Poverty Rate	11.9%	.	10.9%	.

**Diagram IV.7
Poverty Rates**
State of North Dakota
SAIPE Estimates 2000 – 2017



Summary

In 2018, unemployment in the State was at 2.6 percent. This is representative of a labor force of 404,299 people and 393,755 people employed. Real per capita income has stagnated the last few years. However, poverty has declined to 10.9 percent, representing 79,270 persons living in poverty in the State.

Housing

Housing Production

The Census Bureau reports building permit authorizations and “per unit” valuation of building permits by county annually. Single-family construction usually represents most residential development in the county. Single-family building permit authorizations in State of North Dakota decreased from 2,111 authorizations in 2017 to 1,905 authorizations in 2018.

The real value of single-family building permits increased from 236,464 dollars in 2017 to 243,696 dollars in 2018. This compares to an increase in permit value statewide, with values rising from 236,464 dollars in 2017 to 243,696 dollars in 2018. Additional details are given in Table IV.27 as well as in Diagram IV.8 and Diagram IV.9.

Year	Authorized Construction in Permit Issuing Areas					Per Unit Valuation, (Real 2017\$)	
	Single-Family	Duplex Units	Tri- and Four-Plex	Multi-Family Units	Total Units	Single-Family Units	Multi-Family Units
1980	1,666	168	214	1,087	3,135	123,259	59,959
1981	1,071	110	135	865	2,181	122,390	57,138
1982	1,488	66	153	1,178	2,885	119,469	45,664
1983	1,948	200	316	2,140	4,604	125,731	47,598
1984	1,397	142	204	1,442	3,185	124,447	50,852
1985	890	126	134	1,491	2,641	126,359	50,308
1986	874	102	112	614	1,702	132,277	50,684
1987	913	70	98	889	1,970	136,039	47,962
1988	848	46	121	800	1,815	141,590	45,844
1989	828	34	36	1,312	2,210	147,460	42,668
1990	858	10	23	621	1,512	145,502	42,413
1991	1,060	20	15	1,030	2,125	137,284	40,331
1992	1,475	10	51	1,082	2,618	145,866	43,440
1993	1,614	42	101	1,226	2,983	148,270	46,076
1994	1,639	38	90	1,613	3,380	146,645	48,190
1995	1,460	28	84	1,615	3,187	148,282	50,577
1996	1,480	36	50	759	2,325	150,677	54,010
1997	1,489	118	42	1,574	3,223	145,991	62,051
1998	1,707	176	82	1,012	2,977	158,118	63,036
1999	1,445	76	47	1,011	2,579	168,514	60,387
2000	1,259	88	119	664	2,130	164,759	54,241
2001	1,486	34	114	1,057	2,691	169,545	60,444
2002	1,800	104	93	1,275	3,272	177,623	62,893
2003	2,355	30	156	1,191	3,732	182,065	69,271
2004	2,521	60	98	1,354	4,033	176,905	71,305
2005	2,367	70	140	1,461	4,038	186,662	73,438
2006	2,297	60	126	1,046	3,529	188,455	103,170
2007	2,194	24	125	1,017	3,360	192,326	89,199
2008	1,888	44	39	862	2,833	203,488	84,955
2009	1,704	44	43	1,404	3,195	198,749	45,118
2010	2,084	48	38	1,663	3,833	199,177	77,107
2011	2,913	50	123	3,115	6,201	196,768	92,878
2012	4,540	310	233	5,257	10,340	215,518	93,294
2013	3,931	170	158	6,305	10,564	214,319	95,373
2014	4,995	84	22	7,541	12,642	197,649	103,469
2015	3,440	66	19	2,731	6,256	207,791	101,209
2016	2,359	56	51	1,515	3,981	242,953	102,732
2017	2,111	42	10	1,248	3,411	236,464	90,103
2018	1,905	50	15	1,241	3,211	243,696	106,118

Diagram IV.8 Single-Family Permits

State of North Dakota
Census Bureau Data, 1980–2018

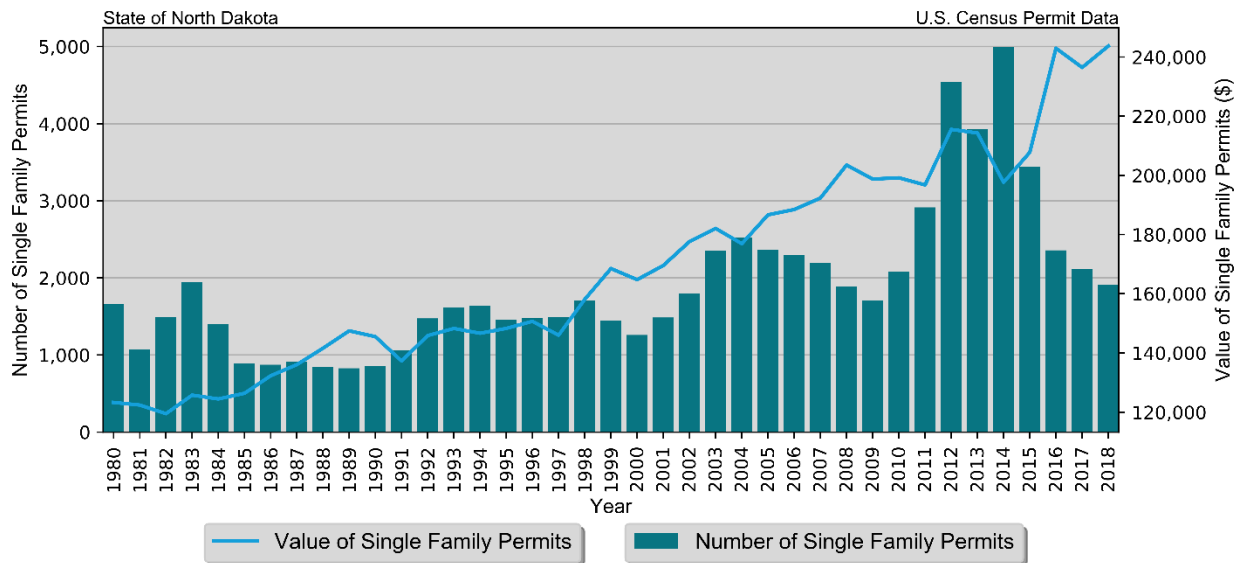
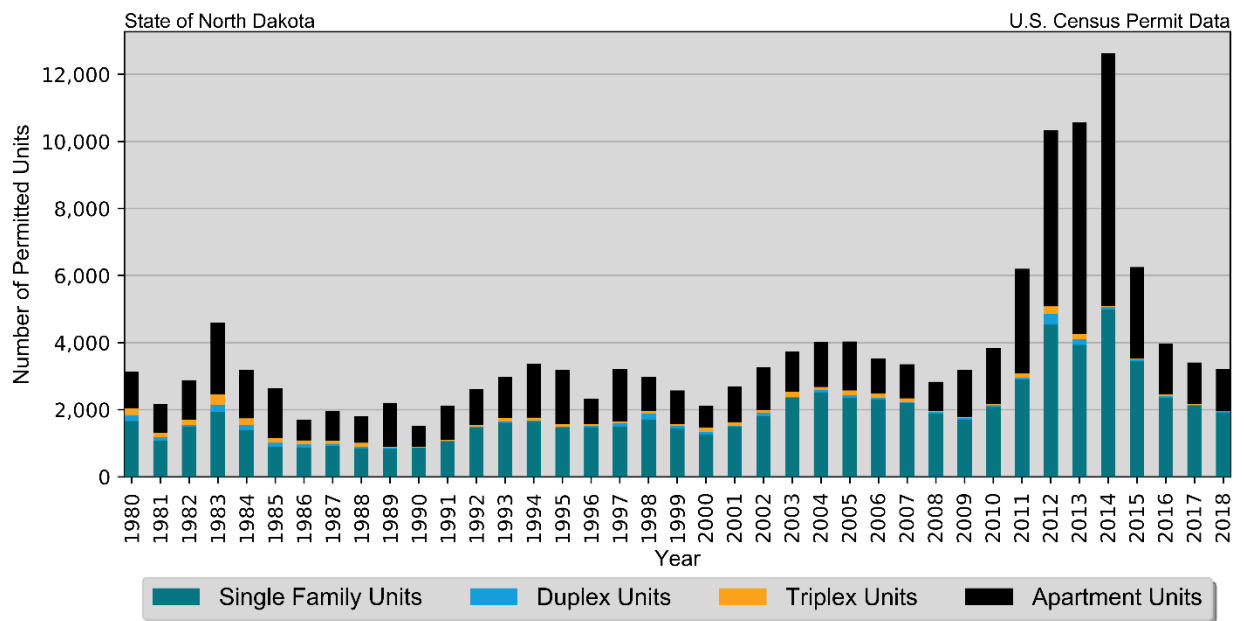


Diagram IV.9 Total Permits by Unit Type

State of North Dakota
Census Bureau Data, 1980–2018



Housing Characteristics

Households by type and tenure are shown in Table IV.28. Family households represented 59.8 percent of households, while non-family households accounted for 40.2 percent. These changed from 60.8 and 39.2 percent, respectively.

Table IV.28				
Household Type by Tenure				
State of North Dakota				
2010 Census SF1 & 2018 Five-Year ACS Data				
Household Type	2010 Census		2018 Five-Year ACS	
	Households	Households	Households	% of Total
Family Households	170,916	60.8%	188,288	59.8%
Married-Couple Family	136,522	79.9%	151,214	80.3%
Owner-Occupied	117,507	86.1%	125,695	83.1%
Renter-Occupied	19,015	13.9%	25,519	16.9%
Other Family	34,394	20.1%	37,074	18.3%
Male Householder, No Spouse Present	11,406	33.2%	13,122	30.8%
Owner-Occupied	6,856	60.1%	7,023	53.5%
Renter-Occupied	4,550	39.9%	6,099	46.5%
Female Householder, No Spouse Present	22,988	66.8%	23,952	62.0%
Owner-Occupied	10,856	47.2%	10,773	45.0%
Renter-Occupied	12,132	52.8%	13,179	55.0%
Non-Family Households	110,276	39.2%	126,615	40.2%
Owner-Occupied	48,724	44.2%	53,856	42.5%
Renter-Occupied	61,552	55.8%	72,759	57.5%
Total	281,192	100.0%	314,903	100.0%

Table IV.29, below, shows housing units by type in 2010 and 2018. In 2010, there were 312,861 housing units, compared with 367,684 in 2018. Single-family units accounted for 63.0 percent of units in 2018, compared to 66.5 in 2010. Apartment units accounted for 23.8 percent in 2018, compared to 19.6 percent in 2010.

Table IV.29				
Housing Units by Type				
State of North Dakota				
2010 & 2018 Five-Year ACS Data				
Unit Type	2010 Five-Year ACS		2018 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	208,028	66.5%	231,666	63.0%
Duplex	7,192	2.3%	7,608	2.1%
Tri- or Four-Plex	12,538	4.0%	14,120	3.8%
Apartment	61,360	19.6%	87,402	23.8%
Mobile Home	23,719	7.6%	26,767	7.3%
Boat, RV, Van, Etc.	24	0%	121	0%
Total	312,861	100.0%	367,684	100.0%

Table IV.30 shows housing units by tenure from 2010 to 2018. By 2018, there were 367,684 housing units. An estimated 62.7 percent were owner-occupied, and 14.4 percent were vacant.

Table IV.30				
Housing Units by Tenure				
State of North Dakota				
2010 Census & 2018 Five-Year ACS Data				
Tenure	2010 Census		2018 Five-Year ACS	
	Units	% of Total	Units	% of Total
Occupied Housing Units	281,192	88.6%	314,903	85.6%
Owner-Occupied	183,943	65.4%	197,347	62.7%
Renter-Occupied	97,249	34.6%	117,556	37.3%
Vacant Housing Units	36,306	11.4%	52,781	14.4%
Total Housing Units	317,498	100.0%	367,684	100.0%

Households by income for the 2010 and 2018 Five-Year ACS are shown in Table IV.31. Households earning more than 100,000 dollars per year represented 27.9 percent of households in 2018, compared to 14.6 percent in 2010. Meanwhile, households earning less than 15,000 dollars accounted for 9.9 percent of households in 2018, compared to 14.3 percent in 2000.

Table IV.31				
Households by Income				
State of North Dakota				
2010 & 2018 Five-Year ACS Data				
Income	2010 Five-Year ACS		2018 Five-Year ACS	
	Households	% of Total	Households	% of Total
Less than \$15,000	39,425	14.3%	31,291	9.9%
\$15,000 to \$19,999	16,011	5.8%	13,158	4.2%
\$20,000 to \$24,999	16,678	6.0%	12,633	4.0%
\$25,000 to \$34,999	32,772	11.8%	27,910	8.9%
\$35,000 to \$49,999	41,563	15.0%	39,929	12.7%
\$50,000 to \$74,999	55,089	19.9%	57,047	18.1%
\$75,000 to \$99,999	34,795	12.6%	45,061	14.3%
\$100,000 or More	40,309	14.6%	87,874	27.9%
Total	276,642	100.0%	314,903	100.0%

Table IV.32 shows households by year home built for the 2010 and 2018 Five-Year ACS Data. Housing units built between 2000 and 2009, account for 10.4 percent of households in 2010 and 12.2 percent of households in 2018. Housing units built in 1939 or earlier represented 12.2 percent of households in 2018 and 16.1 percent of households in 2010.

Table IV.32				
Households by Year Home Built				
State of North Dakota				
2010 & 2018 Five-Year ACS Data				
Year Built	2010 Five-Year ACS		2018 Five-Year ACS	
	Households	% of Total	Households	% of Total
1939 or Earlier	44,468	16.1%	38,564	12.2%
1940 to 1949	13,577	4.9%	13,239	4.2%
1950 to 1959	29,365	10.6%	28,124	8.9%
1960 to 1969	30,162	10.9%	28,934	9.2%
1970 to 1979	61,690	22.3%	57,926	18.4%
1980 to 1989	36,021	13.0%	36,404	11.6%
1990 to 1999	32,465	11.7%	35,167	11.2%
2000 to 2009	28,894	10.4%	38,431	12.2%
2010 or Later	.	.	38,114	12.1%
Total	276,642	100.0%	314,903	100.0%

The distribution of unit types by race are shown in Table IV.33. An estimated 67.9 percent of white households occupy single-family homes, while 15.6 percent of black households do. Some 21.1 percent of white households occupied apartments, while 68.6 percent of black households do. An estimated 32.1 percent of Asian, and 60.2 percent of American Indian households occupy single-family homes.

Unit Type	White	Black	American Indian	Asian	Native Hawaiian/Pacific Islanders	Other	Two or More Races
Single-Family	67.9%	15.6%	60.2%	32.1%	44.3%	39.0%	45.7%
Duplex	1.7%	4.6%	2.5%	2.8%	0%	4.6%	5.1%
Tri- or Four-Plex	3.3%	7.3%	5.7%	7.2%	0%	5.0%	5.8%
Apartment	21.1%	68.6%	17.2%	56.2%	55.7%	41.2%	34.6%
Mobile Home	5.9%	3.8%	14.4%	1.8%	0%	10.1%	8.6%
Boat, RV, Van, Etc.	0%	0%	0.1%	0%	0%	0%	0.1%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

The disposition of vacant units between 2010 and 2018 are shown in Table IV.34. An estimated 20.4 percent of vacant units were for rent in 2010. In addition, some 7.5 percent of vacant units were for sale. "Other" vacant units represented 35.1 percent of vacant units in 2010. "Other" vacant units are not for sale or rent, or otherwise available to the marketplace. These units may be problematic if concentrated in certain areas and may create a "blighting" effect.

By 2018, for rent units accounted for 23.7 percent of vacant units, while for sale units accounted for 5.8 percent. "Other" vacant units accounted for 31.2 percent of vacant units, representing a total of 16,478 "other" vacant units.

Disposition	2010 Census		2018 Five-Year ACS	
	Units	% of Total	Units	% of Total
For Rent	7,422	20.4%	12,502	23.7%
For Sale	2,734	7.5%	3,054	5.8%
Rented Not Occupied	554	1.5%	2,694	5.1%
Sold Not Occupied	1,043	2.9%	1,297	2.5%
For Seasonal, Recreational, or Occasional Use	11,483	31.6%	15,898	30.1%
For Migrant Workers	319	0.9%	858	1.6%
Other Vacant	12,751	35.1%	16,478	31.2%
Total	36,306	100.0%	52,781	100.0%

Table IV.35, shows the number of households in the state by number of bedrooms and tenure. There were 5,912 rental households with no bedrooms, otherwise known as studio apartments. Two-bedroom households accounted for 10.4 percent of total households in the State of North Dakota. In the State of North Dakota the 117,824 households with three bedrooms accounted for

29.2 percent of all households and there were only 27,633 five-bedroom or more households, which accounted for 18.3 percent of all households.

Number of Bedrooms	Tenure			% of Total
	Own	Rent	Total	
None	370	5,912	9,158	100.0
One	3,843	27,884	38,356	2.5
Two	35,582	52,951	107,255	10.4
Three	78,845	22,320	117,824	29.2
Four	55,317	6,228	67,458	32.0
Five or more	23,390	2,261	27,633	18.3
Total	314,903	117,556	367,684	100.0

The age of a structure influences its value. As shown in Table IV.36, structures built in 1939 or earlier had a median value of 116,400 dollars while structures built between 1950 and 1959 had a median value of 158,800 dollars and those built between 1990 and 1999 had a median value of 231,600 dollars. The newest structures tended to have the highest values and those built between 2010 and 2013 and from 2014 or later had median values of 301,100 dollars and 340,000 dollars, respectively. The total median value in the State of North Dakota was 185,000 dollars.

Year Structure Built	Median Value
1939 or earlier	116,400
1940 to 1949	117,900
1950 to 1959	158,800
1960 to 1969	171,000
1970 to 1979	173,600
1980 to 1989	186,700
1990 to 1999	231,600
2000 to 2009	279,000
2010 to 2013	301,100
2014 or later	340,000
Median Value	185,000

Household mortgage status is reported in Table IV.37. In the State of North Dakota households with a mortgage accounted for 53.2 percent of all households or 104,979 housing units, and the remaining 47.1 percent or 92,992 units had no mortgage. Of those units with a mortgage, 11,263

had either a second mortgage or home equity loan, 724 had both a second mortgage and home equity loan, and 92,992 or 47.1 percent had no second mortgage or no home equity loan.

Table IV.37		
Mortgage Status		
State of North Dakota		
2018 Five-Year ACS Data		
Mortgage Status	State of North Dakota	
	Households	% of Households
Housing units with a mortgage, contract to purchase, or similar debt	104,979	53.2
With either a second mortgage or home equity loan, but not both	11,263	5.7
Second mortgage only	2,562	1.3
Home equity loan only	8,701	4.4
Both second mortgage and home equity loan	724	0.4
No second mortgage and no home equity loan	92,992	47.1
Housing units without a mortgage	92,368	46.8
Total	197,347	100.0%

Table IV.38 lists the State of North Dakota median rent as \$722 and the median home value as \$185,000.

Table IV.38	
Median Rent	
State of North Dakota	
2018 Five-Year ACS Data	
Place	Rent
Median Rent	\$722
Median Home Value	\$185,000

Home Mortgage Loans

The FFEIC The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975. Data collected under the HMDA provide a comprehensive portrait of home loan activity, including information pertaining to home purchase loans, home improvement loans, and refinancing. For the analysis only owner-occupied originated loans for single-family units were considered. As can be seen in Table IV.39, of the 14,288 loans in 2018, 8,502 loans were for Home Purchases, 972 were for Home Improvement and 3,830 were for refinancing.

Table IV.39				
Owner-Occupied Single-Family Home Loans by Loan Type				
State of North Dakota				
2008 – 2018 HMDA Data				
Year	Home Purchase	Home Improvement	Refinancing	Total
2008	6,865	1,872	6,165	14,902
2009	6,851	1,652	11,085	19,588
2010	6,753	1,488	10,289	18,530
2011	6,659	1,534	8,325	16,518
2012	8,230	1,645	11,692	21,567
2013	8,784	1,893	8,562	19,239
2014	8,925	1,605	4,081	14,611
2015	8,937	1,544	6,113	16,594
2016	8,548	1,783	6,873	17,204
2017	8,270	1,578	4,167	14,015
2018	8,502	972	3,830	14,288

Table IV.40 shows the average loan value by loan type. In 2008, average home purchase loans were 174,826 dollars in 2012 and 214,535 dollars in 2018. Overall, average loans were 112,084 dollars in 2008 and 181,225 dollars in 2018.

Table IV.40				
Owner-Occupied Single-Family Home Loans by Average Loan Amount				
State of North Dakota				
2008 – 2018 HMDA Data				
Year	Home Purchase	Home Improvement	Refinancing	Total
2008	\$130,518	\$37,867	\$114,094	\$112,084
2009	\$136,993	\$47,472	\$136,431	\$129,125
2010	\$144,221	\$47,253	\$133,951	\$130,732
2011	\$154,840	\$46,298	\$134,945	\$134,733
2012	\$174,826	\$63,840	\$145,397	\$150,406
2013	\$188,984	\$64,563	\$148,699	\$158,813
2014	\$198,683	\$52,882	\$163,113	\$172,732
2015	\$207,278	\$82,844	\$181,814	\$186,319
2016	\$211,575	\$87,211	\$189,376	\$189,817
2017	\$213,922	\$78,670	\$188,274	\$191,068
2018	\$214,535	\$55,689	\$166,285	\$181,225

Table IV.41 shows the total volume of owner-occupied single-family loans. In 2008, the total home purchase loans were 1,438,817,000 dollars in 2012 and 1,823,980,000 dollars in 2018. Overall, total loans were 1,670,281,000 dollars in 2008 and 2,589,340,000 dollars in 2018.

Table IV.41
Total Volume of Owner-Occupied Single-Family Loans
 State of North Dakota
 2008 – 2018 HMDA Data

Year	Home Purchase	Home Improvement	Refinancing	Total
2008	\$896,006,000	\$70,887,000	\$703,388,000	\$1,670,281,000
2009	\$938,536,000	\$78,423,000	\$1,512,333,000	\$2,529,292,000
2010	\$973,922,000	\$70,313,000	\$1,378,220,000	\$2,422,455,000
2011	\$1,031,080,000	\$71,021,000	\$1,123,417,000	\$2,225,518,000
2012	\$1,438,817,000	\$105,017,000	\$1,699,982,000	\$3,243,816,000
2013	\$1,660,033,000	\$122,217,000	\$1,273,161,000	\$3,055,411,000
2014	\$1,773,245,000	\$84,876,000	\$665,663,000	\$2,523,784,000
2015	\$1,852,442,000	\$127,911,000	\$1,111,426,000	\$3,091,779,000
2016	\$1,808,541,000	\$155,498,000	\$1,301,580,000	\$3,265,619,000
2017	\$1,769,138,000	\$124,141,000	\$784,536,000	\$2,677,815,000
2018	\$1,823,980,000	\$54,130,000	\$636,870,000	\$2,589,340,000

Summary

The State experienced an increase in housing production beginning in 2012. In 2018, there were 3,211 total units produced in the study area, with 1,241 of these being multi-family units. The value of single-family permits, however, has continued to rise, reaching \$242,696 in 2018. Since 2010, the study area has seen an increase in the proportion of vacant units.

B. SEGREGATION AND INTEGRATION

The “dissimilarity index” provides a quantitative measure of segregation in an area, based on the demographic composition of smaller geographic units within that area. One way of understanding the index is that it indicates how evenly two demographic groups are distributed throughout an area: if the composition of both groups in each geographic unit (e.g., Census tract) is the same as in the area as a whole (e.g., city), then the dissimilarity index score for that city will be 0. By contrast; and again, using Census tracts as an example; if one population is clustered entirely within one Census tract, the dissimilarity index score for the city will be 1. The higher the dissimilarity index value, the higher the level of segregation in an area.

Technical Note on the Dissimilarity Index Methodology

The dissimilarity indices included in this study were calculated from data provided by the Census Bureau according to the following formula:

$$D_j^{WB} = 100 * \frac{1}{2} \sum_{i=1}^N \left| \frac{W_i}{W_j} - \frac{B_i}{B_j} \right|$$

Where i indexes a geographic unit, j is the j th jurisdiction, W is group one and B is group two, and N is the number of geographic units, starting with i , in jurisdiction j .¹¹

This is the formula that HUD uses to calculate dissimilarity index values. In most respects (including the use of tract-level data available through the Brown Longitudinal Tract Database), the methodology employed in this study exactly duplicates HUD’s methodology for calculating the index of dissimilarity.

The principle exception was the decision to use Census tract-level data to calculate dissimilarity index values through 2010. While HUD uses tract level data in 1990 and 2000, HUD uses block group-level data in 2010. The decision to use tract-level data in all years included in this study was motivated by the fact that the dissimilarity index is sensitive to the geographic base unit from which it is calculated. Concretely, use of smaller geographic units produces dissimilarity index values that tend to be higher than those calculated from larger geographic units.¹²

As a general rule, HUD considers the thresholds appearing in the table below to indicate low, moderate, and high levels of segregation:

Interpreting the dissimilarity index		
Measure	Values	Description
Dissimilarity Index [range 0-100]	<40	Low Segregation
	40-54	Moderate Segregation
	>55	High Segregation

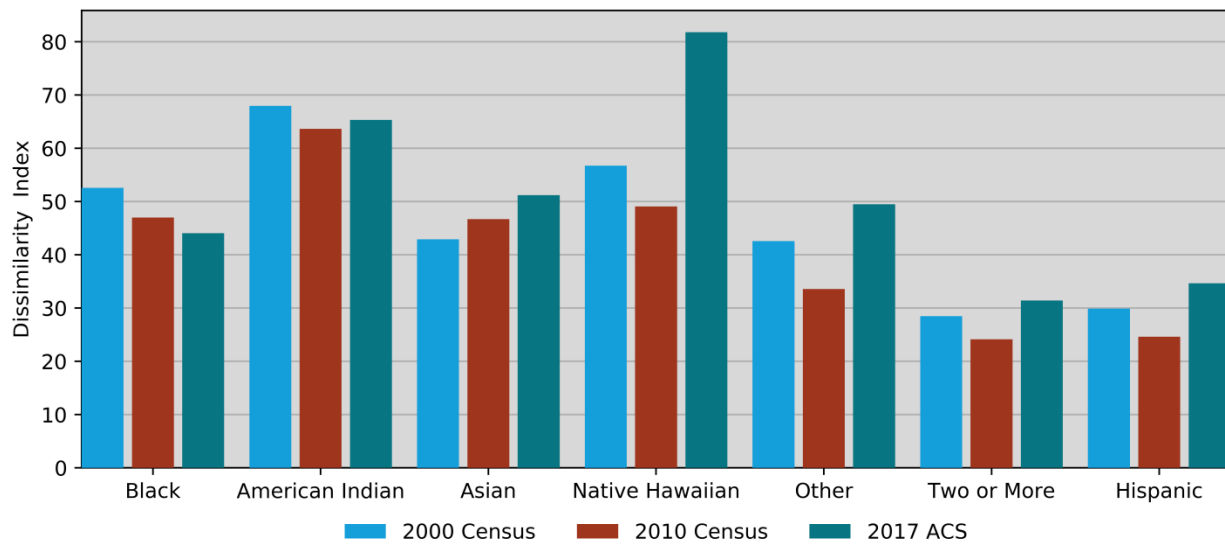
¹¹ Affirmatively Furthering Fair Housing Data Documentation. HUD. December 2015.

¹² Wong, David S. “Spatial Decomposition of Segregation Indices: A Framework Toward Measuring Segregation at Multiple Levels.” *Geographical Analyses*, 35:3. The Ohio State University. July 2003. P. 179.

Segregation Levels

Diagram IV.10 shows the rate of segregation by race and ethnicity for 2010, and 2017. During this time period, black households have had a decreasing level of segregation, ending at a moderate level of segregation. American Indian households had a high level of segregation in 2017. The level of segregation for Asian households has also increased from 2010 to 2017, resulting in a moderate level of segregation. Native Hawaiian households increased significantly in terms of segregation, according to the dissimilarity index, resulting in a high level of segregation in 2017. “Other” race households had a moderate level of segregation in 2017. Two or more race households are also seeing a rate of increase in the dissimilarity index but remain at a low level of segregation. Hispanic households had at a low level of segregation in 2017.

Diagram IV.10
Dissimilarity Index
 State of North Dakota



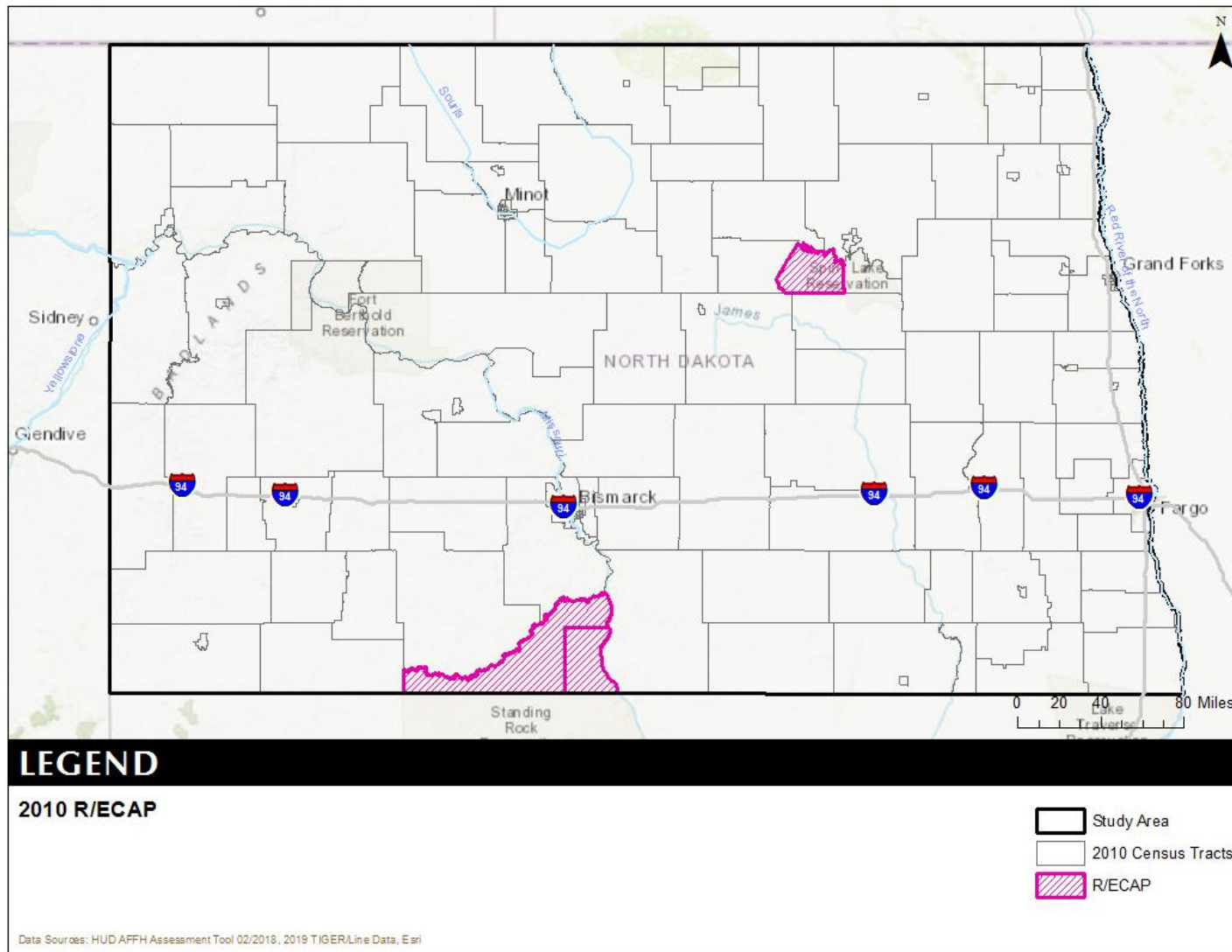
C. RACIALLY OR ETHNICALLY CONCENTRATED AREAS OF POVERTY

Racially or ethnically concentrated areas of poverty (R/ECAPs) are Census tracts with relatively high concentrations of non-white residents living in poverty. Formally, an area is designated an R/ECAP if two conditions are satisfied: first, the non-white population, whether Hispanic or non-Hispanic, must account for at least 50 percent of the Census tract population. Second, the poverty rate in that Census must exceed a certain threshold, at 40 percent.

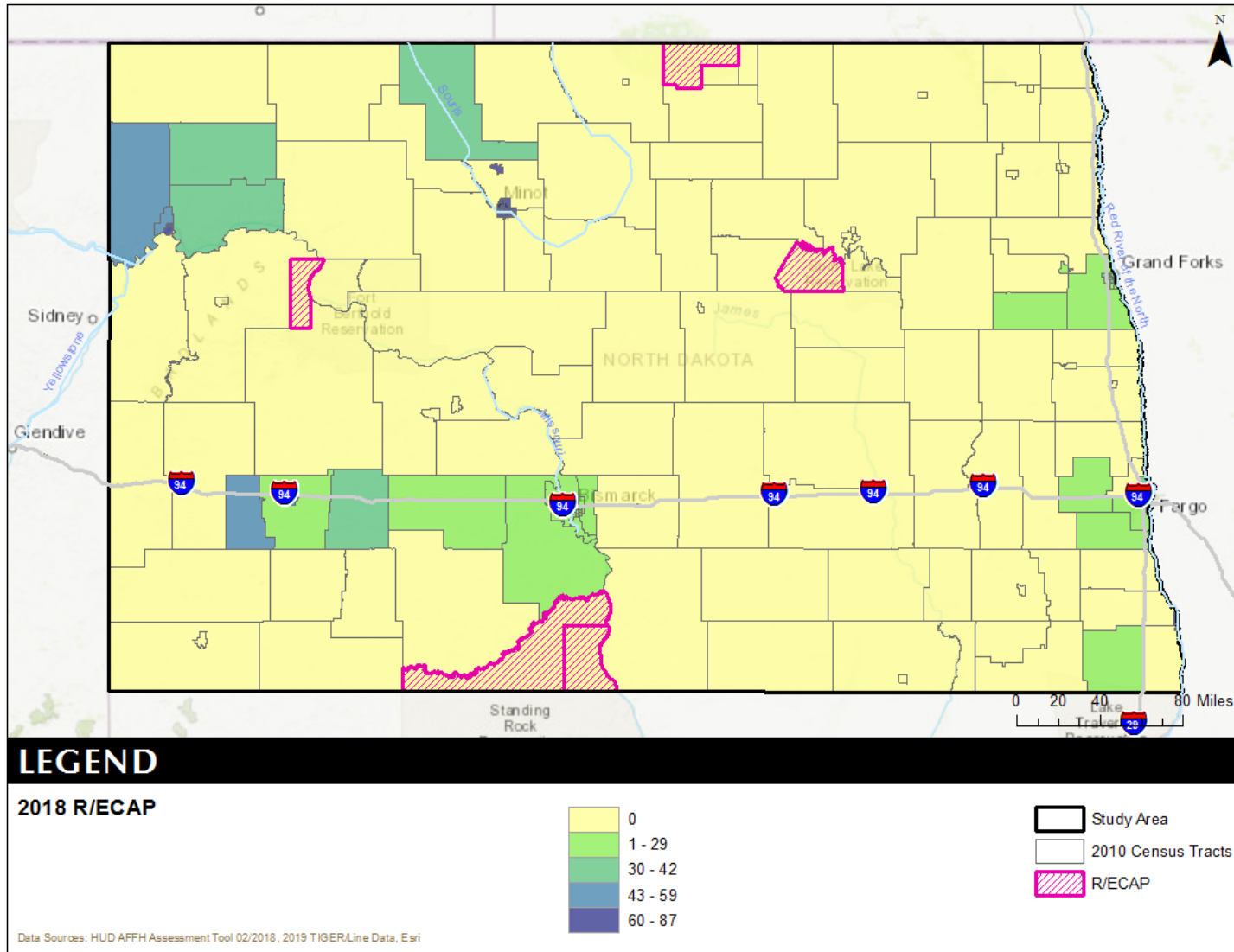
R/ECAPs over Time

There were three R/ECAPs in the State in 2010, as seen in Map IV.3. By 2018, there were five R/ECAPs in North Dakota. These R/ECAPs are primarily found in areas with higher concentrations of Native American households and in areas in and adjacent to Native American reservations.

Map IV.3
2010 R/ECAPs
State of North Dakota
2018 ACS, Tigerline



Map IV.4
2018 R/ECAPs
State of North Dakota
2018 ACS, Tigerline



D. DISPARITIES IN ACCESS TO OPPORTUNITY

The following section describes the HUD defined terms of Access to Opportunity. These measures, as outlined below, describe a set of conditions that may or may not accurately reflect the actual conditions in the study area. These data are supplemented by local data when available and ultimately provide only a piece of the total understanding of access to the various opportunities in the community. They are used as measured to compare geographic trends and levels of access within the community.

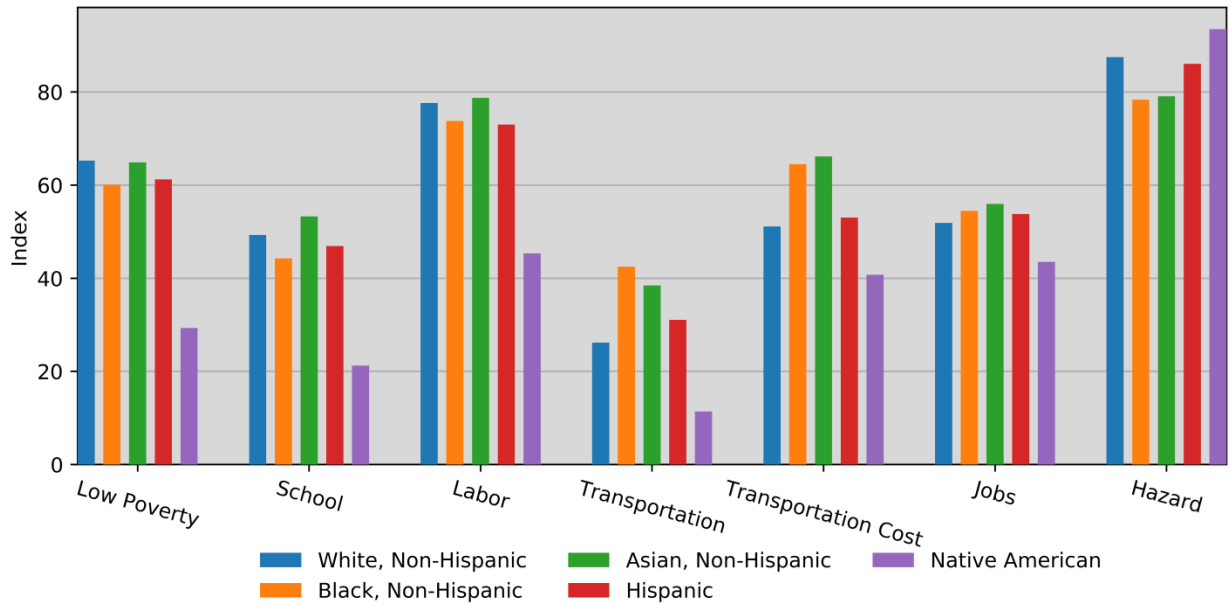
Areas of opportunity are physical places, areas within communities that provide things one needs to thrive, including quality employment, well performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes. Disparities in access to opportunity inspects whether a select group, or certain groups, have lower or higher levels of access to these community assets. HUD expresses several of these community assets through the use of an index value, with 100 representing total access by all members of the community, and zero representing no access.

The HUD opportunity indices are access to Low Poverty areas; access to School Proficiency; characterization of the Labor Market Engagement; residence in relation to Jobs Proximity; Low Transportation Costs; Transit Trips Index; and a characterization of where you live by an Environmental Health indicator. For each of these a more formal definition is as follows:

- Low Poverty – A measure of the degree of poverty in a neighborhood, at the Census tract level.
- School Proficiency - School-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing schools.
- Jobs Proximity - Quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a Core Based Statistical Area (CBSA)
- Labor Market Engagement - Provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood
- Low Transportation Cost – Estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region
- Transit Trips - Trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters
- Environmental Health - summarizes potential exposure to harmful toxins at a neighborhood level

Diagram IV.11 shows the level of access to opportunities by race and ethnicity. Native American households have lower access to Low Poverty areas, compared to other races and ethnicities in the State. Native American households also have markedly lower access to school proficiency. Native American households have lower access to labor market engagement and transit trips. There is little variance by race for access to transportation cost. There is little variance by race or ethnicity to job proximity and environmental health.

Diagram IV.11
Access to Opportunity
 State of North Dakota

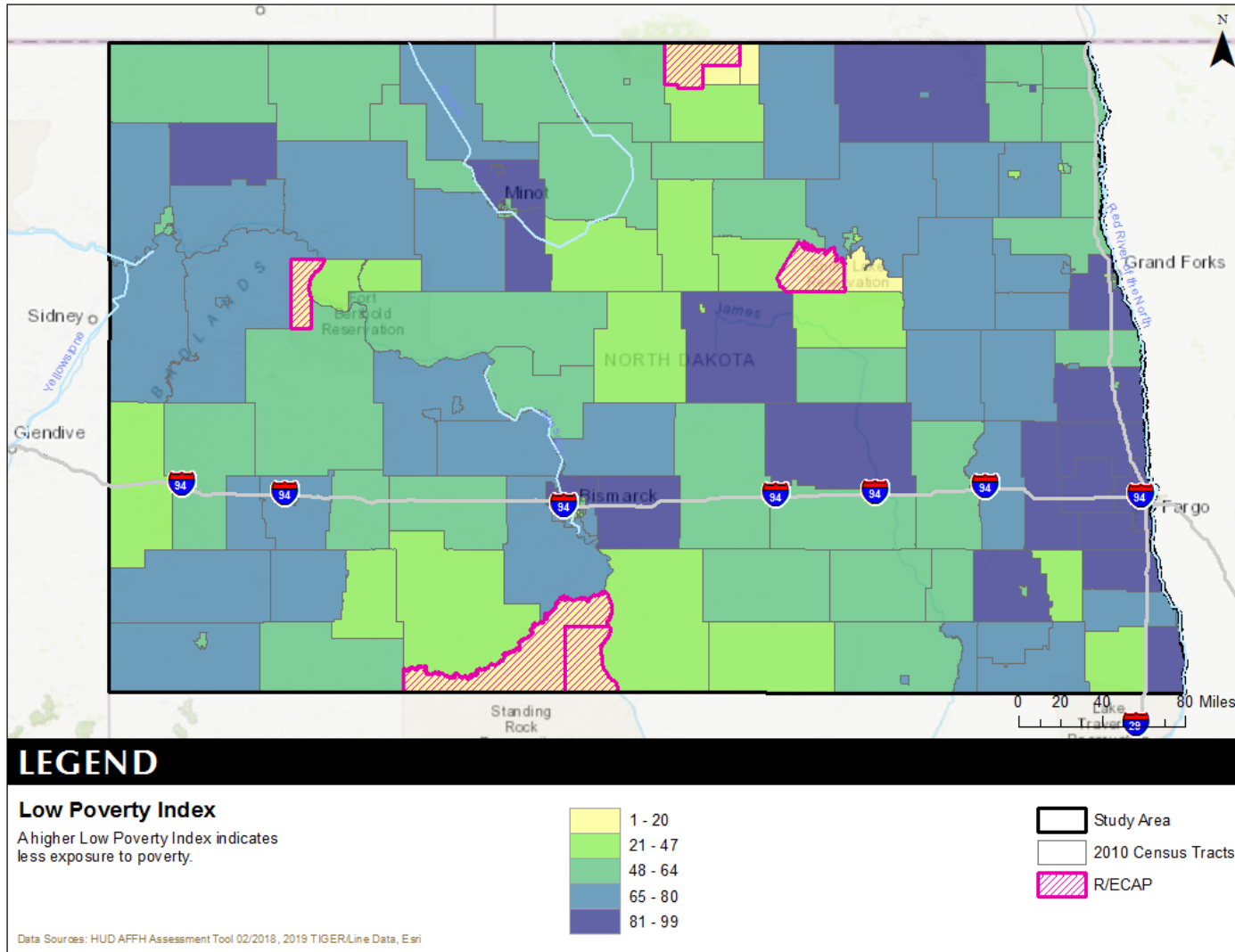


LOW POVERTY INDEX

The Low Poverty Index uses rates of family poverty by household (based on the federal poverty line) to measure exposure to poverty by neighborhood. A higher score is more desirable, generally indicating less exposure to poverty at the neighborhood level.

The highest scores were found in the more urban areas of the State. Conversely, the lowest scores were scattered in the more rural parts of the State.

Map IV.5
Low Poverty
 State of North Dakota
 HUD AFFH Database



SCHOOL PROFICIENCY INDEX

The School Proficiency Index measures the proficiency of elementary schools in the attendance area (where this information is available) of individuals sharing a protected characteristic or the proficiency of elementary schools within 1.5 miles of individuals with a protected characteristic where attendance boundary data are not available. The values for the School Proficiency Index are determined by the performance of 4th grade students on state exams.

The highest School Proficiency indices were scattered throughout the State, as well as areas of the larger cities in North Dakota. Areas scattered throughout the more rural areas of the State had the lowest school proficiencies, according to the School Proficiency Index.

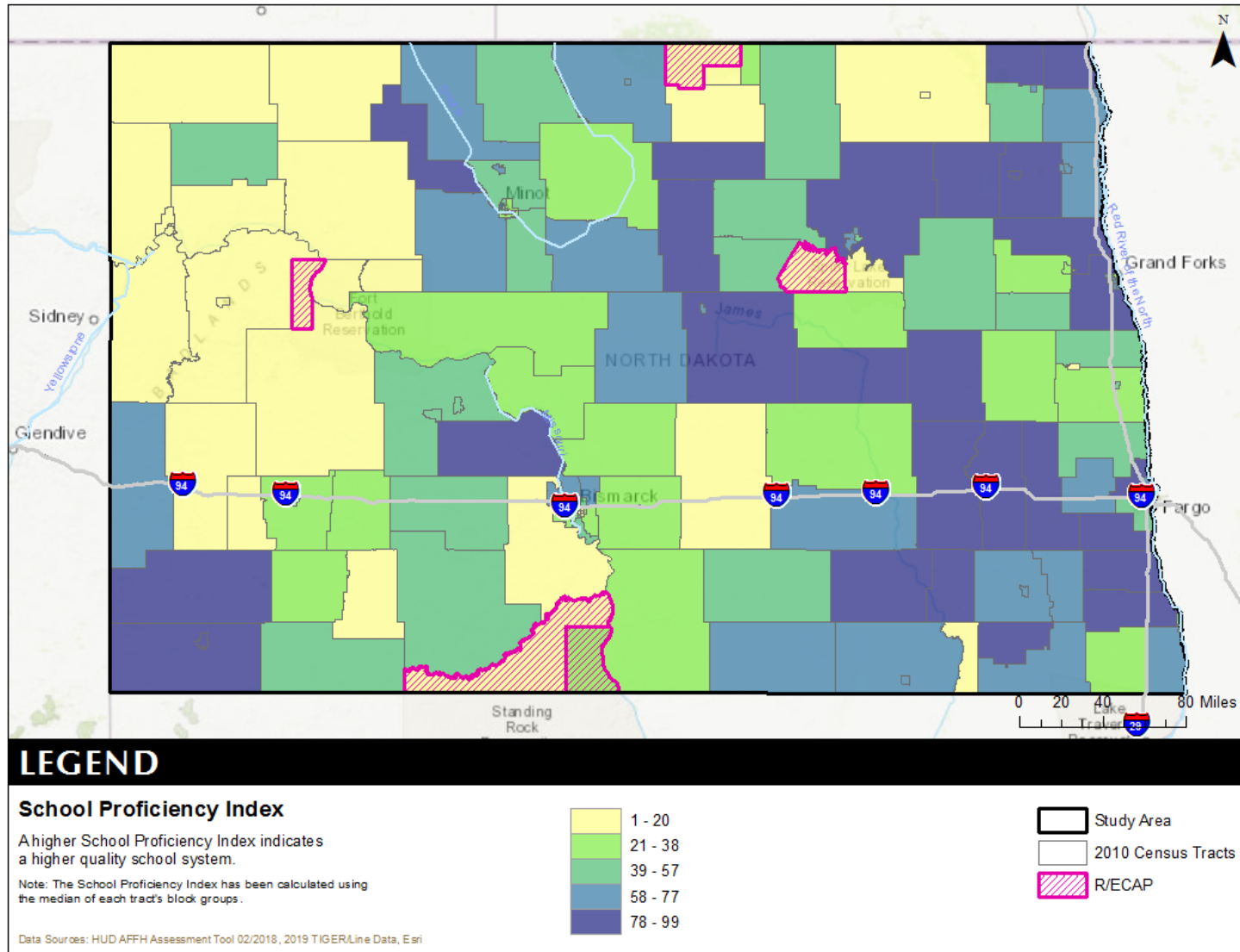
JOBS PROXIMITY INDEX

The Jobs Proximity Index measures the physical distances between place of residence and jobs and is shown in Map IV.7. Job proximity varied widely across the State. As one would expect, the areas closest to the city centers of Bismarck, Grand Forks, and Fargo, had the highest job proximity index ratings.

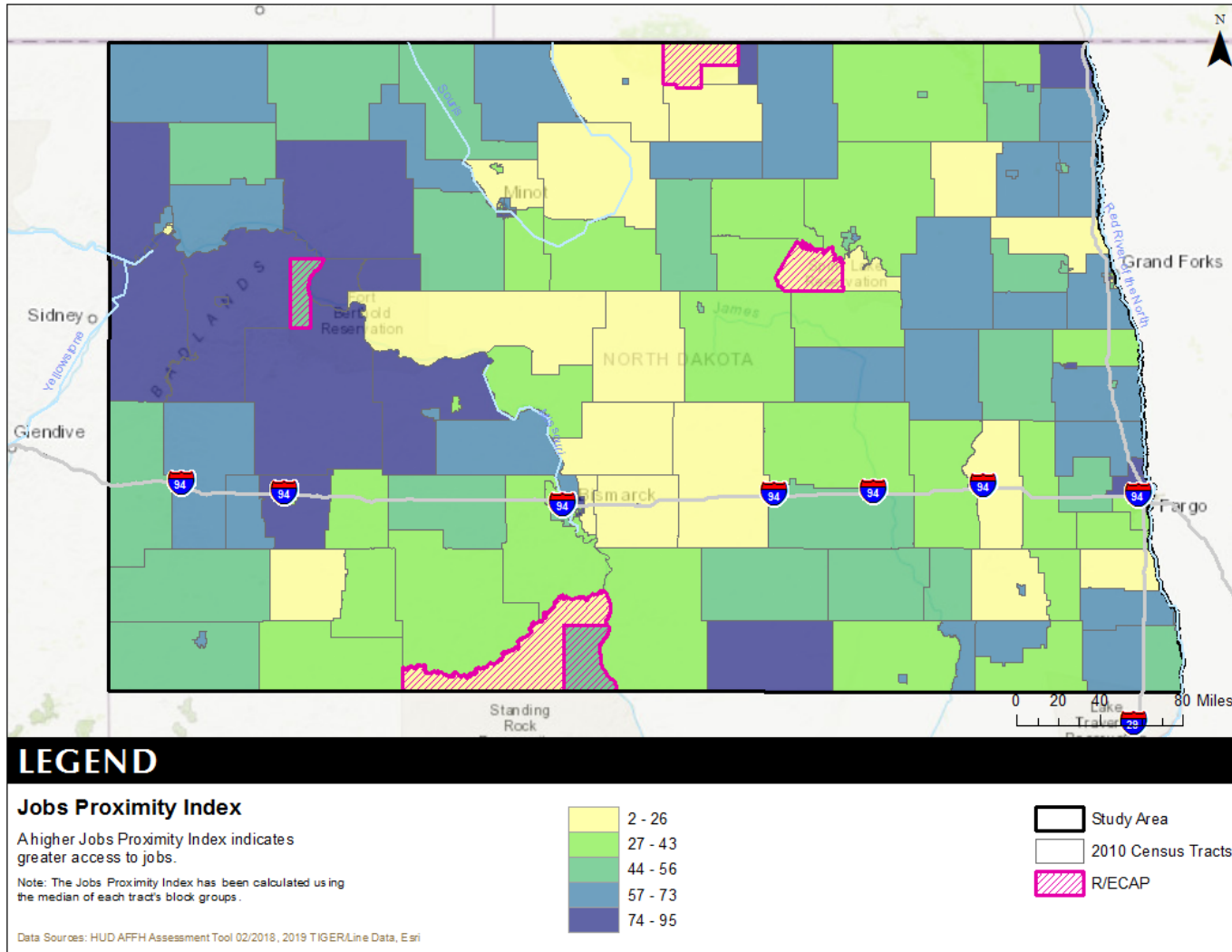
LABOR MARKET ENGAGEMENT INDEX

The Labor Market Engagement Index provides a measure of unemployment rate, labor-force participation rate, and percent of the population ages 25 and above with at least a bachelor's degree, by neighborhood Map IV.8 shows the labor market engagement for the study area. Areas around Bismarck, Grand Forks, and Fargo had the highest rates of labor market engagement.

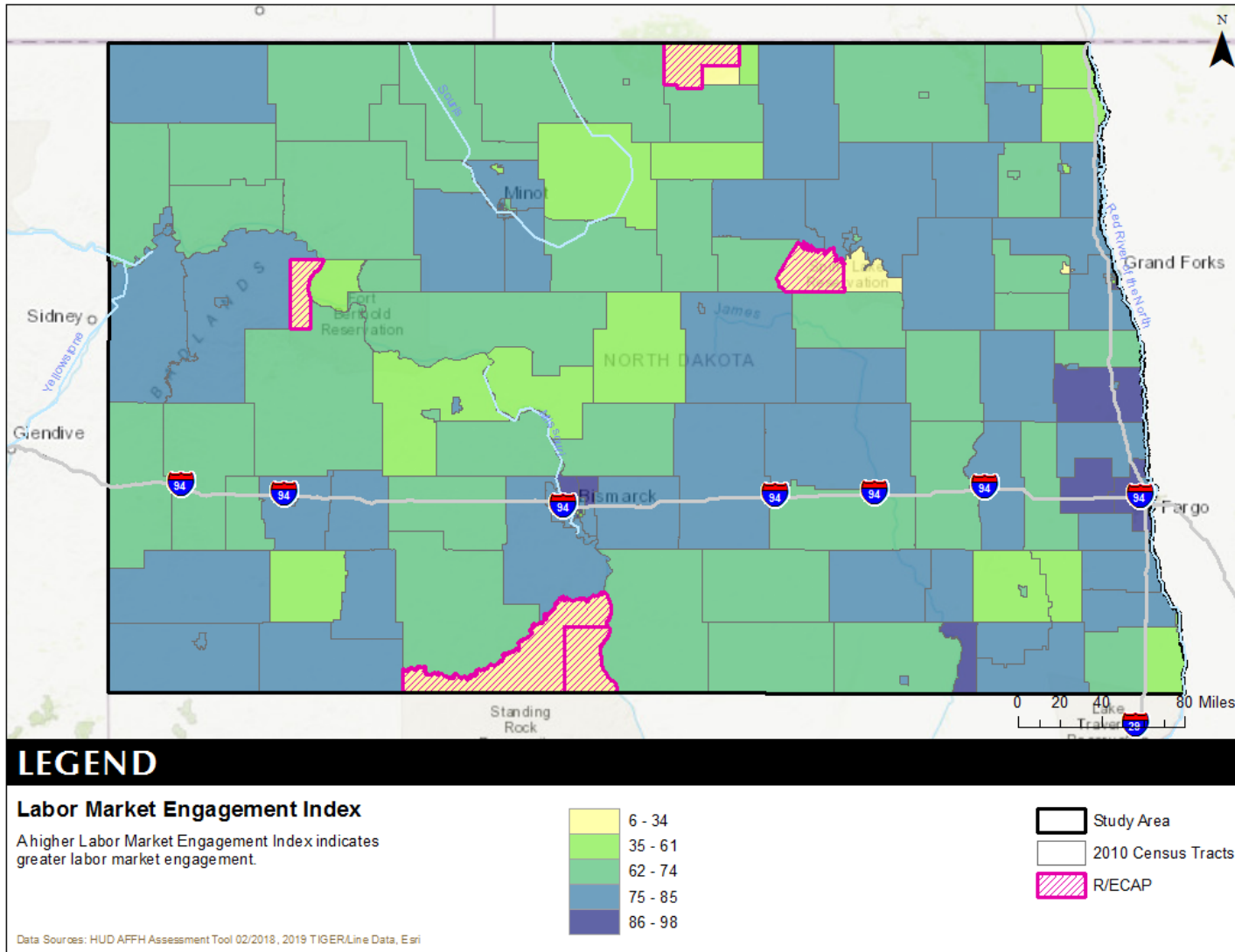
Map IV.6
School Proficiency
 State of North Dakota
 HUD AFFH Database



Map IV.7
Job Proximity
 State of North Dakota
 HUD AFFH Database



Map IV.8
Labor Market Engagement
 State of North Dakota
 HUD AFFH Database



TRANSPORTATION TRIP INDEX

The Transportation Trip Index measures proximity to public transportation by neighborhood. There was little difference in index rating across racial and ethnic groups. The Transportation Trip Index measures proximity to public transportation by neighborhood. The Transit Trips Index measures how often low-income families in a neighborhood use public transportation. The highest rate of transit trips were in pockets in the western parts of the State, while the lowest ratings were in the more rural parts of the State.

LOW TRANSPORTATION COST INDEX

The Low Transportation Cost Index measures cost of transport and proximity to public transportation by neighborhood. Transportation Costs saw a similar pattern as with Transit Trips; the highest transportation cost index ratings were in the more urban parts of the State, while lower index ratings were in the rural parts of the study area.

ENVIRONMENTAL HEALTH INDEX

The Environmental Health Index measures exposure based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins by neighborhood.

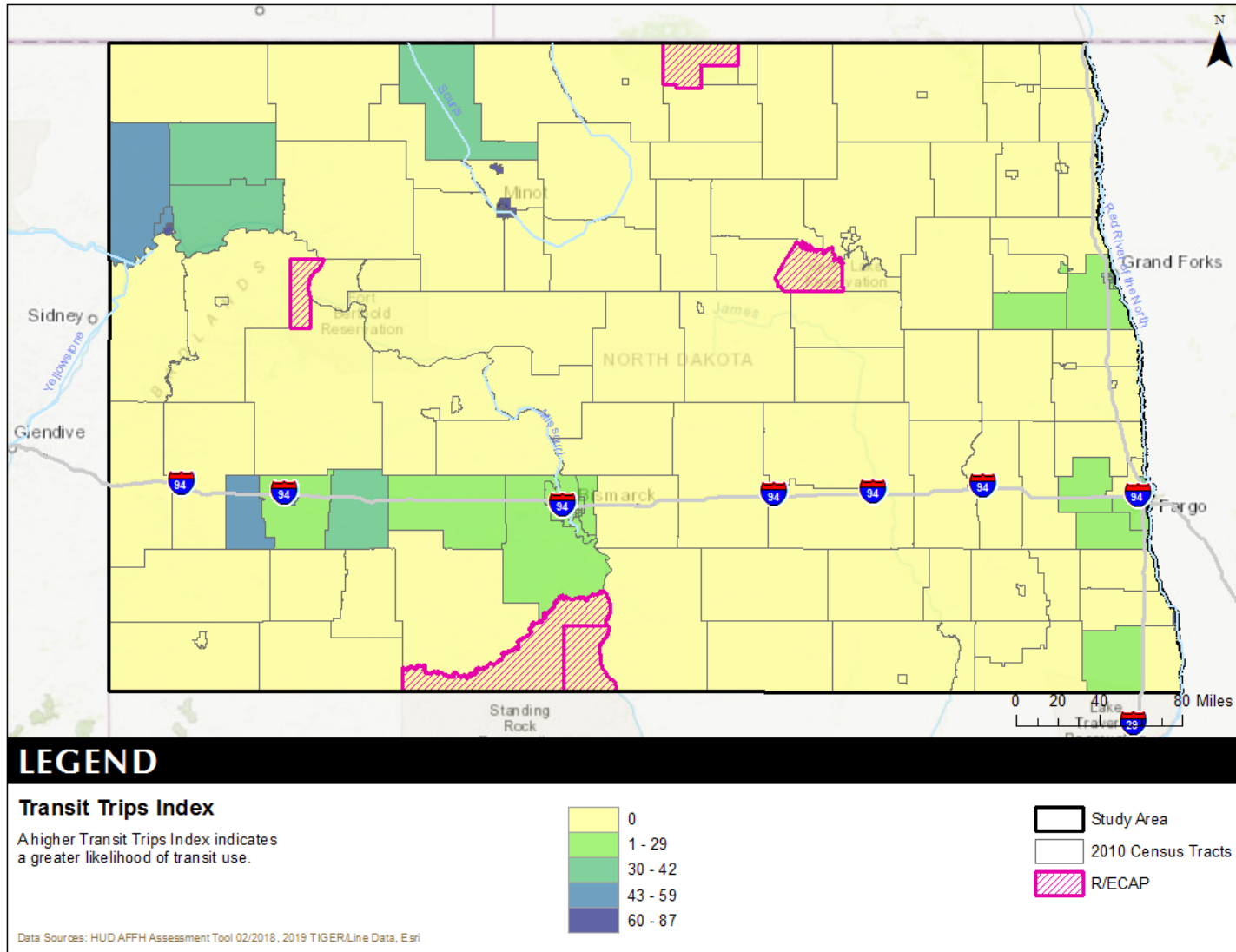
The majority of the State had the highest environmental health index ratings.

PATTERNS IN DISPARITIES IN ACCESS TO OPPORTUNITY

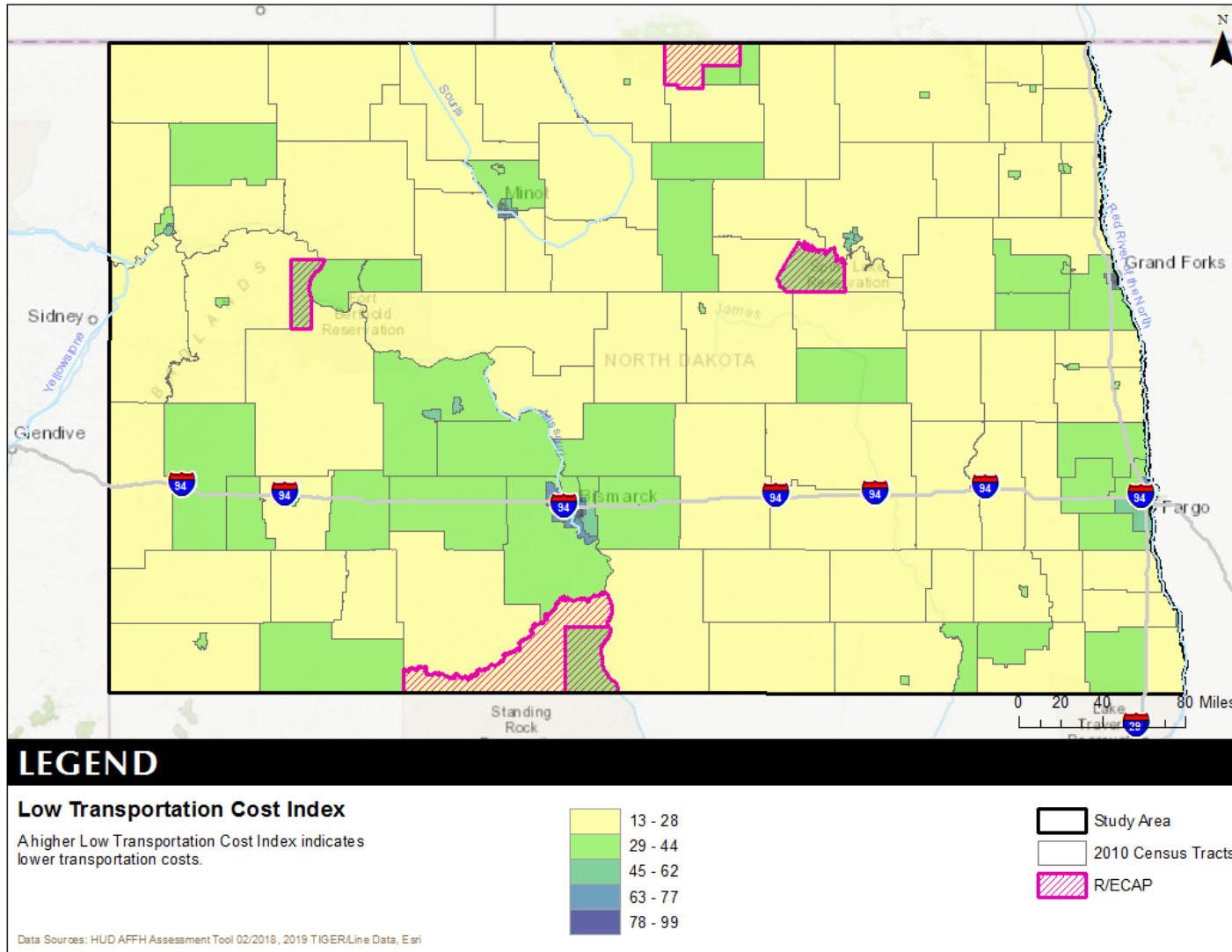
The degree to which residents had access to low poverty areas, school proficiency, and labor market engagement differed depending on their race or ethnicity, particularly resulting in lower index ratings for Native American households in the State of North Dakota. Other measures of opportunity (transportation costs, and environmental quality) did not differ dramatically by race or ethnicity.

Map IV.9 Transit Trips

State of North Dakota
HUD AFFH Database



Map IV.10
Transportation Cost
 State of North Dakota
 HUD AFFH Database



Map IV.11
Environmental Health
State of North Dakota
HUD AFFH Database



E. DISPROPORTIONATE HOUSING NEEDS

The Census Bureau collects data on several topics that HUD has identified as “housing problems”. For the purposes of this report, housing problems include overcrowding, incomplete plumbing or kitchen facilities, and cost-burden.

Overcrowding is defined as having from 1.1 to 1.5 people per room per residence, with severe overcrowding defined as having more than 1.5 people per room. Households with overcrowding are shown in Table IV.50. In 2017, an estimated 1.3 percent of households were overcrowded, and an additional 0.7 percent were severely overcrowded.

Table IV.50							
Overcrowding and Severe Overcrowding							
State of North Dakota							
2010 & 2018 Five-Year ACS Data							
Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2010 Five-Year ACS	182,789	99.3%	1,159	0.6%	169	0.1%	184,117
2018 Five-Year ACS	195,551	99.1%	1,535	0.8%	261	0.1%	197,347
Renter							
2010 Five-Year ACS	90,894	98.2%	1,258	1.4%	373	0.4%	92,525
2018 Five-Year ACS	112,995	96.1%	2,576	2.2%	1,985	1.7%	117,556
Total							
2010 Five-Year ACS	273,683	98.9%	2,417	0.9%	542	0.2%	276,642
2018 Five-Year ACS	308,546	98.0%	4,111	1.3%	2,246	0.7%	314,903

Incomplete plumbing and kitchen facilities are another indicator of potential housing problems. According to the Census Bureau, a housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower. Likewise, a unit is categorized as deficient when any of the following are missing from the kitchen: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator. This data is displayed in Table IV.51 and Table IV.52.

There were a total of 1,152 households with incomplete plumbing facilities in 2018, representing 0.4 percent of households in the State of North Dakota. This is compared to 0.3 percent of households lacking complete plumbing facilities in 2010.

Table IV.51		
Households with Incomplete Plumbing Facilities		
2010 and 2018 Five-Year ACS Data		
Households	2010 Five-Year ACS	2018 Five-Year ACS
With Complete Plumbing Facilities	275,922	313,751
Lacking Complete Plumbing Facilities	720	1,152
Total Households	276,642	314,903
Percent Lacking	0.3%	0.4%

There were 2,173 households lacking complete kitchen facilities in 2018, compared to 1,748 households in 2010. This was a change from 0.6 percent of households in 2010 to 0.7 percent in 2018.

Table IV.52		
Households with Incomplete Kitchen Facilities		
State of North Dakota		
2010 and 2018 Five-Year ACS Data		
Households	2010 Five-Year ACS	2018 Five-Year ACS
With Complete Kitchen Facilities	274,894	312,730
Lacking Complete Kitchen Facilities	1,748	2,173
Total Households	276,642	314,903
Percent Lacking	0.6%	0.7%

Cost burden is defined as gross housing costs that range from 30.0 to 50.0 percent of gross household income; severe cost burden is defined as gross housing costs that exceed 50.0 percent 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 and selected electricity and natural gas energy charges.

As seen in Table IV.53, in the State of North Dakota, 12.1 percent of households had a cost burden and 9.5 percent had a severe cost burden. Some 18.4 percent of renters were cost burdened, and 17.3 percent were severely cost burdened. Owner-occupied households without a mortgage had a cost burden rate of 4.8 percent and a severe cost burden rate of 4.3 percent. Owner occupied households with a mortgage had a cost burden rate of 11.5 percent, and severe cost burden at 5.3 percent.

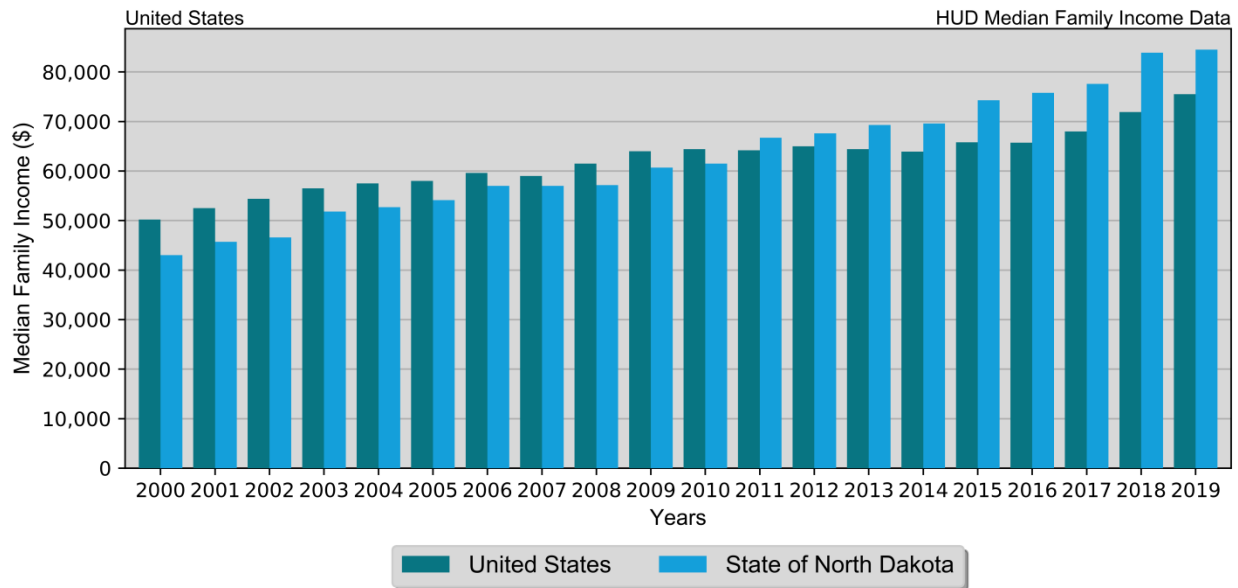
Table IV.53									
Cost Burden and Severe Cost Burden by Tenure									
State of North Dakota									
2010 & 2018 Five-Year ACS Data									
Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2010 Five-Year ACS	78,485	78.0%	15,888	15.8%	5,981	5.9%	266	0.3%	100,620
2018 Five-Year ACS	87,060	82.9%	12,073	11.5%	5,573	5.3%	273	0.3%	104,979
Owner Without a Mortgage									
2010 Five-Year ACS	72,750	87.1%	5,927	7.1%	4,307	5.2%	513	0.6%	83,497
2018 Five-Year ACS	83,032	89.9%	4,466	4.8%	3,968	4.3%	902	1.0%	92,368
Renter									
2010 Five-Year ACS	49,269	53.2%	16,711	18.1%	17,299	18.7%	9,246	10.0%	92,525
2018 Five-Year ACS	66,261	56.4%	21,605	18.4%	20,358	17.3%	9,332	7.9%	117,556
Total									
2010 Five-Year ACS	200,504	72.5%	38,526	13.9%	27,587	10.0%	10,025	3.6%	276,642
2018 Five-Year ACS	236,353	75.1%	38,144	12.1%	29,899	9.5%	10,507	3.3%	314,903

Housing Problems by Income

Very low-income renters are those who earn less than 50 percent of the area median income (AMI), and include a significant proportion of extremely low-income renters (who earn less than 30 percent of AMI). Households with worst case needs are defined as very low-income renters who do not receive government housing assistance and who pay more than 50 percent of their income for rent, live in severely inadequate conditions, or both. Table IV.54 shows that the HUD estimated MFI for the State of North Dakota was \$83,900 in 2018. Diagram IV.13, illustrates the estimated MFI for 2000 through 2018.

Table IV.54 Median Family Income State of North Dakota 2000–2018 HUD MFI	
Year	State of North Dakota MFI
2000	43,000
2001	45,700
2002	46,600
2003	51,800
2004	52,700
2005	54,100
2006	57,000
2007	57,000
2008	57,150
2009	60,700
2010	61,500
2011	66,700
2012	67,600
2013	69,300
2014	69,600
2015	74,300
2016	75,800
2017	77,600
2018	83,900

Diagram IV.13
Estimated Median Family Income
State of North Dakota vs. United States
HUD Data: 2000 - 2019



Housing Problems by Income, Race, and Tenure

The following tables show households with housing problems by race/ethnicity. These tables can be used to determine if there is a disproportionate housing need for any racial or ethnic groups. If any racial/ethnic group faces housing problems at a rate of ten percentage points or high than the jurisdiction average, then they have a disproportionate share of housing problems. Housing problems are defined as any household that has overcrowding, inadequate kitchen or plumbing facilities, or are cost burdened (pay more than 30 percent of their income on housing).

Overall, there are 67,072 households with housing problems in the State of North Dakota. This includes 2,645 black households, 957 Asian households, 3,895 American Indian, 15 Pacific Islander, and 1,330 “other” race households with housing problems. As for ethnicity, there are 2,660 Hispanic households with housing problems. This is shown in Table IV.56. Black, American Indian, and Hispanic households face a disproportionate rate of housing problems at rates of 50.7 percent, 35.0 percent, and 40.6 percent, respectively. This is compared to the State average of 22.0 percent.

Table IV.55								
Percent of Total Households with Housing Problems by Income and Race								
State of North Dakota 2012–2016 HUD CHAS Data								
Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
\$0 to \$25,350	70.7%	80.6%	65.1%	65.8%	100.0%	66.2%	82.4%	70.9%
\$25,351 to \$42,250	47.2%	62.6%	66.7%	45.3%	0%	63.6%	64.2%	48.7%
\$42,251 to \$67,600	20.6%	23.1%	23.9%	16.3%	0%	25.4%	32.4%	21.0%
\$67,601 to \$84,500	9.9%	38.2%	4.6%	6.1%	0%	15.7%	10.8%	10.0%
Above \$84,500	3.1%	15.6%	8.1%	7.0%	0%	6.3%	11.6%	3.4%
Total	20.2%	50.7%	30.8%	35.0%	37.5%	30.7%	40.6%	22.0%
Without Housing Problems								
\$0 to \$25,350	22.6%	10.2%	10.9%	24.7%	0%	32.7%	11.7%	22.0%
\$25,351 to \$42,250	52.8%	37.4%	33.3%	54.7%	0%	36.4%	35.8%	51.3%
\$42,251 to \$67,600	79.4%	76.9%	76.1%	83.7%	0%	74.6%	67.6%	79.0%
\$67,601 to \$84,500	90.1%	61.8%	95.4%	93.9%	100.0%	84.3%	89.2%	90.0%
Above \$84,500	96.9%	84.4%	91.9%	93.0%	100.0%	93.7%	88.4%	96.6%
Total	79.0%	46.5%	64.2%	61.8%	62.5%	69.2%	58.2%	77.1%

Diagram IV.14
Total Housing Problems by Race
 State of North Dakota
 Total

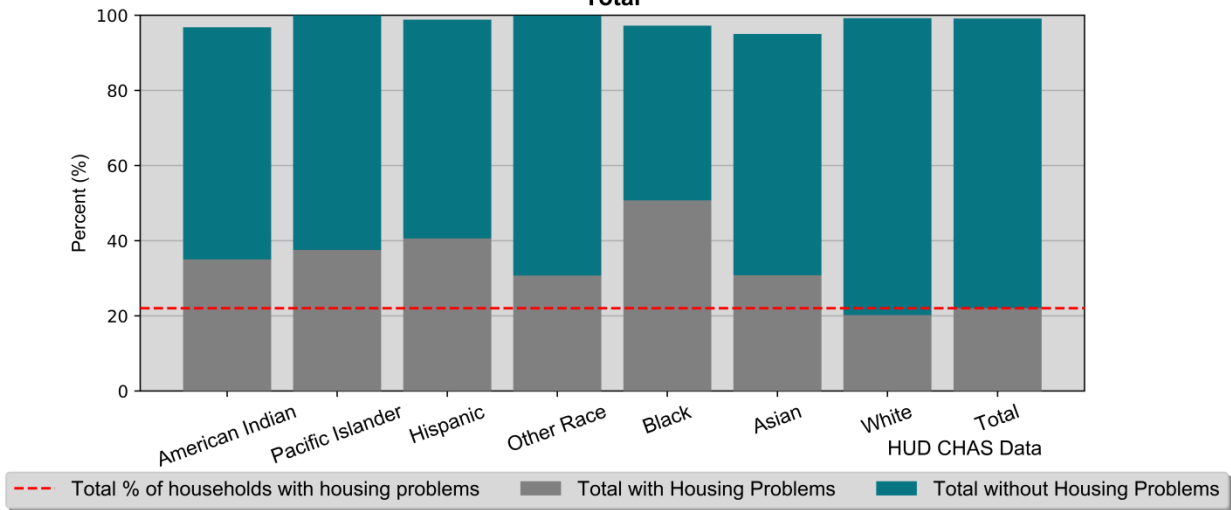


Table IV.56 Total Households with Housing Problems by Income and Race State of North Dakota 2012–2016 HUD CHAS Data								
Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
\$0 to \$25,350	23,005	1,310	420	2,465	15	485	1,095	28,795
\$25,351 to \$42,250	14,900	820	320	865	0	420	735	18,060
\$42,251 to \$67,600	10,630	295	94	335	0	255	565	12,174
\$67,601 to \$84,500	3,120	105	8	60	0	80	70	3,443
Above \$84,500	3,915	115	115	170	0	90	195	4,600
Total	55,570	2,645	957	3,895	15	1,330	2,660	67,072
Total								
\$0 to \$25,350	32,535	1,625	645	3,745	15	733	1,329	40,627
\$25,351 to \$42,250	31,595	1,310	480	1,910	0	660	1,145	37,100
\$42,251 to \$67,600	51,545	1,275	394	2,050	0	1,005	1,745	58,014
\$67,601 to \$84,500	31,665	275	173	990	10	510	650	34,273
Above \$84,500	127,480	735	1,415	2,420	15	1,430	1,680	135,175
Total	274,820	5,220	3,107	11,115	40	4,338	6,549	305,189

In the State of North Dakota, 235 black homeowner households face housing problems, 108 Asian households, and 640 Hispanic homeowner households face housing problems.

Table IV.57
Percent of Homeowner Households with Housing Problems by Income and Race

State of North Dakota
2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
\$0 to \$25,350	64.1%	100.0%	62.5%	55.7%	0%	31.4%	77.9%	63.3%
\$25,351 to \$42,250	35.0%	93.1%	77.8%	21.0%	0%	78.8%	46.3%	35.7%
\$42,251 to \$67,600	20.5%	55.6%	5.1%	13.3%	0%	18.6%	26.8%	20.5%
\$67,601 to \$84,500	10.7%	0%	9.1%	3.4%	0%	6.9%	6.8%	10.5%
Above \$84,500	2.5%	12.0%	2.1%	5.1%	0%	3.9%	12.5%	2.7%
Total	13.1%	46.5%	11.2%	18.5%	0%	16.0%	24.0%	13.5%
Without Housing Problems								
\$0 to \$25,350	28.8%	0%	37.5%	34.4%	0%	66.0%	20.1%	29.5%
\$25,351 to \$42,250	65.0%	6.9%	22.2%	79.0%	0%	21.2%	53.7%	64.3%
\$42,251 to \$67,600	79.5%	44.4%	94.9%	86.7%	0%	81.4%	73.2%	79.5%
\$67,601 to \$84,500	89.3%	0%	90.9%	96.6%	0%	93.1%	93.2%	89.5%
Above \$84,500	97.5%	88.0%	97.9%	94.9%	100.0%	96.1%	87.5%	97.3%
Total	86.4%	53.5%	88.8%	79.6%	100.0%	83.8%	75.8%	86.0%

Diagram IV.15
Owner Housing Problems by Race
 State of North Dakota
 Owners

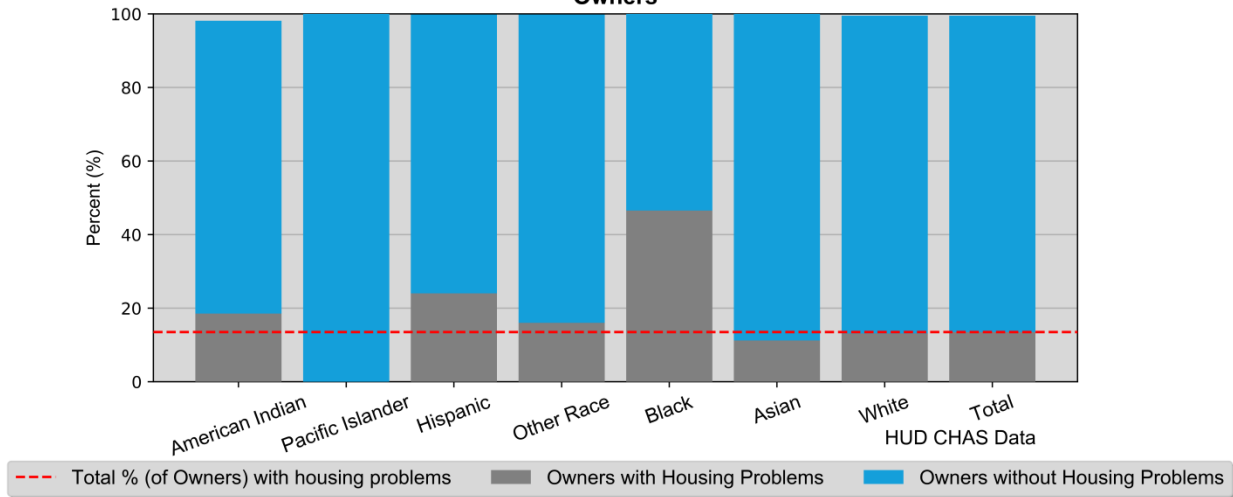


Table IV.58
Homeowner Households with Housing Problems by Income and Race
 State of North Dakota
 2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
\$0 to \$25,350	7,590	20	50	535	0	50	155	8,400
\$25,351 to \$42,250	5,425	135	35	145	0	130	125	5,995
\$42,251 to \$67,600	5,990	50	4	120	0	55	200	6,419
\$67,601 to \$84,500	2,275	0	4	20	0	10	25	2,334
Above \$84,500	2,680	30	15	90	0	40	135	2,990
Total	23,960	235	108	910	0	285	640	26,138
Total								
\$0 to \$25,350	11,850	20	80	960	0	159	199	13,268
\$25,351 to \$42,250	15,480	145	45	690	0	165	270	16,795
\$42,251 to \$67,600	29,240	90	79	905	0	295	745	31,354
\$67,601 to \$84,500	21,170	0	44	595	0	145	370	22,324
Above \$84,500	105,320	250	715	1,780	15	1,015	1,080	110,175
Total	183,060	505	963	4,930	15	1,779	2,664	193,916

In total, some 40,934 renter households face housing problems in the State of North Dakota. Of these, some 2,410 black households, 849 Asian households, and 2,020 Hispanic renter households face housing problems.

Table IV.59 Renter Households with Housing Problems by Income and Race State of North Dakota 2012–2016 HUD CHAS Data								
Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
\$0 to \$25,350	15,415	1,290	370	1,930	15	435	940	20,395
\$25,351 to \$42,250	9,475	685	285	720	0	290	610	12,065
\$42,251 to \$67,600	4,640	245	90	215	0	200	365	5,755
\$67,601 to \$84,500	845	105	4	40	0	70	45	1,109
Above \$84,500	1,235	85	100	80	0	50	60	1,610
Total	31,610	2,410	849	2,985	15	1,045	2,020	40,934
Total								
\$0 to \$25,350	20,685	1,605	565	2,785	15	574	1,130	27,359
\$25,351 to \$42,250	16,115	1,165	435	1,220	0	495	875	20,305
\$42,251 to \$67,600	22,305	1,185	315	1,145	0	710	1,000	26,660
\$67,601 to \$84,500	10,495	275	129	395	10	365	280	11,949
Above \$84,500	22,160	485	700	640	0	415	600	25,000
Total	91,760	4,715	2,144	6,185	25	2,559	3,885	111,273

Diagram IV.16
Renter Housing Problems by Race
State of North Dakota
Renters

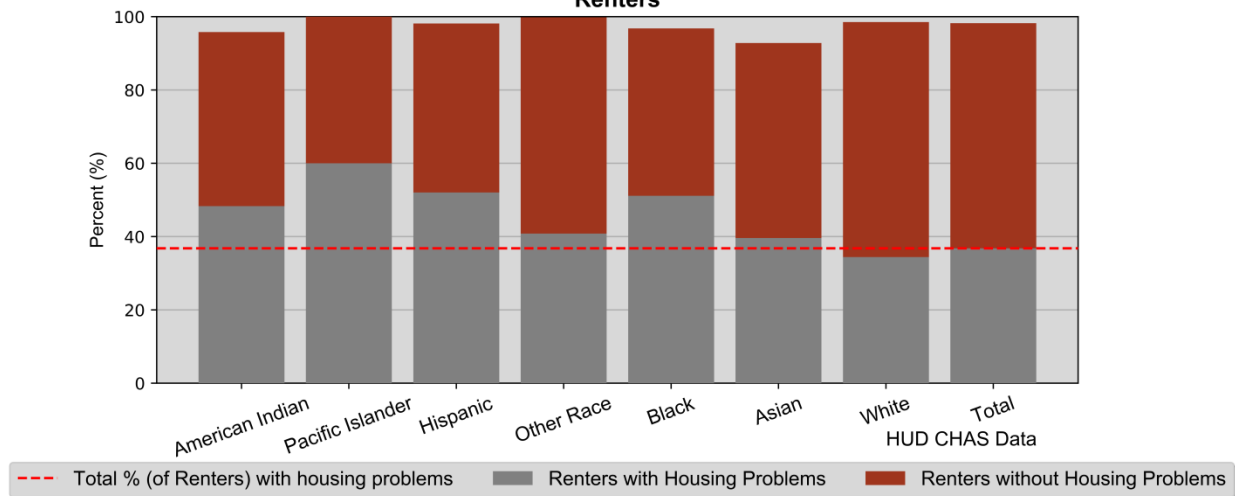


Table IV.60
Percent of Renter Households with Housing Problems by Income and Race

State of North Dakota
 2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With Housing Problems								
\$0 to \$25,350	74.5%	80.4%	65.5%	69.3%	100.0%	75.8%	83.2%	74.5%
\$25,351 to \$42,250	58.8%	58.8%	65.5%	59.0%	0%	58.6%	69.7%	59.4%
\$42,251 to \$67,600	20.8%	20.7%	28.6%	18.8%	0%	28.2%	36.5%	21.6%
\$67,601 to \$84,500	8.1%	38.2%	3.1%	10.1%	0%	19.2%	16.1%	9.3%
Above \$84,500	5.6%	17.5%	14.3%	12.5%	0%	12.0%	10.0%	6.4%
Total	34.4%	51.1%	39.6%	48.3%	60.0%	40.8%	52.0%	36.8%
Without Housing Problems								
\$0 to \$25,350	19.1%	10.3%	7.1%	21.4%	0%	23.5%	10.2%	18.3%
\$25,351 to \$42,250	41.2%	41.2%	34.5%	41.0%	0%	41.4%	30.3%	40.6%
\$42,251 to \$67,600	79.2%	79.3%	71.4%	81.2%	0%	71.8%	63.5%	78.4%
\$67,601 to \$84,500	91.9%	61.8%	96.9%	89.9%	100.0%	80.8%	83.9%	90.7%
Above \$84,500	94.4%	82.5%	85.7%	87.5%	0%	88.0%	90.0%	93.6%
Total	64.1%	45.7%	53.2%	47.5%	40.0%	59.0%	46.1%	61.4%

These racial/ethnic groups were also disproportionately impacted by severe housing problems, as seen in Table IV.61. Severe housing problems include overcrowding at a rate of more than 1.5 persons per room and housing costs exceeding 50 percent of the household income. Some 1,810 black homeowner households face severe housing problems, as well as 609 Asian homeowner households, and 380 Hispanic homeowner households.

Table IV.61
Percent of Homeowner Households with Severe Housing Problems by Income and Race

State of North Dakota
 2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With A Severe Housing Problem								
\$0 to \$25,350	41.3%	100.0%	53.3%	40.8%	0%	29.2%	60.3%	41.6%
\$25,351 to \$42,250	13.8%	86.2%	77.8%	10.1%	0%	21.2%	22.2%	14.6%
\$42,251 to \$67,600	4.4%	55.6%	0%	7.2%	0%	0%	8.8%	4.7%
\$67,601 to \$84,500	2.9%	0%	0%	1.7%	0%	2.6%	2.7%	2.8%
Above \$84,500	1.0%	0%	0%	5.1%	0%	2.5%	11.6%	1.1%
Total	5.4%	38.6	7.8%	12.7%	0%	6.1%	14.3%	5.8%
Without A Severe Housing Problem								
\$0 to \$25,350	51.6%	0%	46.7%	49.2%	0%	68.2%	37.7%	51.3%
\$25,351 to \$42,250	86.2%	13.8%	22.2%	89.9%	0%	78.8%	77.8%	85.4%
\$42,251 to \$67,600	95.6%	44.4%	100.0%	92.8%	0%	100.0%	91.2%	95.3%
\$67,601 to \$84,500	97.1%	0%	100.0%	98.3%	0%	97.4%	97.3%	97.2%
Above \$84,500	99.0%	100.0%	100.0%	94.9%	100.0%	97.5%	88.4%	98.9%
Total	94.1%	61.4%	92.2%	85.4%	100.0%	93.7%	85.5%	93.7%

Table IV.62
Percent of Renter Households with Severe Housing Problems by Income and Race
 State of North Dakota
 2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With A Severe Housing Problem								
\$0 to \$25,350	55.3%	62.5%	44.6%	54.0%	100.0%	69.7%	64.6%	56.1%
\$25,351 to \$42,250	17.7%	24.9%	21.8%	21.3%	0%	6.1%	34.3%	18.9%
\$42,251 to \$67,600	5.7%	11.4%	27.0%	13.5%	0%	4.9%	18.1%	7.0%
\$67,601 to \$84,500	3.3%	38.2%	3.1%	7.6%	0%	0%	5.4%	4.2%
Above \$84,500	4.3%	17.5%	14.3%	12.5%	0%	12.0%	10.0%	5.3%
Total	18.4%	34.3%	25.0%	32.8%	60.0%	20.1%	33.1%	20.5%
Without A Severe Housing Problems								
\$0 to \$25,350	38.4%	28.1%	27.7%	36.6%	0%	29.6%	28.8%	36.8%
\$25,351 to \$42,250	82.3%	75.1%	78.2%	78.7%	0%	93.9%	65.7%	81.1%
\$42,251 to \$67,600	94.3%	88.6%	73.0%	86.5%	0%	95.1%	81.9%	93.0%
\$67,601 to \$84,500	96.7%	61.8%	96.9%	92.4%	100.0%	100.0%	94.6%	95.8%
Above \$84,500	95.7%	82.5%	85.7%	87.5%	0%	88.0%	90.0%	94.7%
Total	80.2%	62.5%	67.8%	63.0%	60.0%	79.7%	64.9%	77.7%

Table IV.63
Percent of Total Households with Severe Housing Problems by Income and Race
 State of North Dakota
 2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With A Severe Housing Problem								
\$0 to \$25,350	50.2%	63.0%	45.7%	50.7%	100.0%	61.1%	64.0%	51.3%
\$25,351 to \$42,250	15.8%	31.7%	27.1%	17.3%	0%	9.8%	31.4%	17.0%
\$42,251 to \$67,600	5.0%	14.5%	21.5%	10.8%	0%	3.5%	14.1%	5.7%
\$67,601 to \$84,500	3.0%	38.2%	2.4%	4.0%	0%	0.8%	3.8%	3.3%
Above \$84,500	1.6%	11.6%	7.0%	7.0%	0%	5.3%	11.0%	1.9%
Total	9.8%	34.7%	19.7%	23.9%	37.5%	14.4%	25.5%	11.2%
Without A Severe Housing Problems								
\$0 to \$25,350	43.2%	27.8%	29.9%	39.8%	0%	37.8%	30.1%	41.5%
\$25,351 to \$42,250	84.2%	68.3%	72.9%	82.7%	0%	90.2%	68.6%	83.0%
\$42,251 to \$67,600	95.0%	85.5%	78.5%	89.2%	0%	96.5%	85.9%	94.3%
\$67,601 to \$84,500	97.0%	61.8%	97.6%	96.0%	100.0%	99.2%	96.2%	96.7%
Above \$84,500	98.4%	88.4%	93.0%	93.0%	100.0%	94.7%	89.0%	98.1%
Total	89.5%	62.4%	75.3%	72.9%	62.5%	85.4%	73.3%	87.8%

Table IV.64
Total Households with Severe Housing Problems by Income and Race
 State of North Dakota
 2012–2016 HUD CHAS Data

Income	Non-Hispanic by Race						Hispanic (Any Race)	Total
	White	Black	Asian	American Indian	Pacific Islander	Other Race		
With A Severe Housing Problem								
\$0 to \$25,350	16,330	1,020	290	1,895	15	445	850	20,845
\$25,351 to \$42,250	4,990	415	130	330	0	65	360	6,290
\$42,251 to \$67,600	2,560	185	85	220	0	35	245	3,330
\$67,601 to \$84,500	955	105	4	40	0	4	25	1,133
Above \$84,500	1,980	85	100	170	0	75	185	2,595
Total	26,815	1,810	609	2,655	15	624	1,665	34,193
Total								
\$0 to \$25,350	32,540	1,620	635	3,740	15	728	1,329	40,607
\$25,351 to \$42,250	31,590	1,310	480	1,910	0	660	1,145	37,095
\$42,251 to \$67,600	51,540	1,275	395	2,045	0	1,010	1,735	58,000
\$67,601 to \$84,500	31,660	275	169	990	10	519	650	34,273
Above \$84,500	127,480	735	1,420	2,420	15	1,425	1,675	135,170
Total	274,810	5,215	3,099	11,105	40	4,342	6,534	305,145

As seen in Table IV.65, the most common housing problem tends to be housing cost burdens. More than 32,855 households have a cost burden and 25,950 have a severe cost burden. Some 18,065 renter households are impacted by cost burdens, and 17,365 are impacted by severe cost burdens. On the other hand, some 14,790 owner-occupied households have cost burdens, and 8,585 have severe cost burdens.

There are a total of 14,790 owner-occupied and 18,065 renter-occupied households with a cost burden of greater than 30 percent and less than 50 percent. An additional 8,585 owner-occupied 17,365 renter-occupied households had a cost burden greater than 50 percent of income. Overall there are 235,190 households without a housing problem.

Table IV.65						
Percent of Housing Problems by Income and Tenure						
State of North Dakota 2012–2016 HUD CHAS Data						
Housing Problem	\$0 to \$25,350	\$25,351 to \$42,250	\$42,251 to \$67,600	\$67,601 to \$84,500	Above \$84,500	Total
Owner-Occupied						
Lacking complete plumbing or kitchen facilities	20.8%	43.8%	38.6%	55.0%	50.4%	37.1%
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	9.3%	8.9%	11.6%	43.4%	18.9%	17.6%
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	17.1%	38.3%	28.8%	45.3%	59.1%	38.6%
Housing cost burden greater than 50% of income (and none of the above problems)	27.4%	40.5%	58.0%	77.9%	72.9%	33.1%
Housing cost burden greater than 30% of income (and none of the above problems)	36.3%	30.0%	55.9%	73.8%	86.3%	45.0%
Zero/negative income (and none of the above problems)	32.7%	0%	0%	0%	0%	32.7%
Has none of the 4 housing problems	43.9%	56.7%	54.4%	64.8%	82.1%	70.9%
Total	32.7%	45.3%	54.1%	65.1%	81.5%	63.5%
Renter-Occupied						
Lacking complete plumbing or kitchen facilities	79.2%	56.2%	61.4%	45.0%	49.6%	62.9%
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	90.7%	91.1%	88.4%	56.6%	81.1%	82.4%
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	82.9%	61.7%	71.2%	54.7%	40.9%	61.4%
Housing cost burden greater than 50% of income (and none of the above problems)	72.6%	59.5%	42.0%	22.1%	27.1%	66.9%
Housing cost burden greater than 30% of income (and none of the above problems)	63.7%	70.0%	44.1%	26.2%	13.7%	55.0%
Zero/negative income (and none of the above problems)	67.3%	0%	0%	0%	0%	67.3%
Has none of the 4 housing problems	56.1%	43.3%	45.6%	35.2%	17.9%	29.1%
Total	67.3%	54.7%	45.9%	34.9%	18.5%	36.5%

Table IV.66
Housing Problems by Income and Tenure

State of North Dakota
 2012–2016 HUD CHAS Data

Housing Problem	\$0 to \$25,350	\$25,351 to \$42,250	\$42,251 to \$67,600	\$67,601 to \$84,500	Above \$84,500	Total
Owner-Occupied						
Lacking complete plumbing or kitchen facilities	185	210	135	55	340	925
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	35	25	40	115	115	330
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	135	310	225	195	635	1,500
Housing cost burden greater that 50% of income (and none of the above problems)	5,155	1,915	1,075	265	175	8,585
Housing cost burden greater than 30% of income (and none of the above problems)	2,885	3,535	4,935	1,705	1,730	14,790
Zero/negative income (and none of the above problems)	955	0	0	0	0	955
Has none of the 4 housing problems	3,915	10,800	24,940	19,990	107,185	166,830
Total	13,265	16,795	31,350	22,325	110,180	193,915
Renter-Occupied						
Lacking complete plumbing or kitchen facilities	705	270	215	45	335	1,570
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	340	255	305	150	495	1,545
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	655	500	555	235	440	2,385
Housing cost burden greater that 50% of income (and none of the above problems)	13,630	2,815	780	75	65	17,365
Housing cost burden greater than 30% of income (and none of the above problems)	5,055	8,230	3,900	605	275	18,065
Zero/negative income (and none of the above problems)	1,965	0	0	0	0	1,965
Has none of the 4 housing problems	4,995	8,240	20,895	10,835	23,395	68,360
Total	27,345	20,310	26,650	11,945	25,005	111,255
Total						
Lacking complete plumbing or kitchen facilities	890	480	350	100	675	2,495
Severely Overcrowded with > 1.51 people per room (and complete kitchen and plumbing)	375	280	345	265	610	1,875
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	790	810	780	430	1,075	3,885
Housing cost burden greater that 50% of income (and none of the above problems)	18,785	4,730	1,855	340	240	25,950
Housing cost burden greater than 30% of income (and none of the above problems)	7,940	11,765	8,835	2,310	2,005	32,855
Zero/negative income (and none of the above problems)	2,920	0	0	0	0	2,920
Has none of the 4 housing problems	8,910	19,040	45,835	30,825	130,580	235,190
Total	40,610	37,105	58,000	34,270	135,185	305,170

Cost Burdens

For owner occupied housing, elderly non-family households are most likely to be impacted by housing cost burdens, with 24.6 percent of these households having a cost burden or severe cost burden. For lower income owner households, elderly non-family households and large families are most likely to experience cost burdens. Some 61.4 percent of elderly non-family and 60.0 percent of large family households below 30 percent HAMFI face cost burdens or severe cost burdens. These data are shown in Table IV.67.

Table IV.67 Owner-Occupied Households by Income and Family Status and Cost Burden State of North Dakota 2012–2016 HUD CHAS Data						
Income	Elderly Family	Small Family	Large Family	Elderly Non-Family	Other Household	Total
No Cost Burden						
\$0 to \$25,350	625	590	160	2,085	615	4,075
\$25,351 to \$42,250	3,370	1,930	560	3,765	1,585	11,210
\$42,251 to \$67,600	6,235	7,735	1,850	4,865	4,610	25,295
\$67,601 to \$84,500	4,675	8,645	1,910	1,825	3,295	20,350
Above \$84,500	19,825	60,375	9,950	4,750	13,355	108,255
Total	34,730	79,275	14,430	17,290	23,460	169,185
Cost Burden						
\$0 to \$25,350	475	425	105	1,550	415	2,970
\$25,351 to \$42,250	630	1,010	355	870	770	3,635
\$42,251 to \$67,600	640	2,110	355	475	1,400	4,980
\$67,601 to \$84,500	260	820	155	75	400	1,710
Above \$84,500	260	950	110	55	365	1,740
Total	2,265	5,315	1,080	3,025	3,350	15,035
Severe Cost Burden						
\$0 to \$25,350	515	885	195	2,185	1,440	5,220
\$25,351 to \$42,250	300	640	175	385	450	1,950
\$42,251 to \$67,600	120	470	25	115	340	1,070
\$67,601 to \$84,500	30	70	4	10	145	259
Above \$84,500	15	90	4	0	65	174
Total	980	2,155	403	2,695	2,440	8,673
Total						
\$0 to \$25,350	1,735	2,140	500	6,080	2,815	13,270
\$25,351 to \$42,250	4,300	3,580	1,090	5,020	2,805	16,795
\$42,251 to \$67,600	6,995	10,315	2,230	5,455	6,350	31,345
\$67,601 to \$84,500	4,965	9,535	2,069	1,910	3,840	22,319
Above \$84,500	20,100	61,415	10,064	4,805	13,785	110,169
Total	38,095	86,985	15,953	23,270	29,595	193,898

Renter households are impacted at a higher rate by cost burdens than owner households. Some 18,879 renter occupied households faced cost burdens, compared to 15,035 owner occupied households. Of these, there are 5,235 renter households with incomes less than 30 percent HAMFI facing a cost burden, and an additional 14,555 renters with incomes below 30 percent HAMFI facing a severe cost burden.

Table IV.68						
Renter-Occupied Households by Income and Family Status and Cost Burden						
State of North Dakota 2012–2016 HUD CHAS Data						
Income	Elderly Family	Small Family	Large Family	Elderly Non-Family	Other Household	Total
No Cost Burden						
\$0 to \$25,350	205	965	340	2,310	1,655	5,475
\$25,351 to \$42,250	445	2,240	635	1,595	3,805	8,720
\$42,251 to \$67,600	735	6,875	920	1,970	11,300	21,800
\$67,601 to \$84,500	350	3,475	560	905	5,915	11,205
Above \$84,500	1,190	9,640	1,155	1,410	11,260	24,655
Total	2,925	23,195	3,610	8,190	33,935	71,855
Cost Burden						
\$0 to \$25,350	145	1,070	135	1,215	2,670	5,235
\$25,351 to \$42,250	230	2,520	325	1,500	4,105	8,680
\$42,251 to \$67,600	305	1,325	265	615	1,530	4,040
\$67,601 to \$84,500	0	230	60	130	235	655
Above \$84,500	15	110	4	60	80	269
Total	695	5,255	789	3,520	8,620	18,879
Severe Cost Burden						
\$0 to \$25,350	250	3,510	360	2,670	7,765	14,555
\$25,351 to \$42,250	35	865	110	945	950	2,905
\$42,251 to \$67,600	50	80	4	410	260	804
\$67,601 to \$84,500	35	15	0	35	0	85
Above \$84,500	20	0	0	55	0	75
Total	390	4,470	474	4,115	8,975	18,424
Total						
\$0 to \$25,350	635	6,060	910	6,525	13,230	27,360
\$25,351 to \$42,250	710	5,625	1,070	4,040	8,860	20,305
\$42,251 to \$67,600	1,090	8,280	1,189	2,995	13,090	26,644
\$67,601 to \$84,500	385	3,720	620	1,070	6,150	11,945
Above \$84,500	1,225	9,750	1,159	1,525	11,340	24,999
Total	4,045	33,435	4,948	16,155	52,670	111,253

In total, some 33,915 households face cost burdens, and 27,115 face severe cost burdens, as seen in Table IV.69.

Table IV.69					
Households with Cost Burden by Tenure and Race					
State of North Dakota					
2012–2016 HUD CHAS Data					
Race	No Cost Burden	Cost Burden	Severe Cost Burden	Not Computed	Total
Owner-Occupied					
White	159,935	14,205	8,040	880	183,060
Black	430	40	30	0	500
Asian	875	25	55	0	955
American Indian	4,230	305	285	110	4,930
Pacific Islander	15	0	0	0	15
Other Race	1,525	185	70	4	1,784
Hispanic	2,185	265	205	4	2,659
Total	169,195	15,025	8,685	998	193,903
Renter-Occupied					
White	60,815	15,150	14,445	1,345	91,755
Black	2,560	880	1,115	150	4,705
Asian	1,340	355	280	165	2,140
American Indian	3,480	1,075	1,315	320	6,190
Pacific Islander	10	0	15	0	25
Other Race	1,615	535	415	4	2,569
Hispanic	2,035	895	845	100	3,875
Total	71,855	18,890	18,430	2,084	111,259
Total					
White	220,750	29,355	22,485	2,225	274,815
Black	2,990	920	1,145	150	5,205
Asian	2,215	380	335	165	3,095
American Indian	7,710	1,380	1,600	430	11,120
Pacific Islander	25	0	15	0	40
Other Race	3,140	720	485	8	4,353
Hispanic	4,220	1,160	1,050	104	6,534
Total	241,050	33,915	27,115	3,082	305,162

ACCESS TO MORTGAGE FINANCE SERVICES

Congress enacted the Home Mortgage Disclosure Act in 1975, permanently authorizing the law in 1988¹³. The Act requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans. Under the HMDA, financial institutions are required to report the race, ethnicity, sex, loan amount, and income of mortgage applicants and borrowers by Census tract. Institutions must meet a set of reporting criteria. For depository institutions, these are as follows:

1. The institution must be a bank, credit union, or savings association;
2. The total assets must exceed the coverage threshold;¹⁴
3. The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA);
4. The institution must have originated or refinanced at least one home purchase loan secured by a first lien on a one- to four-family dwelling;
5. The institution must be federally insured or regulated; and
6. The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac.

For other institutions, including non-depository institutions, the reporting criteria are:

1. The institution must be a for-profit organization;
2. The institution's home purchase loan originations must equal or exceed 10 percent of the institution's total loan originations, or more than \$25 million;
3. The institution must have had a home or branch office in an MSA or have received applications for, originated, or purchased five or more home purchase loans, home improvement loans, or refinancing on property located in an MSA in the preceding calendar year; and
4. The institution must have assets exceeding \$10 million or have originated 100 or more home purchases in the preceding calendar year.

In addition to reporting race and ethnicity data for loan applicants, the HMDA reporting requirements were modified in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

1. If they are HOEPA loans;
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
3. Presence of high-annual percentage rate loans (HALs), defined as more than three percentage points for purchases when contrasted with comparable treasury instruments or five percentage points for refinance loans.

For the purposes of this analysis, these flagged originations will be termed predatory, or at least predatory in nature. Overall, the data contained within the HMDA reporting guidelines represent

¹³ Prior to that year, Congress had to periodically reauthorize the law.

¹⁴ Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

the best and most complete set of information on home loan applications. This report includes HMDA data from 2008 through 2018, the most recent year for which these data are available.

Table IV.70 shows the purpose of loan by year for the State of North Dakota from 2008 to 2018. As seen therein, there were over 327,007 loans during this time period, of these some 148,104 were for home purchases. In 2018, there were 23,505 loans, of which 13,094 were for home purchases.

Table IV.70												
Purpose of Loan by Year												
State of North Dakota 2008–2018 HMDA Data												
Purpose	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Home Purchase	11,573	11,252	11,066	11,779	14,243	15,581	15,653	15,571	14,616	13,676	13,094	148,104
Home Improvement	2,953	2,514	2,218	2,269	2,424	2,775	2,388	2,416	2,630	2,427	1,454	26,468
Refinancing	12,964	20,913	18,119	14,752	19,207	15,482	7,917	11,835	14,045	8,244	7,208	150,686
Total	27,490	34,679	31,403	28,800	35,874	33,838	25,958	29,822	31,291	24,347	23,505	327,007

Table IV.71 shows the occupancy status for loan applicants. A vast majority of applicants were or owner-occupied units, accounting for 93.9 percent between 2008 and 2018, and for 94.0 percent in 2018 alone.

Table IV.71												
Occupancy Status for Applications												
State of North Dakota 2008–2018 HMDA Data												
Status	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Owner-Occupied	26,008	33,515	30,021	27,027	33,677	31,303	23,820	27,681	29,232	22,664	22,091	307,039
Not Owner-Occupied	1,469	1,145	1,364	1,734	2,140	2,521	2,111	2,122	2,034	1,672	303	18,615
Not Applicable	13	19	18	39	57	14	27	19	25	11	1,111	1,353
Total	27,490	34,679	31,403	28,800	35,874	33,838	25,958	29,822	31,291	24,347	23,505	327,007

Owner-occupied home purchase loan applications by loan types are shown in Table IV.72. Between 2008 and 2018, some 57.1 percent of home loan purchases were conventional loans, 25.9 percent were FHA insured, and 11.8 percent were VA Guaranteed, and 5.2 percent were Rural Housing Service or Farm Service Agency.

Table IV.72												
Owner-Occupied Home Purchase Loan Applications by Loan Type												
State of North Dakota 2008–2018 HMDA Data												
Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Conventional	6,339	4,883	4,720	5,142	6,997	8,574	8,966	8,448	8,337	7,885	7,946	78,237
FHA - Insured	3,213	3,965	4,010	3,696	3,850	3,199	2,720	3,216	2,819	2,461	2,295	35,444
VA - Guaranteed	889	1,286	1,206	1,298	1,447	1,714	1,827	1,812	1,700	1,602	1,413	16,194
Rural Housing Service or Farm Service Agency	300	549	465	708	731	706	781	829	699	723	654	7,145
Total	10,741	10,683	10,401	10,844	13,025	14,193	14,294	14,305	13,555	12,671	12,308	137,020

Denial Rates

After the owner-occupied home purchase loan application is submitted, the applicant receives one of the following status designations:

- “Originated,” which indicates that the loan was made by the lending institution;
- “Approved but not accepted,” which notes loans approved by the lender but not accepted by the applicant;
- “Application denied by financial institution,” which defines a situation wherein the loan application failed;
- “Application withdrawn by applicant,” which means that the applicant closed the application process;
- “File closed for incompleteness” which indicates the loan application process was closed by the institution due to incomplete information; or
- “Loan purchased by the institution,” which means that the previously originated loan was purchased on the secondary market.

As shown in Table IV.73, just over 87,324 home purchase loan applications were originated over the 2008-2018 period, and 8,290 were denied.

Table IV.73
Loan Applications by Action Taken

State of North Dakota
2008–2018 HMDA Data

Action	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Loan Originated	6,865	6,851	6,753	6,659	8,230	8,784	8,925	8,937	8,548	8,270	8,502	87,324
Application Approved but not Accepted	351	231	240	300	345	345	285	245	234	259	94	2,929
Application Denied	641	663	647	728	955	934	782	888	804	707	541	8,290
Application Withdrawn by Applicant	544	665	575	680	709	849	867	836	872	958	1,133	8,688
File Closed for Incompleteness	144	62	43	95	187	89	174	327	265	97	56	1,539
Loan Purchased by the Institution	2,196	2,208	2,143	2,382	2,599	3,190	3,261	3,065	2,832	2,380	1,974	28,230
Preapproval Request Denied	0	3	0	0	0	2	0	6	0	0	4	15
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	1	0	0	4	5
Total	10,741	10,683	10,401	10,844	13,025	14,193	14,294	14,305	13,555	12,671	12,308	137,020

The most common reasons cited in the decision to deny one of these loan applications related to the debt-to-income ratio of the prospective homeowner, as shown in Table IV.74. Credit history and collateral were also commonly given as reasons to deny home purchase loans.

Table IV.74
Loan Applications by Reason for Denial

State of North Dakota
2008–2018 HMDA Data

Denial Reason	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Debt-to-Income Ratio	156	173	151	170	192	205	145	182	139	162	141	1,816
Employment History	26	44	31	46	47	45	19	27	28	22	23	358
Credit History	131	151	145	215	269	194	162	159	128	128	108	1,790
Collateral	94	88	99	95	146	159	104	128	109	87	90	1,199
Insufficient Cash	24	25	24	23	31	26	24	19	33	23	28	280
Unverifiable Information	17	16	18	17	33	23	24	25	27	18	24	242
Credit Application Incomplete	25	19	24	28	57	38	52	77	71	58	64	513
Mortgage Insurance Denied	1	4	1	3	1	0	0	3	1	1	1	16
Other	41	36	50	37	69	49	33	27	36	28	46	452
Missing	126	107	104	94	110	195	219	241	232	180	16	1,624
Total	641	663	647	728	955	934	782	888	804	707	541	8,290

Denial rates were observed to differ by race and ethnicity, as shown in Table IV.75. While white applicants had a denial rate of 8.2 over the period from 2008 through 2018, black applicants had a denial rate of 14.8 percent. American Indian applicants also had a denial rate higher than the

average, at 19.4 percent. As for ethnicity, Hispanic applicants had a higher denial rate than non-Hispanic applicants, at 12.6 percent versus 8.3 percent.

Table IV.75
Denial Rates by Race/Ethnicity of Applicant
State of North Dakota
2004–2017 HMDA Data

Race/Ethnicity	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Average
American Indian	19.5%	16.7%	25.5%	20.8%	25.0%	28.6%	18.6%	23.1%	14.0%	10.0%	16.1%	19.4%
Asian	3.6%	8.8%	8.0%	7.9%	18.4%	9.0%	4.8%	7.5%	8.5%	10.8%	10.7%	9.0%
Black	15.9%	17.0%	3.1%	11.8%	17.5%	7.5%	11.6%	21.7%	20.0%	21.6%	7.5%	14.8%
Pacific Islander	10.0%	11.1%	18.2%	0.0%	6.2%	13.3%	21.7%	4.8%	16.7%	0.0%	0.0%	10.2%
White	8.1%	8.5%	8.5%	9.4%	9.9%	9.1%	7.4%	8.4%	7.9%	7.1%	5.4%	8.2%
Not Available	14.4%	11.7%	13.1%	20.4%	18.0%	17.8%	21.2%	16.6%	19.0%	18.8%	10.9%	16.2%
Not Applicable	0.0%	0.0%	%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Average	8.5%	8.8%	8.7%	9.9%	10.4%	9.6%	8.1%	9.0%	8.6%	7.9%	6.0%	8.7%
Hispanic	15.5%	20.5%	6.3%	15.1%	21.1%	16.7%	7.1%	13.8%	7.1%	10.7%	10.1%	12.6%
Non-Hispanic	8.2%	8.5%	8.6%	9.3%	10.1%	9.1%	7.6%	8.6%	8.1%	7.3%	5.4%	8.3%

Predatory Lending

In addition to modifications implemented in 2004 to correctly document loan applicants' race and ethnicity, the HMDA reporting requirements were changed in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

1. If they are HOEPA loans;
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
3. Presence of high annual percentage rate (APR) loans (HALs), defined as more than three percentage points higher than comparable treasury rates for home purchase loans, or five percentage points higher for refinance loans.

Home loans are designated as "high-annual percentage rate" loans (HALs) where the annual percentage rate on the loan exceeds that of a comparable treasury instruments by at least three percentage points. As shown in Table I.V.76, some 1,298 loans between 2008 and 2018 were HALs, accounting for 1.5 percent. The highest rate of HAL loans was seen in 2008, at 7.5 percent, which fell to 0.2 percent in 2017.

Table IV.76
Originated Owner-Occupied Loans by HAL Status
State of North Dakota
2008–2018 HMDA Data

Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
HAL	513	345	60	83	109	69	39	29	20	17	14	1298
Other	6,352	6,506	6,693	6,576	8,121	8,715	8,886	8,908	8,528	8,253	8,488	86026
Total	6,865	6,851	6,753	6,659	8,230	8,784	8,925	8,937	8,548	8,270	8,502	87,324
Percent HAL	7.5%	5.0%	0.9%	1.2%	1.3%	0.8%	0.4%	0.3%	0.2%	0.2%	0.2%	1.5%

F. PUBLICLY SUPPORTED HOUSING ANALYSIS

There are a variety of types and locations of public housing units within the State of North Dakota. According to HUD's AFFH data, there are 12,811 total publicly supported units in the State of North Dakota. Of these, some 1,807 are public housing units, 2,917 are Project Based Section 8, and 117 are other HUD Multifamily. There are 7,879 Housing Choice Vouchers.

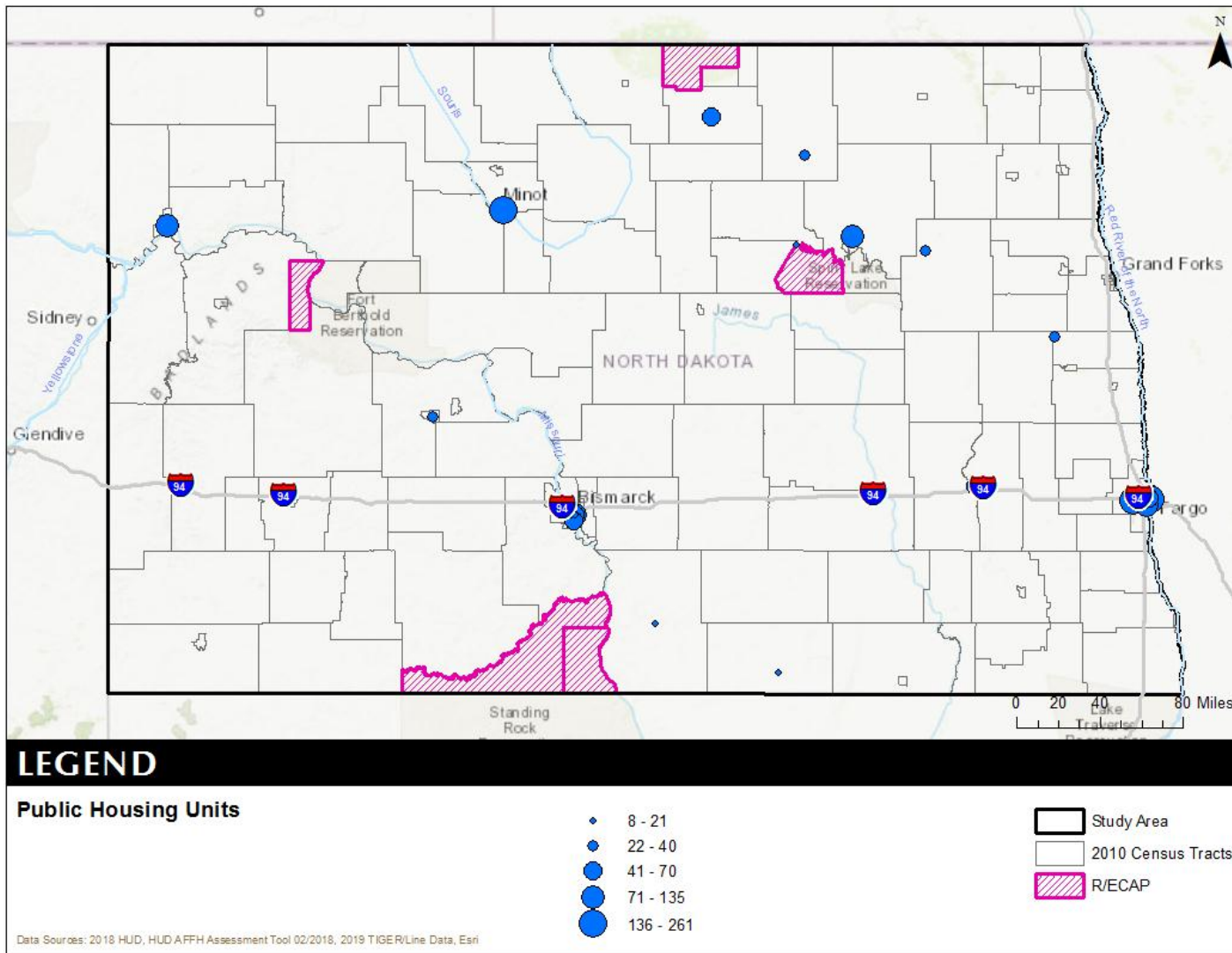
Table IV.77 Residents with Disabilities by Subsidized Housing Type State of North Dakota HUD AFFH Raw Database		
Program	Total Units	Total Disabled Units
Public Housing	1,807	567
Project Based Section 8	2,917	811
Other HUD Multifamily	208	117
Housing Choice Vouchers	7,879	2,267
Total	12,811	3,762

Map IV.12 shows public housing units and Map IV.13 shows housing choice vouchers in the State of North Dakota. Low Income Housing Tax Credit (LIHTC) units are shown in Map IV.14 and Map IV.15 shows other assisted multi-family housing units in the State.

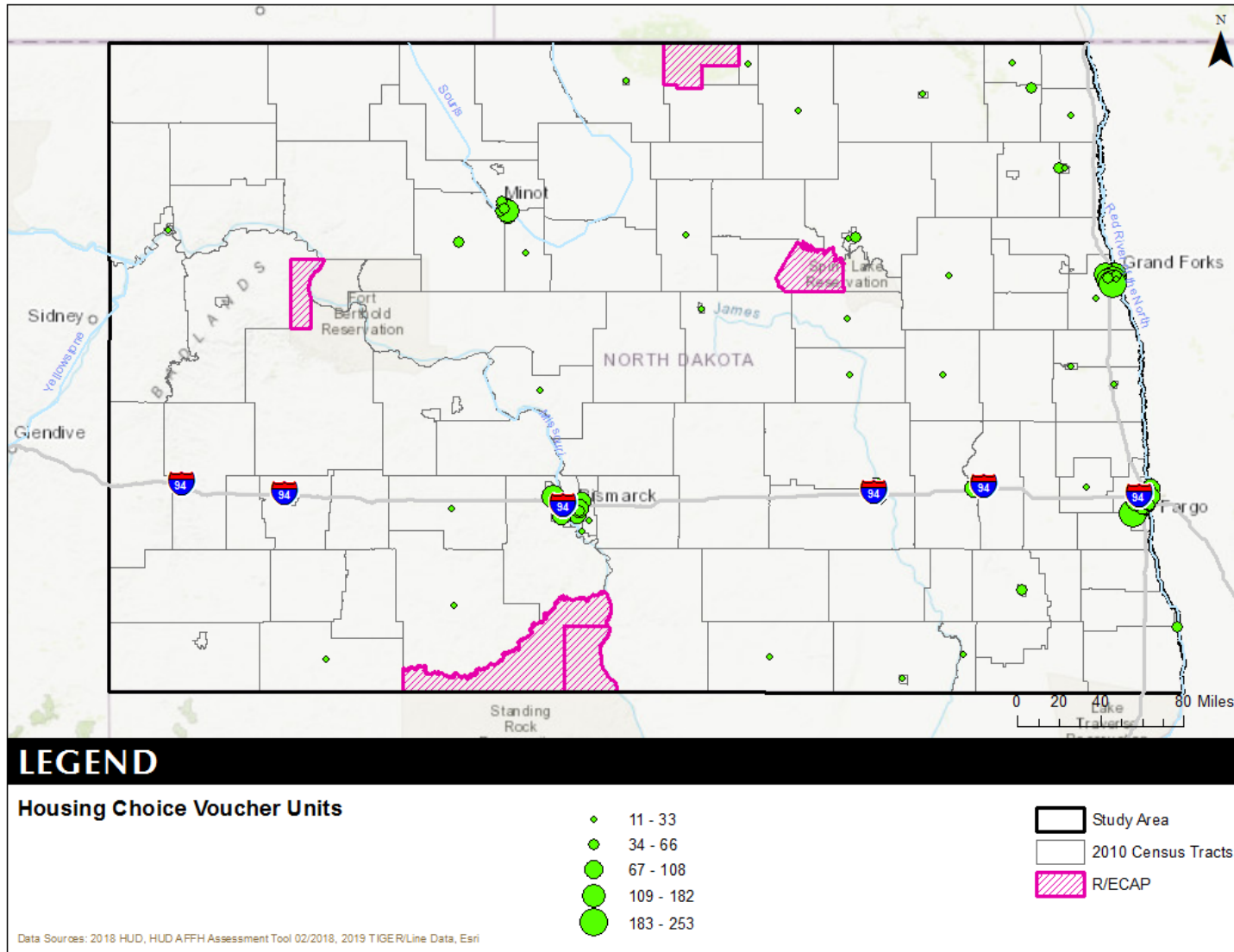
Disparities in Access to Opportunity

The locations of publicly supported housing units are in areas with both high and low access to opportunity. There does not appear to be a concentration of publicly supported housing units in the State.

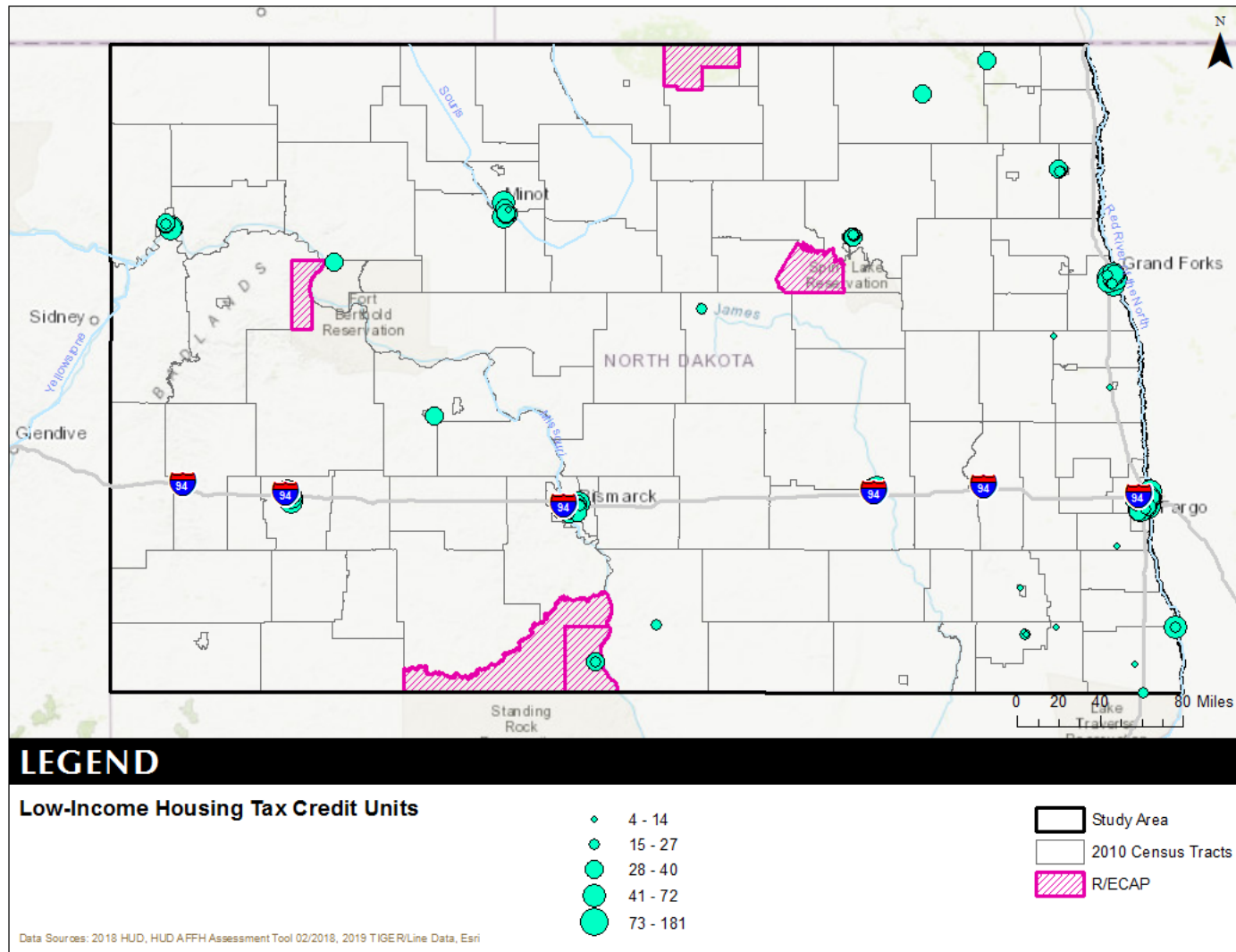
Map IV.12
Public Housing Units
 State of North Dakota
 2018 ACS, 2017 Tigerline, HUD AFFH Tool



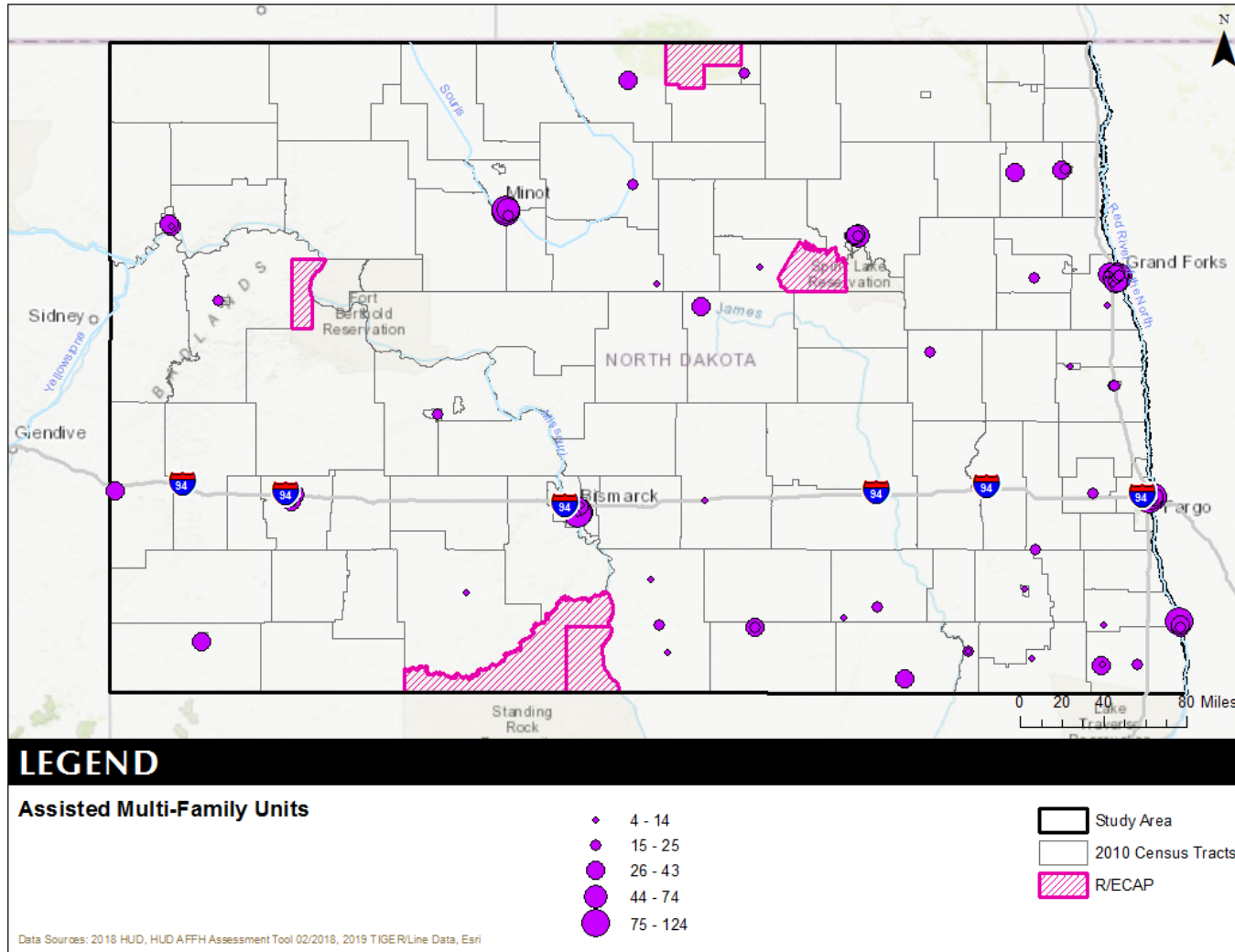
Map IV.13
Housing Choice Voucher Units
State of North Dakota
2018 ACS, 2017 Tigerline, HUD AFFH Tool



Map IV.14
Low Income Housing Tax Credit (LIHTC) Units
 State of North Dakota
 2018 ACS, 2017 Tigerline, HUD AFFH Tool



Map IV.15
Other HUD Multi-Family Units
 State of North Dakota
 2018 ACS, 2017 Tigerline, HUD AFFH Tool



G. DISABILITY AND ACCESS ANALYSIS

Section 503 of the Rehabilitation Act of 1973 prohibits discrimination based on disability in any program or activity receiving federal assistance.¹⁵ Title II of the Americans with Disabilities Act of 1990 prohibits discrimination based on disability by public entities. HUD enforces the housing-related activities of public entities, including public housing, housing assistance, and housing referrals.¹⁶

Persons with Disabilities

Disability by age, as estimated by the 2018 ACS, is shown in Table IV.78, below. The disability rate for females was 10.5 percent, compared to 11.0 percent for males. The disability rate grew precipitously higher with age, with 46.7 percent of those over 75 experiencing a disability.

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	187	0.7%	127	0.5%	314	0.6%
5 to 17	3,847	6.2%	1,689	2.9%	5,536	4.6%
18 to 34	4,989	4.8%	5,376	5.9%	10,365	5.3%
35 to 64	15,931	11.8%	12,484	9.7%	28,415	10.8%
65 to 74	7,279	25.3%	6,059	20.7%	13,338	23.0%
75 or Older	9,142	47.7%	12,234	45.9%	21,376	46.7%
Total	41,375	11.0%	37,969	10.5%	79,344	10.8%

The number of disabilities by type, as estimated by the 2018 ACS, is shown in Table IV.79. Some 5.3 percent have an ambulatory disability, 3.9 have an independent living disability, and 1.7 percent have a self-care disability.

Disability Type	Population with Disability	Percent with Disability
Hearing disability	27,895	3.8%
Vision disability	14,195	1.9%
Cognitive disability	26,893	3.9%
Ambulatory disability	36,281	5.3%
Self-Care disability	11,426	1.7%
Independent living disability	22,017	3.9%

¹⁵ 29 U.S.C. §§794

¹⁶ 42 U.S.C. §§ 12131 – 12165

Housing Accessibility

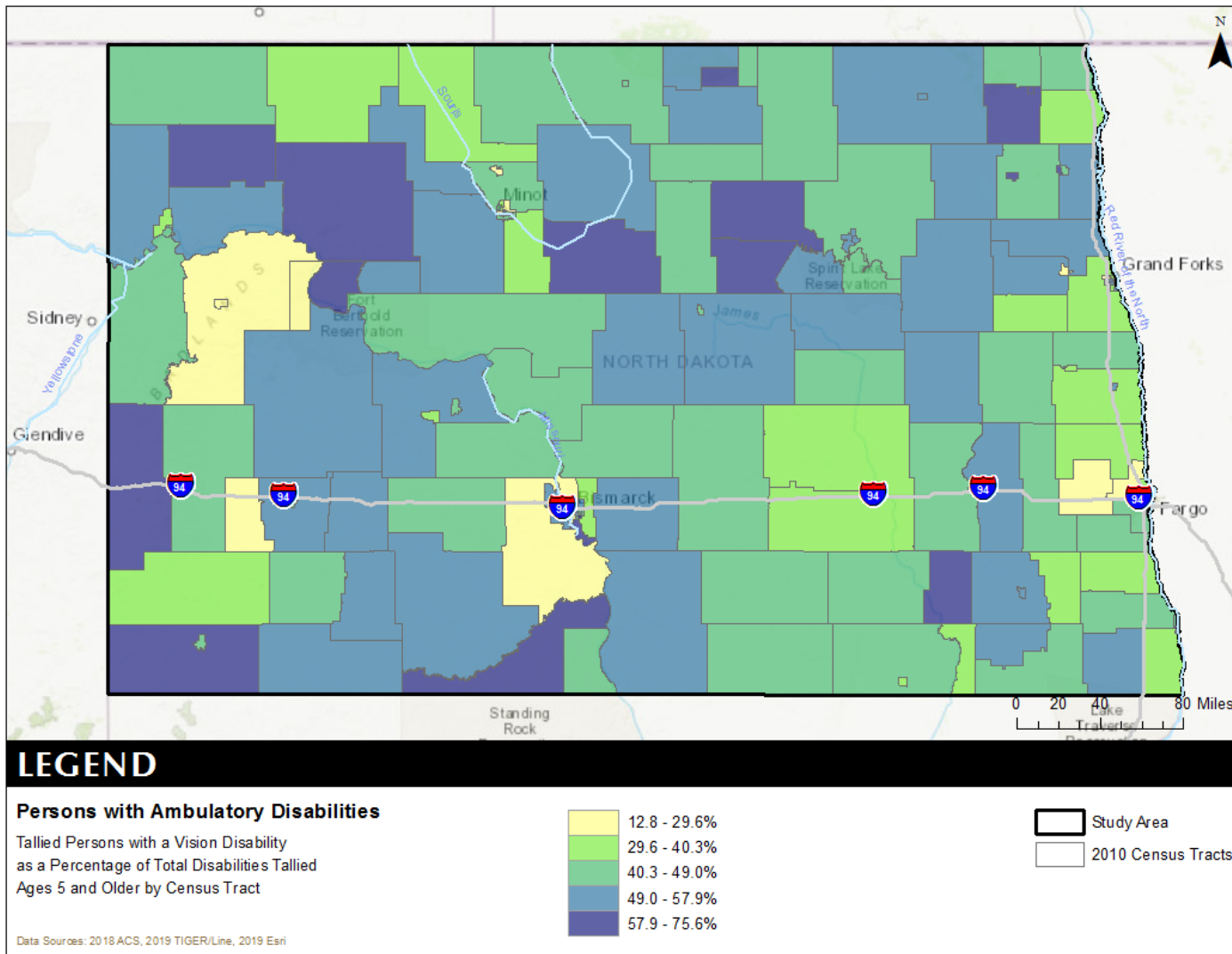
Accessible housing units are located throughout the State. However, many newer housing units are located outside city center areas. These newer housing units are more likely to have the mandatory minimum accessibility features.

Some 29.4 percent of publicly supported housing units, according to HUD's AFFH database, are accessible. This exceeds the rate of disability for the general population in the State. However, with the aging population, and the rate of disabilities for persons utilizing publicly supported housing, this may not meet the needs of current and future residents with disabilities.

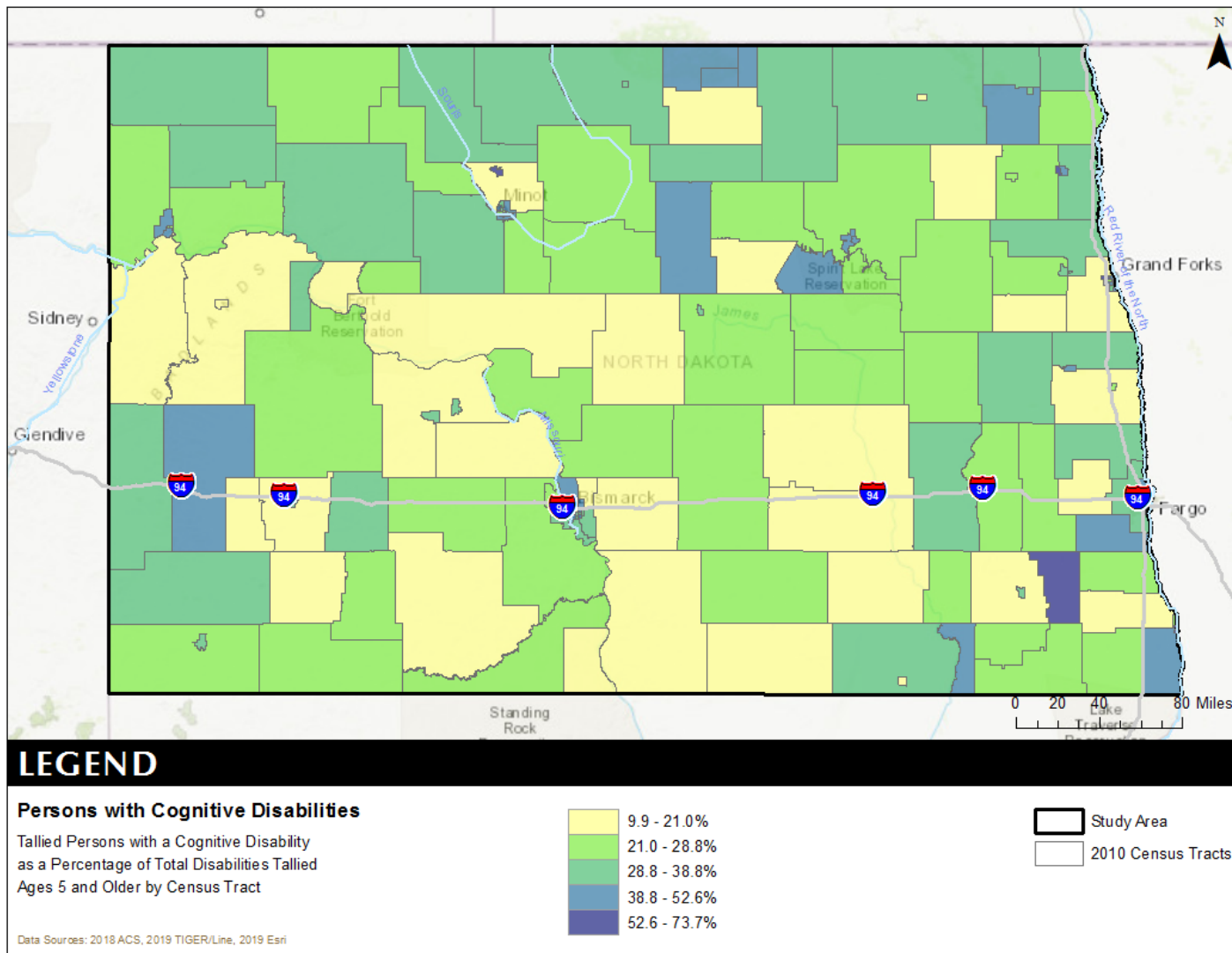
Table IV.80 Residents with Disabilities by Subsidized Housing Type State of North Dakota HUD AFFH Raw Database		
Program	Total Units	Total Disabled Units
Public Housing	1,807	567
Project Based Section 8	2,917	811
Other HUD Multifamily	208	117
Housing Choice Vouchers	7,879	2,267
Total	12,811	3,762

The Maps on the following pages show the distribution of households with various disabilities. There does not appear to be a concentration of households by disability type in any one area of the State.

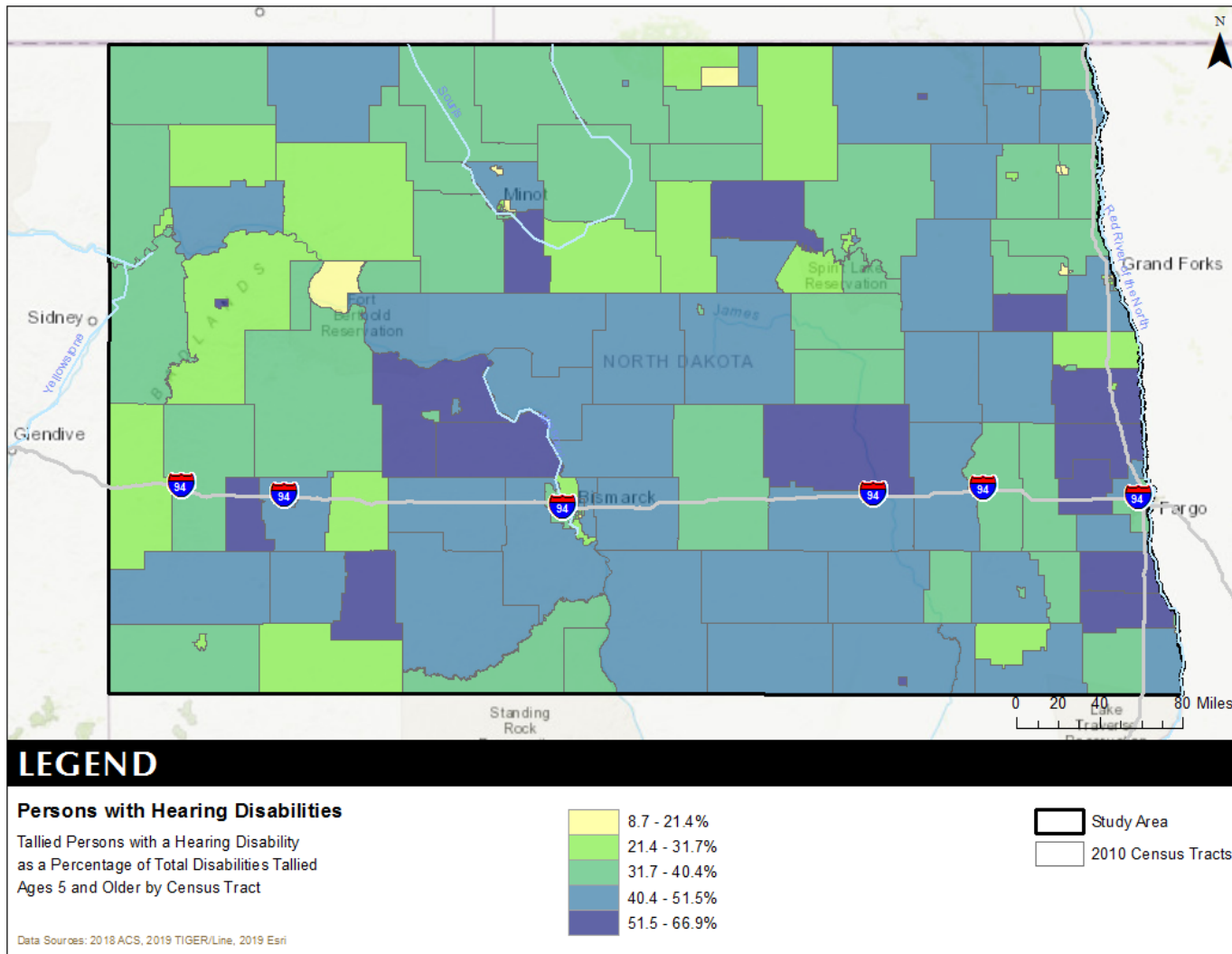
Map IV.16
Persons with Ambulatory Disabilities
 State of North Dakota
 2018 ACS, 2017 Tigerline, HUD AFFH Tool



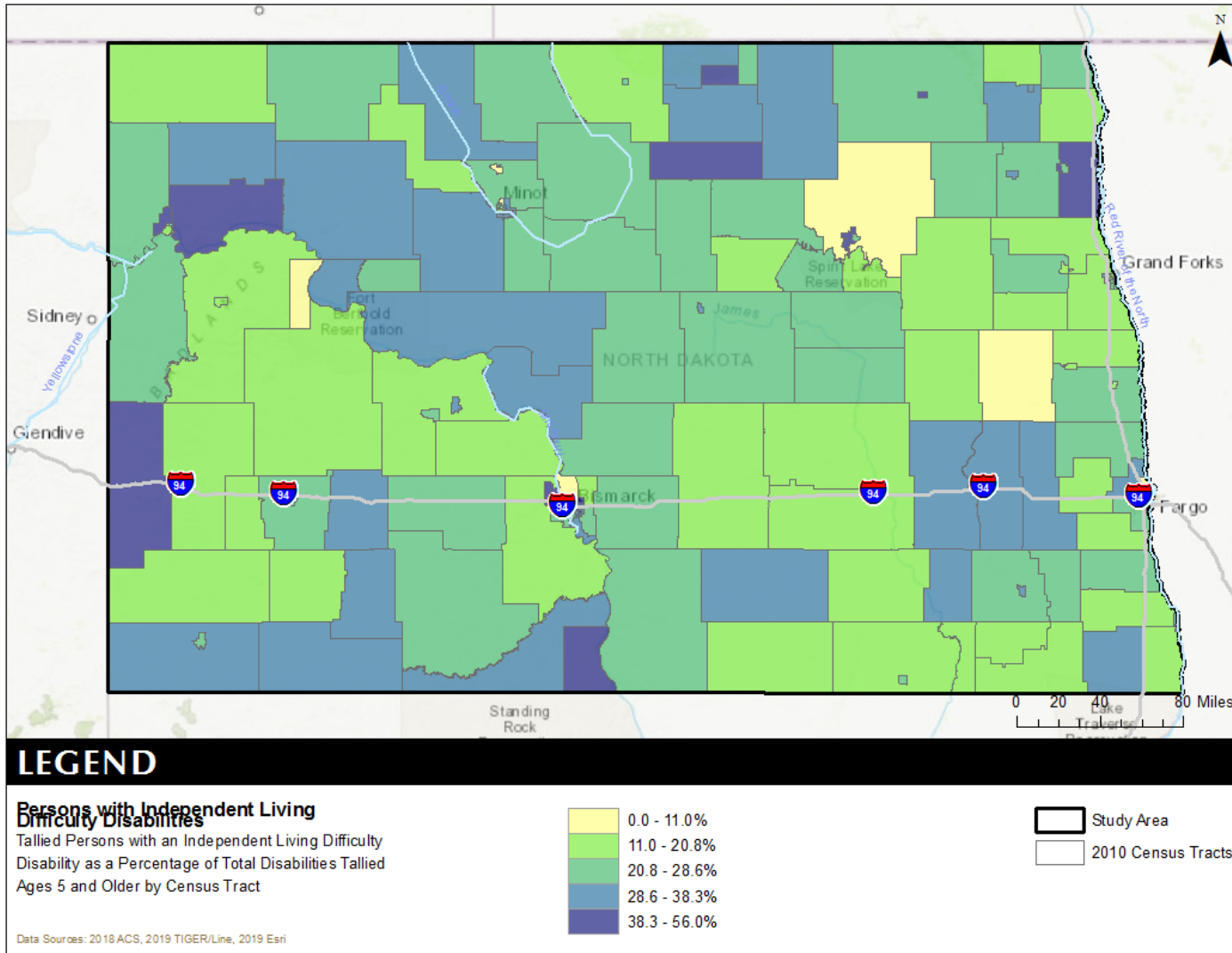
Map IV.17
Persons with Cognitive Disabilities
 State of North Dakota
 2018 ACS, 2017 Tigerline, HUD AFFH Tool



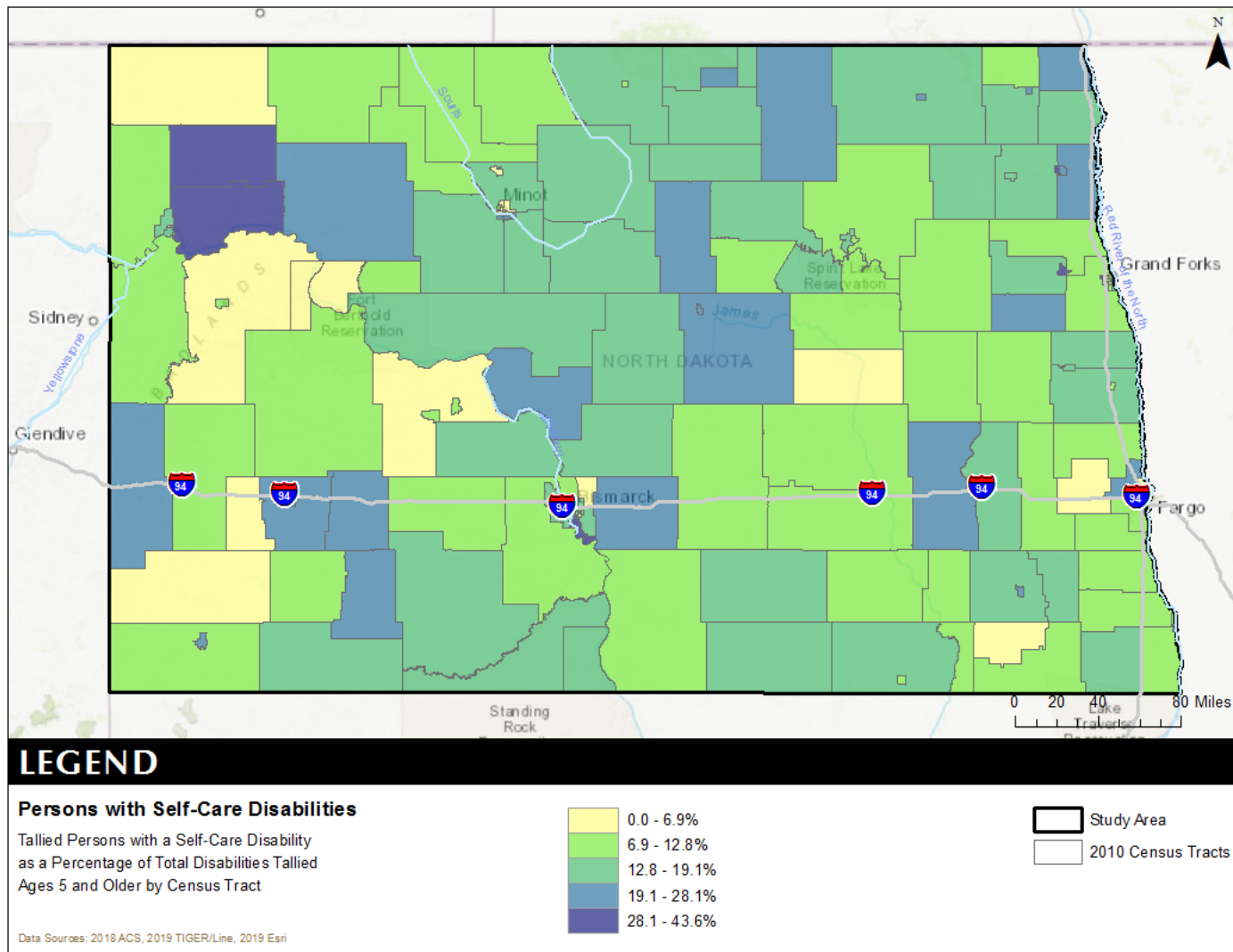
Map IV.18
Persons with Hearing Disabilities
 State of North Dakota
 2018 ACS, 2017 Tigerline, HUD AFFH Tool



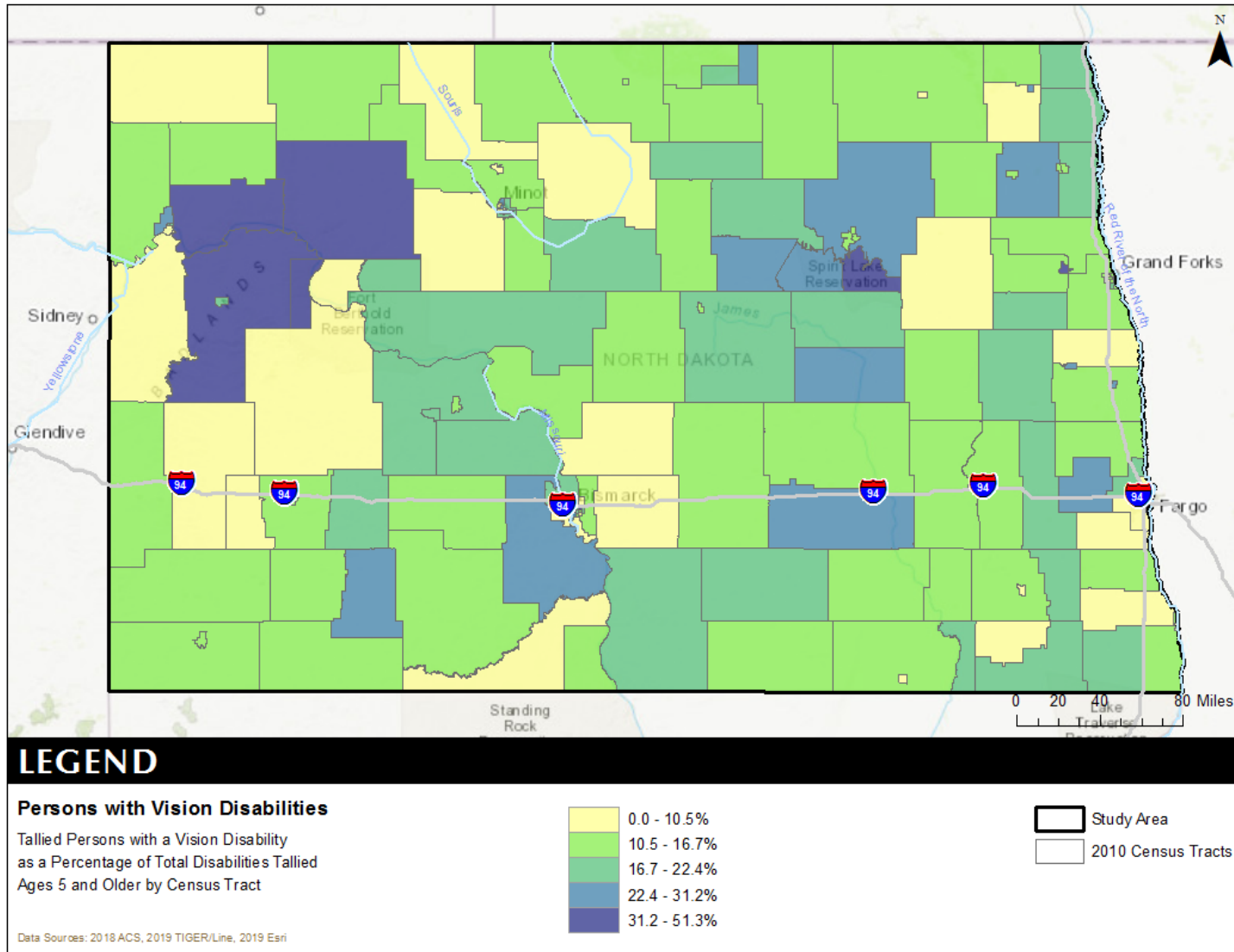
Map IV.19
Persons with Independent Living Disabilities
 State of North Dakota
 2018 ACS, 2017 Tigerline, HUD AFFH Tool



Map IV.20
Persons with Self Care Disabilities
 State of North Dakota
 2018 ACS, 2017 Tigerline, HUD AFFH Tool



Map IV.21
Persons with Vision Disabilities
 State of North Dakota
 2018 ACS, 2017 Tigerline, HUD AFFH Tool



H. FAIR HOUSING ENFORCEMENT, OUTREACH CAPACITY, & RESOURCES

FEDERAL FAIR HOUSING LAWS

Federal laws provide the backbone for U.S. fair housing regulations. The following federal and state rules, regulations, and executive orders inform municipalities and developers of their fair housing obligations and the rights of protected classes. Many of these statutes were successful in generating specialized resources, such as data, to aid organizations, government entities, and individuals in affirmatively furthering fair housing. While some laws have been previously discussed in this report, a list of laws related to fair housing, as defined on the U.S. Department of Housing and Urban Development's (HUD) website, is presented below:

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act)¹⁷

The Fair Housing Act prohibits discrimination in the sale, rental, financing, and insuring of housing on the basis of race, color, religion, sex, and national origin. In 1988, the act was amended to include family status and disability as protected classes, which includes children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18. Jurisdictions may add protected classes but are not allowed to subtract from the seven federally protected classes.¹⁸ The Act also contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.¹⁹ On April 30, 2013, HUD and the Department of Justice released a Joint Statement that provides guidance regarding the persons, entities, and types of housing and related facilities that are subject to the accessible design and construction requirements of the Act.

It is unlawful under the Act to discriminate against a person in a protected class by: Refusing to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny, a dwelling to any person because of race, color, religion, sex, familial status, or national origin; discriminating against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or facilities based on a protected class; representing that a dwelling is not available for inspection, sale, or rental when it is, in fact, available; publishing an advertisement indicating any preference, limitation, or discrimination against a protected class; or refusing to allow a person with a disability to make a reasonable modification to the unit at the renter's own expense.

There are several exceptions to the law. It is legal for developments or buildings for the elderly to exclude families with children. In addition, single-family homes being sold by the owner of an owner-occupied 2 family home may be exempt, unless a real estate agency is involved, if they have advertised in a discriminatory way, or if they have made discriminatory statements. There are no exemptions for race discrimination because race is covered by other civil rights laws.

The following are examples of Fair Housing Act violations:

1. Making any representation, directly or implicitly, that the presence of anyone in a protected class in a neighborhood or apartment complex may or will have the effect of lowering

¹⁷ 42 U.S.C. 3601, et. Seq., as amended in 1988

¹⁸ "HUD Fair Housing Laws and Presidential Executive Orders."

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws

¹⁹ "Title VIII: Fair Housing and Equal Opportunity."

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/progdesc/title8

property taxes, reduce safety, make the neighborhood and/or schools worse, change the character of the neighborhood, or change the ability to sell a home.

2. Providing inconsistent, lesser, or unequal service to customers or clients who are members of a protected class, such as failing to return calls from a buyer agent to avoid presenting a contract to your seller, avoiding or delaying an appointment for a showing a listing, making keys unavailable, failing to keep appointments, or refusing maintenance or repairs to an apartment.
3. Requiring higher standards for a member of a protected class, including asking for more references or demanding a higher credit rating.
4. Requiring employers to make distinctions on applications, or in the application process, among protected class members, including marking applications to indicate race, sex, etc. of applicant or misrepresenting availability for particular protected classes.
5. Advertising in a manner that indicates a preference for a particular class and thereby excluding protected class members.

Title VI of the Civil Rights Act of 1964

Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance, including denying assistance, offering unequal aid, benefits, or services, aiding or perpetuating discrimination by funding agencies that discriminate, denying planning or advisory board participation, using discriminatory selection or screening criteria, or perpetuating the discrimination of another recipient based on race, color, or national origin.

Section 504 of the Rehabilitation Act of 1973

The Act prohibits discrimination based on disability in any program or activity receiving federal financial assistance. The concept of “reasonable accommodations” and “reasonable modifications” was clarified in memos dated May 17, 2004 and March 5, 2008. Reasonable accommodations are changes in rules, policies, practices, or services so that a person with a disability can participate as fully in housing activities as someone without a disability. Reasonable modifications are structural changes made to existing premises, occupied or to be occupied by a person with a disability so they can fully enjoy the premises.

Section 109 of the Housing and Community Development Act of 1974

Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs or activities funded from HUD’s Community Development Block Grant Program.

Title II of the Americans with Disabilities Act of 1990

Title II applies to state and local government entities and protects people with disabilities from discrimination on the basis of disability in services, programs, and activities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

Architectural Barriers Act of 1968

The Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 be accessible to and useable by handicapped persons. The ABA

specifies accessibility standards for ramps, parking, doors, elevators, restrooms, assistive listening systems, fire alarms, signs, and other accessible building elements and are enforced through the Department of Defense, HUD, the General Services Administration, and the U.S. Postal Services.

Age Discrimination Act of 1975

The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance, applies to all ages, and may be enforced by the head of any Federal department or agency by terminating grant funding for those with an express finding on the record who fail to comply with the Act after reasonable notice. HUD established regulations for implementation of the Age Discrimination Act for HUD programs.

Title IX of the Education Amendments Act of 1972

Title IX prohibits discrimination on the basis of sex or blindness in education programs or activities that receive federal financial assistance.²⁰

The Home Mortgage Disclosure Act (HMDA)

HMDA requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans, including the race, ethnicity, sex, loan amount, and income of mortgage applicants and borrowers by Census tract. Depository institutions that meet the following criteria are required to report:

- Bank, credit union, or savings association
- Total assets must exceed the coverage threshold²¹
- The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA)
- The institution must have originated or refinanced at least one home purchase loan secured by a first lien on a one- to four-family dwelling
- The institution must be federally insured or regulated
- The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac

For other institutions, including non-depository institutions, the reporting criteria are:

1. The institution must be a for-profit organization
2. The institution's home purchase loan originations must equal or exceed 10 percent of the institution's total loan originations, or more than \$25 million
3. The institution must have had a home or branch office in an MSA or have received applications for, originated, or purchased five or more home purchase loans, home improvement loans, or refinancing on property located in an MSA in the preceding calendar year
4. The institution must have assets exceeding \$10 million or have originated 100 or more home purchases in the preceding calendar year

In addition to reporting race and ethnicity data for loan applicants, the HMDA reporting requirements were modified in response to the Predatory Lending Consumer Protection Act of 2002

²⁰ HUD Fair Housing Laws and Presidential Executive Orders."

²¹ Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer price Index for Urban Wage Earners and Clerical Workers.

as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

1. If they are HOEPA loans
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans)
3. Presence of high-annual percentage rate loans (HALs), defined as more than three percentage points for purchases when contrasted with comparable treasury instruments or five percentage points for refinance loans

EXECUTIVE ORDERS

Executive Order 11063 Equal Opportunity in Housing

Signed by President Kennedy on November 20, 1962, the Order prohibits discrimination based on race, color, religion, creed, sex, or national origin in the sale, leasing, rental, or other disposition of properties and facilities owned, operated, or funded by the federal government. The Order also prohibits discrimination in lending practices that involve loans insured or guaranteed by federal government.

Executive Order 12892 Leadership and Coordination of Fair Housing in Federal Programs: Affirmatively Furthering Fair Housing

Signed by President Clinton on January 11, 1994, the Order required federal agencies to affirmatively further fair housing in the programs and activities with the Secretary of HUD coordinating the effort, and established the President's Fair Housing Council, which is chaired by the Secretary of HUD.

Executive Order 12898 Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations

Signed by President Clinton on February 11, 1994, the order requires federal agencies to practice environmental justice in its programs, policies, and activities. Specifically, developers and municipalities using federal funds must evaluate whether or not a project is located in a neighborhood with a concentration of minority and low-income residents or a neighborhood with disproportionate adverse environmental effects on minority and low-income populations. If those conditions are met, viable mitigation measures or alternative project sites must be considered.

Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency

Signed by President Clinton on August 11, 2000, the Order eliminates limited English proficiency as a barrier to full and meaningful participation in federal programs by requiring federal agencies to examine the services they provide, identify the need for LEP services, then develop and implement a system to provide those services. The Department of Justice issued policy guidance which set forth compliance standards to ensure accessibility to LEP persons.

Executive Order 13217 Community Based Alternatives for Individuals with Disabilities

Signed by President Bush on June 18, 2001, the Order requires federal agencies to evaluate their policies and programs to determine if they need to be revised to improve the availability of community-based living arrangements for persons with disability, noting that isolating or

segregating people with disabilities in institutions is a form of disability-based discrimination prohibited by Title II of the ADA.

STATE FAIR HOUSING LAWS AND RESOURCES

In addition to the federal Fair Housing Act, residents of North Dakota are protected from discrimination in the housing market by Chapter 14-02.5 of North Dakota Century Code. This law provides for state level enforcement of fair housing policy, and expands upon the federal Act by including protections based on age, marital status, and use of public assistance. The state's Department of Labor and Human Rights (DOLHR) is identified in N.D.C.C. 14-02.5-13 as the agency responsible for enforcing the provisions of the state fair housing law. HUD has judged this law to offer fair housing protections that are substantially equivalent to those offered under the Fair Housing Act, which enables the DOLHR partner with HUD in the investigation and resolution of fair housing complaints under the Fair Housing Assistance Partnership.

STATE AGENCIES

The North Dakota Department of Labor and Human Rights (DOLHR) serves North Dakota residents who believe that they have been subjected to illegal discrimination in the housing market. Considered by HUD to be a substantially equivalent agency, the DOLHR is a participant in the Fair Housing Assistance Program (FHAP) and is charged with the enforcement of the federal Fair Housing Act as well as the state fair housing law. Accordingly, those who believe that they have been subjected to unlawful discrimination on the basis of race, sex, color, national origin, religion, familial status, disability, age, marital status, or use of public assistance may lodge a complaint with the DOLHR through the following information:

Address:

North Dakota Department of Labor and Human Rights
600 East Boulevard Avenue, Department 406
Bismarck, North Dakota 58505-0340

Telephone: (701) 328-2660

Toll Free: 1(800) 582-8032

TTY: 1(800) 366-6888 or 1(800) 366-6889 (Relay ND)

Fax: (701) 328-2031

Web Site: labor@nd.gov or humanrights@nd.gov

PRIVATE ORGANIZATION

The High Plains Fair Housing Center

The High Plains Fair Housing Center, a Grand Forks-based non-profit organization, was founded in 2012. In service of its mission to "strengthen communities and to ensure equal access to fair housing in the region²²", the fair housing center accepts fair housing complaints from state residents who believe that they have been the victims of illegal discrimination in the housing market, and serves as an advocate for those residents during the complaint process. In addition, the organization provides a range of outreach, education, and training activities for renters, landlords, and property

²² "Fair Housing Center Opened." [North Dakota Housing Finance Agency News](http://ndhousing.areavoices.com/2013/03/11/fair-housing-center-opened/). Posted March 11, 2013. Available at <http://ndhousing.areavoices.com/2013/03/11/fair-housing-center-opened/>. Accessed February 23, 2015.

managers. The High Plains Fair Housing Center may be contacted through the following information:

Address:

High Plains Fair Housing Center
P.O. Box 5222
Grand Forks, North Dakota 58206

Telephone: (701) 203-1077

Toll Free: 1(866) 380-2738

Web Site: highplainsfairhousing@gmail.com

University of North Dakota Housing and Employment Law Clinic

The School of Law at the University of North Dakota provides a range of services to residents who are unable to obtain legal representation through the Housing and Employment Law Clinic. Under the supervision of faculty, students at the school serve as legal advocates for clients who believe that they have been subjected to illegal discrimination in the housing market or at their place of work, as well as those who believe that they have not received fair wages for their work. In fair housing cases, such advocacy may span the entire complaint process, from client interviews and the drafting of correspondence to the negotiation of settlements and the conduct of trials before state, federal, and administrative tribunals. The Clinic also supports the High Plains Fair Housing Center in its mission by accepting cases referred to it by the Center. However, it should be noted that the School of Law, which is primarily an educational institution, is only able to accept a small number of fair housing complaints for representation.

FAIR HOUSING COMPLAINTS

Federal Fair Housing Law prohibits housing discrimination based on race, color, national origin, religion, sex, familial status, or disability. An individual may file a complaint if they feel their rights have been violated. HUD maintains records of complaints that represent potential and actual violations of federal housing law.

Fair Housing and Equal Opportunity (FHEO) begins its complaint investigation process shortly after receiving a complaint. A complaint must be filed within one year of the last date of the alleged discrimination under the Fair Housing Act. Other civil rights authorities allow for complaints to be filed after one year for good cause, but FHEO recommends filing as soon as possible. Generally, FHEO will either investigate the complaint or refer the complaint to another agency to investigate. Throughout the investigation, FHEO will make efforts to help the parties reach an agreement. If the complaint cannot be resolved voluntarily by an agreement, FHEO may issue findings from the investigation. If the investigation shows that the law has been violated, HUD or the Department of Justice may take legal action to enforce the law.

As shown in Table IV.81, disability was the perceived basis for discrimination in 249 complaints lodged with HUD from 2008 through 2019. The next most common was race and familial status, which was cited in 37 complaints each. Note that complainants may cite more than one basis in complaints filed with HUD; indeed, 431 bases were cited in the 410 complaints HUD received.

Table IV.81
Fair Housing Complaints by Basis
 State of North Dakota
 HUD Fair Housing Complaints

Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Disability	12	32	21	20	19	30	20	14	17	36	11	17	249
Race	3	4	2	1	4	4	3	7	2	5	0	2	37
Familial Status	7	14	1	2	4	3	1	1	1	2	1	0	37
Public Assistance	2	6	1	0	2	4	3	1	5	2	3	3	32
National Origin	1	2	1	1	2	1	4	2	1	1	2	1	19
Color	0	0	2	3	0	2	3	1	1	1	1	2	16
Retaliation	0	0	0	0	1	3	1	1	4	2	2	1	15
Sex	1	0	0	0	0	1	2	3	2	0	1	1	11
Age	0	1	3	0	1	1	1	1	1	0	0	0	9
Marital Status	0	0	0	0	1	0	3	1	0	1	0	0	6
Total Basis	26	59	31	27	34	49	41	32	34	50	21	27	431
Total Complaints	29	62	31	27	34	49	41	32	34	50	21	27	410

In addition to the basis for discrimination, HUD records the issue, or alleged discriminatory action related to each complaint. These are presented in Table IV.82. In the same way that bases are reported, more than one issue may be associated with each complaint. Terms and conditions was the most common type of discriminatory behavior alleged, cited in 205 complaints. The next most common complaint related to accommodation, accounting for 189 complaints.

Table IV.82
Fair Housing Complaints by Issue
 State of North Dakota
 HUD Fair Housing Complaints

Issue	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Terms & Conditions	15	21	20	11	16	22	20	16	10	16	17	21	205
Accommodation	9	20	16	11	16	24	13	12	14	32	9	13	189
Harassment	0	0	0	1	4	12	11	16	7	12	8	6	77
Refusal to Rent	8	11	5	5	6	5	6	0	7	9	4	3	69
Other	4	17	6	9	4	4	1	1	1	2	0	4	53
Advertising	6	16	2	1	4	3	0	1	3	6	3	2	47
Eviction	0	0	0	1	4	7	10	14	4	1	1	0	42
Modification	0	1	2	1	1	1	0	0	0	2	1	1	10
Nonrenewal	0	0	0	0	2	3	1	0	1	0	1	2	10
Steering	0	0	0	0	1	0	0	0	2	1	1	0	5
Refusal to Sell	0	1	0	0	0	1	1	0	0	0	0	1	4
Constructive Eviction	0	0	0	0	0	0	0	1	1	1	0	0	3
Accessibility	0	0	0	0	0	0	0	0	2	0	0	0	2
Financing	0	1	0	0	0	0	0	0	0	1	0	0	2
Refusal to Show	0	0	0	0	0	1	0	0	0	0	0	0	1
Sexual Harassment	0	0	0	0	0	0	0	1	0	0	0	0	1
Total Issues	45	91	51	40	58	83	63	62	52	83	45	53	726
Total Complaints	29	62	31	27	34	49	41	32	34	50	21	27	410

Some 163 complaints lodged with the HUD were determined to have no cause, meaning that the HUD investigation did not produce sufficient evidence that discrimination had occurred or was about to occur to file a lawsuit against the accused party. Some 200 complaints were conciliated or settled, as shown in Table IV.83.

Table IV.83
Fair Housing Complaints by Closure
 State of North Dakota
 HUD Fair Housing Complaints

Closure	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Conciliated Settlement	13	30	17	9	17	14	22	7	13	34	9	15	200
No Reasonable Cause	11	18	11	10	13	26	12	18	18	12	9	5	163
Withdrawn With Resolution	2	1	0	5	2	7	3	4	0	1	1	1	27
Charge Issued	2	6	0	1	1	0	1	2	0	0	0	1	14
Failure to Cooperate	0	3	2	1	0	2	2	0	0	0	1	0	11
Withdrawn Without Resolution	1	4	0	0	1	0	1	1	1	1	0	0	10
Reactivated	0	0	0	0	0	0	0	0	1	2	1	5	9
Lack of Jurisdiction	0	0	1	0	0	0	0	0	1	0	0	0	2
Settled after Charge Issued	0	0	0	1	0	0	0	0	0	0	0	0	1
Total Closures	29	62	31	27	34	49	41	32	34	50	21	27	437
Total Complaints	29	62	31	27	34	49	41	32	34	50	21	27	410

Complaints with Cause

Table IV.84, below, presents the bases cited for the complaints considered to have cause: for the purposes of this study, such complaint includes those that were withdrawn after resolution, conciliated, or settled. Disability was the most common basis in those considered to have cause, cited in 147 complaints, followed by familial status, cited in 21 complaints.

Table IV.84
Fair Housing Complaints with Cause by Basis
 State of North Dakota
 HUD Fair Housing Complaints

Basis	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Disability	9	18	12	10	13	13	15	5	9	27	5	11	147
Familial Status	5	12	1	0	1	0	1	0	0	1	0	0	21
Public Assistance	1	3	1	0	2	0	0	0	2	2	3	2	16
Race	0	1	1	0	1	1	1	2	1	1	0	1	10
National Origin	0	1	0	0	0	0	2	1	0	1	1	1	7
Color	0	0	1	1	0	0	1	0	0	0	0	1	4
Sex	0	0	0	0	0	0	1	1	1	0	0	0	3
Age	0	0	1	0	1	0	1	0	0	0	0	0	3
Marital Status	0	0	0	0	0	0	1	0	0	1	0	0	2
Retaliation	0	0	0	0	0	0	0	0	0	1	0	0	1
Total Basis	15	35	17	11	18	14	23	9	13	34	9	16	214
Total Complaints	15	36	17	11	18	14	23	9	13	34	9	16	199

Accommodation was the most common discriminatory action cited in complaints that were considered to have cause, as shown in Table IV.85. This issue was cited in 109 of the 199 complaints considered to have cause. Terms and conditions was the second most frequent, alleged in 85 complaints.

Table IV.85
Fair Housing Complaints with Cause by Issue
 State of North Dakota
 HUD Fair Housing Complaints

Issue	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
Accommodation	7	9	8	6	11	8	9	5	6	25	6	9	109
Terms & Conditions	7	14	10	0	6	5	9	4	3	8	7	12	85
Refusal to Rent	6	8	2	4	4	1	4	0	3	6	3	3	44
Advertising	5	15	0	0	1	1	0	0	1	3	3	0	29
Harassment	0	0	0	0	2	3	6	4	1	6	0	3	25
Other	3	9	3	3	1	0	1	0	1	2	0	2	25
Eviction	0	0	0	1	0	1	6	2	0	0	0	0	10
Nonrenewal	0	0	0	0	1	0	0	0	0	0	1	1	3
Modification	0	0	0	1	0	0	0	0	0	0	0	1	2
Accessibility	0	0	0	0	0	0	0	0	2	0	0	0	2
Refusal to Sell	0	0	0	0	0	1	1	0	0	0	0	0	2
Steering	0	0	0	0	0	0	0	0	0	1	1	0	2
Constructive Eviction	0	0	0	0	0	0	0	0	1	0	0	0	1
Refusal to Show	0	0	0	0	0	1	0	0	0	0	0	0	1
Total Issues	28	56	23	15	26	21	36	15	18	51	21	31	341
Total Complaints	15	36	17	11	18	14	23	9	13	34	9	16	199

FAIR HOUSING TESTING

The High Plains Fair Housing Center of North Dakota (HPFHC) conducts fair housing testing on an annual basis in conjunction with the State's fair housing efforts. The following tables summarize the outcome of these intake and testing results from 2015 through 2019. As seen in Table IV.86, there were a total of 1,307 intakes between 2015 and 2019. The majority of these were for landlord or tenants.

Type	2015	2016	2017	2018	2019	Total
Landlord/Tenant	12	88	119	131	155	505
FH-Rental	18	66	100	135	167	486
General Inquiry	10	90	85	62	21	268
Tester Inquiry		1	12	5		18
FH-Mortgage					8	8
Other		4		3	1	8
FH-Condo			3		3	6
FH-Education					5	5
FH-Sale		2				2
Home Modification Inquiry		1				1
Total	40	252	319	336	360	1,307

The most common basis for fair housing testing in 2018 and 2019 were for disability status, accounting for 222. This was followed by race/color, accounting for 47.

Intake by Basis	2018	2019	Total
None	180	180	360
Disability status	99	123	222
Race/color	28	19	47
Public Assistance	8	17	25
Gender	7	16	23
National origin/ethnicity	10	12	22
Familial status	14	6	20
Other	11	3	14
Religion/creed	3	2	5
Age	2	1	3
Marital status		1	1
Sexual orientation		1	1
Total	336	360	696

There were 123 fair housing tests on the basis of disability between 2016 and 2019. This was followed by 67 on the basis of race.

Table IV.88					
Tests by Protected Class					
State of North Dakota					
Type	2016	2017	2018	2019	Total
Disability	24	34	36	29	123
Race		9	27	31	67
National Origin	1	1	24	39	65
Race/National Origin	9	37			46
Familial Status		3	12	18	33
Sex			6		6
None (Control)	3				3
None (RA Pair)	1				1
Total	38	84	105	117	344

Table IV.89 shows tests by protected class when test results supported the allegations. There were 34 tests on the basis of disability between 2016 and 2019 that supported discrimination on the basis of disability, and 12 on the basis of national origin.

Table IV.89					
Tests by Protected Class (Test Results Support Allegation)					
State of North Dakota					
Type	2016	2017	2018	2019	Total
Disability	3	8	13	10	34
National Origin		1	9	2	12
Race/National Origin	5	6			11
Familial Status			2	4	6
Race				6	6
Sex			2		2
None (Control)	1				1
Total	9	15	26	22	72

I. FAIR HOUSING SURVEY RESULTS

The Fair Housing survey has a total of 65 responses. Respondents were most likely to be advocates followed by local governments and homeowners.

Table IV.90 What are your primary roles in the housing industry? State of North Dakota Fair Housing Survey	
Role	Total
Advocate	15
Appraisal	0
Banking/Finance	2
Construction/Development	2
Insurance	0
Law/Legal services	1
Local government	13
Property management	1
Real estate	1
Service Provider	10
Homeowner	12
Renter/Tenant	11

When asked how familiar they are with fair housing laws, most respondents indicated they were at least somewhat familiar, accounting to 34 respondents in the survey.

Table IV.91 How familiar are you with fair housing laws? State of North Dakota Fair Housing Survey	
Response	Total
Not Familiar	16
Somewhat Familiar	21
Very Familiar	12
Missing	16
Total	65

Most respondents also believed that fair housing laws are useful, accounting for 44 total responses. Some 11 respondents, or 16.9 percent, felt that fair housing laws are difficult to understand, while 26 respondents did not. Results were mixed when asked if fair housing laws are adequately enforced in the State of North Dakota. Less than half of respondents were aware of any educational activities or training opportunities, and 19 were aware of fair housing testing in their community. Some 17 respondents have participated in fair housing training.

Table IV.92 Federal and State Fair Housing Laws State of North Dakota Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws serve a useful purpose?	44	1	4	16	65
Do you think fair housing laws are difficult to understand or follow?	11	26	11	17	65
Do you feel that fair housing laws are adequately enforced in the State of North Dakota?	14	18	16	17	65
Based on your knowledge of fair housing law, do you think that additional groups should be protected under the State fair housing law?	19	12	17	17	65
Outreach and education activities, such as training and seminars, are used to help people better understand their rights and obligations under fair housing law. Are you aware of any educational activities or training opportunities available to you to learn about fair housing laws?	20	20	8	17	65
If you answered "yes" to the previous question, have you participated in fair housing activities or training?	17	13	1	34	65
Fair housing testing is often used to assess potential violations of fair housing law. Testing can include activities such as evaluating building practices to determine compliance with accessibility laws or testing if some people are treated differently when inquiring about available rental units. Are you aware of any fair housing testing of any sort in the State?	19	19	10	17	65

When asked to assess the level of fair housing outreach and educations activities in the State, most respondents that answered the question said there was too little. A similar response was seen for the current level of fair housing testing in the State.

Table IV.93 Fair Housing Barriers State of North Dakota Fair Housing Survey						
Question	Too Much	The Right Amount	Too Little	Don't Know	Missing	Total
Please assess the level of fair housing outreach and education activity in the State.	0	10	21	17	17	65
Please assess the current level of fair housing testing in the State.	1	6	16	.	17	65

One respondent was aware of impediments to fair housing choice in the private sector in the rental housing market, followed by the mortgage industry and housing construction or housing design fields. However, the majority of respondents were not aware of impediments in any of these areas.

Table IV.94 Fair Housing Testing and Activities State of North Dakota Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Are you aware of any impediments to fair housing choice in these areas in the State?					
The rental housing market? Example: Refusing to rent based on religion or color.	12	20	12	21	65
The real estate industry? Example: Only showing properties to families with children in certain areas.	6	17	20	22	65
The mortgage and home lending industry? Example: Offering higher interest rates to women or racial minorities.	9	15	20	21	65
The housing construction or housing design fields? Example: New rental complexes built with narrow doorways that do not allow wheelchair accessibility.	8	23	13	21	65
The home insurance industry? Example: Limiting policies and coverages for racial minorities.	7	19	18	21	65
The home appraisal industry? Example: Basing home values on the ethnic composition of neighborhoods.	5	20	18	22	65
Any other housing services?	2	14	19	30	65

When asked about barriers in the public sector, respondents were most likely to be aware of barriers that limit access to government services. This was followed by zoning laws and property assessment and tax policies.

Table IV.95 Fair Housing Barriers State of North Dakota Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Are you aware of any impediments or barriers to fair housing choice in the State regarding:					
Land use policies? Example: Policies that concentrate multi-family housing in limited areas.	8	15	19	23	65
Zoning laws? Example: Laws that restrict placement of group homes.	12	13	16	24	65
Occupancy standards or health and safety codes? Example: Codes being inadequately enforced in immigrant communities.	10	16	17	22	65
Property assessment and tax policies? Example: Lack of tax incentives for making reasonable accommodations or modifications for the disabled.	11	13	18	23	65
The permitting process? Example: Not offering written documents on procedures in alternate languages.	9	13	20	23	65
Housing construction standards? Example: Lack of or confusing guidelines for construction of accessible housing.	7	11	24	23	65
Neighborhood or community development policies? Example: Policies that encourage development in narrowly defined areas of the community.	8	14	21	22	65
Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?	16	15	12	22	65
Are there any other public administrative actions or regulations that act as barriers to fair housing choice?	7	15	18	25	65

Some nine respondents were aware of State fair housing regulations or plans in North Dakota, and six were aware of policies that affirmatively further fair housing in the State. Nine respondents felt there were specific geographic areas in the State that have fair housing problems.

Table IV.96 Federal and State Fair Housing Laws State of North Dakota Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Are you aware of any State fair housing ordinance, regulation, or plan in North Dakota?	9	19	14	23	65
Are you aware of any State policies or practices for "affirmatively furthering fair housing" in North Dakota?	6	16	20	23	65
Are there specific geographic areas in the State that have fair housing problems?	9	4	28	24	65

Section V. Fair Housing Goals and Priorities

Overview

Title VIII of the 1968 Civil Rights Act, also known as the Federal Fair Housing Act, made it illegal to discriminate in the buying, selling, or renting of housing based on a person's race, color, religion, or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected characteristics. Federal fair housing statutes are largely covered by the following:

1. The Fair Housing Act,
2. The Housing Amendments Act, and
3. The Americans with Disabilities Act.

The purpose of fair housing law is to protect a person's right to own, sell, purchase, or rent housing of his or her choice without fear of unlawful discrimination. The goal of fair housing law is to allow everyone equal opportunity to access housing.

Assessing Fair Housing

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. These provisions come from Section 808(e) (5) of the federal Fair Housing Act, which requires that the Secretary of HUD administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG)²³, and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As a part of the consolidated planning process, and entitlement communities that receive such funds from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH). This was described in the Analysis of Impediments to Fair Housing Choice and a Fair Housing Planning Guide offering methods to conduct such a study was released in March of 1993.

In 2015, HUD released a new AFFH rule, which gave a format, a review process, and content requirements for the newly named "Assessment of Fair Housing", or AFH. The assessment would now include an evaluation of equity, the distribution of community assets, and access to opportunity within the community, particularly as it relates to concentrations of poverty among minority racial and ethnic populations. Areas of opportunity are physical places, areas within communities that provide things one needs to thrive, including quality employment, high performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes.

²³The Emergency Shelter Grants program was renamed the Emergency Solutions Grants program in 2011.

The AFH would also include measures of segregation and integration and provide some historical context about how such concentrations became part of the community's legacy. Together, these considerations were then intended to better inform public investment decisions that would lead to amelioration or elimination of such segregation, enhancing access to opportunity, promoting equity, and hence housing choice. Equitable development requires thinking about equity impacts at the front end, prior to the investment occurring. That thinking involves analysis of economic, demographic, and market data to evaluate current issues for citizens who may have previously been marginalized from the community planning process. All this would be completed by using an on-line Assessment Tool.

However, on January 5, 2018, HUD issued a notice that extended the deadline for submission of an AFH by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020. Then, on May 18, 2018, HUD released three notices regarding the AFFH; one eliminated the January 5, 2018, guidance; a second withdrew the on-line Assessment Tool for local government program participants; and, the third noted that the AFFH certification remains in place. HUD went on to say that the AFFH databases and the AFFH Assessment Tool guide would remain available for the AI; and, encouraged jurisdictions to use them, if so desired.

Hence, the AI process involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, housing transactions, locations of public housing authorities, areas having racial and ethnic concentrations of poverty and access to opportunity. The development of an AI also includes public input, and interviews 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 fair housing issues/impediments.

In accordance with the applicable statutes and regulations governing the Consolidated Plan, the North Dakota Department of Commerce certifies that they will affirmatively further fair housing, by taking appropriate actions to overcome the effects of any impediments identified in the Analysis of Impediments to Fair Housing Choice and maintaining records that reflect the analysis and actions taken in this regard.

Overview of Findings

As a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback, the North Dakota Department of Commerce has identified a series of fair housing issues/impediments, and other contributing factors that contribute to the creation or persistence of those issues.

Table V.1, on the following page, provides a list of the contributing factors that have been identified as causing these fair housing issues/impediments and prioritizes them according to the following criteria:

1. High: Factors that have a direct and substantial impact on fair housing choice.
2. Medium: Factors that have a less direct impact on fair housing choice, or that the North Dakota Department of Commerce has limited authority to mandate change.
3. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that the North Dakota Department of Commerce has limited capacity to address.

Table V.1 Contributing Factors State of North Dakota		
Contributing Factors	Priority	Justification
Moderate to high levels of segregation	High	In 2017, black, American Indian, Native Hawaiian, and “other” race, households had a moderate to high level of segregation, according to the Dissimilarity Index.
Access to low poverty areas and concentrations of poverty	High	Low poverty index is markedly lower for Native American populations than white school proficiency, indicating inequitable access to low poverty areas.
Access to labor market engagement	Med	Native American households have less access to labor market engagement as indicated by the Access to Opportunity index. However, the State has little control over impacting labor market engagement on a large scale.
Access to School Proficiency	Med	Native American households have lower levels of access to proficient schools.
Insufficient affordable housing in a range of unit sizes	High	Some 19.6 percent of households have cost burdens. This is more significant for renter households, of which 35.7 percent have cost burdens. In addition, 70.9 percent of households below 30 percent HAMFI have cost burdens. This signifies a lack of housing options that are affordable to a large proportion of the population.
Black, American Indian, and Hispanic households have disproportionate rates of housing problems	High	Black, American Indian, and Hispanic households face a disproportionate rate of housing problems at rates of 50.7 percent, 35.0 percent, and 40.6 percent, respectively. This is compared to the State average of 22.0 percent.
Discriminatory patterns in Lending	Med	The mortgage denial rates for black, Native American, and Hispanic households are higher than the jurisdiction average according to 2008-2018 HMDA data.
Insufficient accessible affordable housing	High	The number of accessible affordable units may not meet the need of the growing elderly and disabled population, particularly as the population continues to age. Some 46.7 percent of persons aged 75 and older have at least one form of disability.
Discrimination on the basis of disability	High	Fair housing complaint data and fair housing testing results found disability to be the number one basis for discrimination in the State.
Lack of fair housing infrastructure	High	The fair housing survey and public input indicated a lack of collaboration among agencies to support fair housing.
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education.
Insufficient understanding of credit	High	The fair housing survey and public input indicated an insufficient understanding of credit needed to access mortgages.

FAIR HOUSING ISSUES, CONTRIBUTING FACTORS, AND PROPOSED ACHIEVEMENTS

Table V.2 summarizes the fair housing issues/impediments and contributing factors, including metrics, milestones, and a timeframe for achievements.

Table V.2

Fair Housing Goal	Impediments to Fair Housing Choice/ Contributing Factors	Fair Housing Issue	Recommended Actions
Promote affordable housing development in high opportunity areas	Moderate to high levels of segregation Access to low poverty areas Insufficient affordable housing in a range of unit sizes Black, American Indian, and Hispanic households have disproportionate rates of housing problems Discriminatory patterns in Lending	Segregation R/ECAPs Disproportionate Housing Need	Continue to promote homeownership and affordable rental opportunities in high opportunity areas with the use of CDBG, HOME, and HTF funds. Over the next five (5) years: 150 rental units added 500 rental units rehabilitated 150 homeowner housing units rehabilitated 100 households down payment and closing cost assistance for first-time homebuyers Track activities annually in the State's PER.
Promote community and service provider knowledge of ADA laws	Insufficient accessible affordable housing Discrimination on the basis of disability	Disability and Access	Continue to partner with the HPFHC to conduct tests on selected newly constructed housing units and apartment complexes. Record activities annually in the State's PER. Continue to partner with the HPFHC, DOLHR, and 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. Record activities annually in the State's PER.
Enhance community services in R/ECAPs	Access to low poverty areas Access to job proximity Access to school proficiency	Disparities in Access to Opportunity	Encourage increased public services and public investment in high poverty areas in the State. Record activities annually in the State's PER.
Increase fair housing outreach and education in the State	Moderate to high levels of segregation Access to low poverty areas and concentrations of poverty Discriminatory patterns in Lending	Fair Housing Enforcement and Outreach	Continue to partner with the High Plains Fair Housing Center (HPFHC), North Dakota Department of Labor and Human Rights (DOLHR), and other non-profit organizations to conduct outreach and education to professionals in the housing industry. Record activities annually in the State's PER. Enhance outreach and education to units of local government, as well as housing consumers, as it relates to affirmatively furthering fair housing and the duty to affirmatively further fair housing. Record activities annually in the State's PER. Conduct outreach and education of prospective housing consumers, 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. Record activities annually in the State's PER.

Section VI. Appendices

A. ADDITIONAL PLAN DATA

Table VI.1
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant

State of North Dakota
 2008–2018 HMDA Data

Race		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
American Indian	Originated	62	60	38	42	63	70	79	83	86	90	99	772
	Denied	15	12	13	11	21	28	18	25	14	10	19	186
	Denial Rate	19.5%	16.7%	25.5%	20.8%	25.0%	28.6%	18.6%	23.1%	14.0%	10.0%	16.1%	19.4%
Asian	Originated	54	62	46	35	62	91	99	124	129	99	100	901
	Denied	2	6	4	3	14	9	5	10	12	12	12	89
	Denial Rate	3.6%	8.8%	8.0%	7.9%	18.4%	9.0%	4.8%	7.5%	8.5%	10.8%	10.7%	9.0%
Black	Originated	37	39	31	30	52	74	76	65	76	91	111	682
	Denied	7	8	1	4	11	6	10	18	19	25	9	118
	Denial Rate	15.9%	17.0%	3.1%	11.8%	17.5%	7.5%	11.6%	21.7%	20.0%	21.6%	7.5%	14.8%
Pacific Islander	Originated	9	8	9	7	15	13	18	20	20	19	11	149
	Denied	1	1	2	0	1	2	5	1	4	0	0	17
	Denial Rate	10.0%	11.1%	18.2%	0.0%	6.2%	13.3%	21.7%	4.8%	16.7%	0.0%	0.0%	10.2%
White	Originated	6,428	6,337	6,410	6,346	7,834	8,253	8,356	8,262	7,875	7,658	7,624	81,383
	Denied	570	591	594	659	864	829	665	758	671	588	434	7,223
	Denial Rate	8.1%	8.5%	8.5%	9.4%	9.9%	9.1%	21.2%	8.4%	7.9%	7.1%	5.4%	8.2%
Not Available	Originated	273	341	219	199	201	278	293	381	359	312	537	3,393
	Denied	46	45	33	51	44	60	79	76	84	72	66	656
	Denial Rate	14.4%	11.7%	13.1%	20.4%	18.0%	17.8%	21.2%	16.6%	19.0%	18.8%	10.9%	16.2%
Not Applicable	Originated	2	4	0	0	3	5	4	2	3	1	7	31
	Denied	0	0	0	0	0	0	0	0	0	0	0	0
	Denial Rate	0.0%	0.0%	%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Total	Originated	6,865	6,851	6,753	6,659	8,230	8,784	8,925	8,937	8,548	8,270	8,502	87,324
	Denied	641	663	647	728	955	934	782	888	804	707	541	8,290
	Denial Rate	8.5%	8.8%	8.7%	9.9%	10.4%	9.6%	8.1%	9.0%	8.6%	7.9%	6.0%	8.7%
Hispanic	Originated	60	70	59	73	75	100	104	119	130	142	161	1,093
	Denied	11	18	4	13	20	20	8	19	10	17	18	158
	Denial Rate	15.5%	20.5%	6.3%	15.1%	21.1%	16.7%	7.1%	13.8%	7.1%	10.7%	10.1%	12.6%
Non-Hispanic	Originated	6,522	6,433	6,468	6,386	7,936	8,412	8,531	8,450	8,070	7,813	7,763	82,784
	Denied	581	599	605	654	891	847	701	799	712	615	441	7,445
	Denial Rate	8.2%	8.5%	8.6%	9.3%	10.1%	9.1%	7.6%	8.6%	8.1%	7.3%	5.4%	8.3%

Table VI.2
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant

State of North Dakota
 2008–2018 HMDA Data

Denial Reason	American Indian	Asian	Black	Pacific Islander	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	22	26	31	3	1,608	125	0	1,816	22
Employment History	6	5	6	0	325	16	0	358	6
Credit History	49	12	32	1	1,570	126	0	1,790	49
Collateral	13	10	9	2	1,046	119	0	1,199	13
Insufficient Cash	7	3	3	1	244	22	0	280	7
Unverifiable Information	0	1	4	3	207	27	0	242	0
Credit Application Incomplete	8	8	4	1	403	89	0	513	8
Mortgage Insurance Denied	0	0	0	0	15	1	0	16	0
Other	8	6	7	3	391	37	0	452	8
Missing	73	18	22	3	1,414	94	0	1,624	45
Total	186	89	118	17	7,223	656	0	8,290	158
% Missing	39.2%	20.2%	18.6%	17.6%	19.6%	14.3%	%	19.6%	28.5%

Table VI.3
Denial Rates by Gender of Applicant

State of North Dakota
 2008–2018 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2008	7.8%	10.1%	14.5%	0.0%	8.5%
2009	8.7%	8.8%	11.5%	0.0%	8.8%
2010	8.4%	9.4%	14.6%	%	8.7%
2011	9.5%	9.5%	23.7%	%	9.9%
2012	9.8%	11.8%	17.5%	0.0%	10.4%
2013	9.2%	9.7%	20.9%	0.0%	9.6%
2014	7.5%	8.5%	19.1%	0.0%	8.1%
2015	8.6%	9.6%	15.6%	0.0%	9.0%
2016	7.7%	10.3%	17.8%	0.0%	8.6%
2017	7.0%	9.0%	18.5%	0.0%	7.9%
2018	5.7%	5.9%	12.1%	0.0%	6.0%
Average	8.2%	9.3%	16.5%	0.0%	8.7%

Table VI.4
Loan Applications by Selected Action Taken by Gender of Applicant

State of North Dakota
 2008–2018 HMDA Data

Gender		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Male	Originated	5,175	5,035	4,994	5,021	6,318	6,661	6,816	6,654	6,285	6,018	5,901	64,878
	Denied	439	479	455	528	689	677	555	626	522	453	356	5,779
	Denial Rate	7.8%	8.7%	8.4%	9.5%	9.8%	9.2%	7.5%	8.6%	7.7%	7.0%	5.7%	8.2%
Female	Originated	1,475	1,557	1,607	1,506	1,763	1,933	1,889	2,033	2,039	2,004	2,277	20,083
	Denied	166	151	166	159	235	208	176	216	234	198	142	2,051
	Denial Rate	10.1%	8.8%	9.4%	9.5%	11.8%	9.7%	8.5%	9.6%	10.3%	9.0%	5.9%	9.3%
Not Available	Originated	213	255	152	132	146	185	216	248	221	247	311	2,326
	Denied	36	33	26	41	31	49	51	46	48	56	43	460
	Denial Rate	14.5%	11.5%	14.6%	23.7%	17.5%	20.9%	19.1%	15.6%	17.8%	18.5%	12.1%	16.5%
Not Applicable	Originated	2	4	0	0	3	5	4	2	3	1	6	30
	Denied	0	0	0	0	0	0	0	0	0	0	0	0
	Denial Rate	0.0%	0.0%	%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Total	Originated	6,865	6,851	6,753	6,659	8,230	8,784	8,925	8,937	8,548	8,270	8,502	87,324
	Denied	641	663	647	728	955	934	782	888	804	707	541	8,290
	Denial Rate	8.5%	8.8%	8.7%	9.9%	10.4%	9.6%	8.1%	9.0%	8.6%	7.9%	6.0%	8.7%

Table VI.5
Denial Rates by Income of Applicant

State of North Dakota
 2008–2018 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
\$30,000 or Below	16.9%	19.3%	17.3%	23.6%	21.3%	19.0%	18.5%	21.7%	22.0%	20.9%	12.7%	19.4%
\$30,001–\$50,000	9.0%	9.9%	9.9%	11.4%	13.2%	12.2%	11.2%	12.3%	12.8%	12.1%	8.2%	11.1%
\$50,001–\$75,000	7.2%	6.7%	7.7%	9.0%	9.6%	9.4%	8.0%	8.8%	9.0%	7.2%	6.3%	8.1%
\$75,001–\$100,000	6.5%	5.5%	7.0%	6.3%	7.9%	7.9%	6.5%	7.3%	6.2%	5.0%	4.6%	6.4%
\$100,001–\$150,000	6.0%	5.6%	4.4%	6.6%	7.0%	7.6%	5.5%	6.0%	5.0%	5.9%	4.3%	5.8%
Above \$150,000	5.6%	5.8%	5.9%	3.9%	7.0%	5.2%	4.5%	5.5%	4.6%	3.8%	3.9%	4.9%
Data Missing	20.0%	0.0%	0.0%	33.3%	0.0%	15.4%	8.3%	7.1%	0.0%	5.9%	12.5%	8.5%
Total	8.5%	8.8%	8.7%	9.9%	10.4%	9.6%	8.1%	9.0%	8.6%	7.9%	6.0%	8.7%

Table VI.6
Loan Applications by Income of Applicant: Originated and Denied

State of North Dakota
 2008–2018 HMDA Data

Income		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
\$30,000 or Below	Loan Originated	707	707	660	524	538	464	428	404	355	382	379	5,548
	Application Denied	144	169	138	162	146	109	97	112	100	101	55	1,333
	Denial Rate	16.9%	19.3%	17.3%	23.6%	21.3%	19.0%	18.5%	21.7%	22.0%	20.9%	12.7%	19.4%
\$30,001 –\$50,000	Loan Originated	1,913	2,061	1,848	1,663	1,886	1,793	1,598	1,706	1,548	1,515	1,549	19,080
	Application Denied	190	227	204	214	286	250	202	240	227	209	139	2,388
	Denial Rate	9.0%	9.9%	9.9%	11.4%	13.2%	12.2%	11.2%	12.3%	12.8%	12.1%	8.2%	11.1%
\$50,001 –\$75,000	Loan Originated	2,101	2,003	1,948	1,881	2,296	2,466	2,467	2,419	2,328	2,217	2,259	24,385
	Application Denied	164	144	162	186	243	257	214	232	229	173	151	2,155
	Denial Rate	7.2%	6.7%	7.7%	9.0%	9.6%	9.4%	8.0%	8.8%	9.0%	7.2%	6.3%	8.1%
\$75,001 –\$100,000	Loan Originated	1,118	1,081	1,084	1,234	1,605	1,807	1,834	1,914	1,871	1,794	1,786	17,128
	Application Denied	78	63	81	83	137	155	127	150	124	95	86	1,179
	Denial Rate	6.5%	5.5%	7.0%	6.3%	7.9%	7.9%	6.5%	7.3%	6.2%	5.0%	4.6%	6.4%
\$100,001 –150,000	Loan Originated	686	635	813	886	1,239	1,400	1,674	1,659	1,591	1,533	1,606	13,722
	Application Denied	44	38	37	63	93	115	98	105	83	96	72	844
	Denial Rate	6.0%	5.6%	4.4%	6.6%	7.0%	7.6%	5.5%	6.0%	5.0%	5.9%	4.3%	5.8%
Above \$150,000	Loan Originated	336	358	398	469	661	843	913	822	846	813	916	7,375
	Application Denied	20	22	25	19	50	46	43	48	41	32	37	383
	Denial Rate	5.6%	5.8%	5.9%	3.9%	7.0%	5.2%	4.5%	5.5%	4.6%	3.8%	3.9%	4.9%
Data Missing	Loan Originated	4	6	2	2	5	11	11	13	9	16	7	86
	Application Denied	1	0	0	1	0	2	1	1	0	1	1	8
	Denial Rate	20.0%	0.0%	0.0%	33.3%	0.0%	15.4%	8.3%	7.1%	0.0%	5.9%	12.5%	8.5%
Total	Loan Originated	6,865	6,851	6,753	6,659	8,230	8,784	8,925	8,937	8,548	8,270	8,502	87,324
	Application Denied	641	663	647	728	955	934	782	888	804	707	541	8,290
	Denial Rate	8.5%	8.8%	8.7%	9.9%	10.4%	9.6%	8.1%	9.0%	8.6%	7.9%	6.0%	8.7%

Race	\$30,000 or Below	\$30,001 – \$50,000	\$50,001 –\$75,000	\$75,001 –\$100,000	\$100,001 –\$150,000	> \$150,000	Data Missing	Average
American Indian	41.9%	21.7%	18.5%	14.0%	15.3%	14.5%	0.0%	19.4%
Asian	25.4%	13.2%	7.5%	5.7%	7.8%	4.2%	%	9.0%
Black	31.2%	19.3%	15.9%	6.5%	10.3%	9.2%	%	14.8%
Pacific Islander	20.0%	10.3%	10.6%	5.3%	11.1%	14.3%	%	10.2%
White	18.0%	10.5%	7.7%	6.1%	5.4%	4.5%	8.9%	8.2%
Not Available	46.2%	20.7%	14.5%	11.8%	11.5%	10.5%	0.0%	16.2%
Not Applicable	0.0%	0.0%	0.0%	0.0%	%	%	%	0.0%
Average	19.4%	11.1	8.1%	6.4%	5.8%	4.9%	8.5%	8.7%
Non-Hispanic	33.0%	15.8	12.5%	5.4%	8.0%	7.4%	0.0%	12.6%
Hispanic	18.1%	10.6	7.8%	6.2%	5.5%	4.6%	7.9%	8.3%

Race		\$30,000 or Below	\$30,001 – \$50,000	\$50,001 –\$75,000	\$75,001 –\$100,000	\$100,001 –\$150,000	> \$150,000	Data Missing	Total
American Indian	Loan Originated	43	184	207	166	105	65	2	772
	Application Denied	31	51	47	27	19	11	0	186
	Denial Rate	41.9%	21.7%	18.5%	14.0%	15.3%	14.5%	0.0%	19.4%
Asian	Loan Originated	44	191	260	150	95	161	0	901
	Application Denied	15	29	21	9	8	7	0	89
	Denial Rate	25.4%	13.2%	7.5%	5.7%	7.8%	4.25	%	9.0%
Black	Loan Originated	33	146	228	129	87	59	0	682
	Application Denied	15	35	43	9	10	6	0	118
	Denial Rate	31.2%	19.3%	15.9%	6.5%	10.3%	9.2%	%	10.2%
Pacific Islander	Loan Originated	8	35	42	36	16	12	0	149
	Application Denied	2	4	5	2	2	2	0	17
	Denial Rate	20.0%	10.3%	10.6%	5.3%	11.1%	14.3%	%	10.2%
White	Loan Originated	5,256	17,899	22,731	15,888	12,802	6,725	82	81,383
	Application Denied	1,153	2,107	1,883	1,031	725	316	8	7,223
	Denial Rate	18.0%	10.5%	7.7%	6.1%	5.4%	4.5%	8.9%	8.2%
Not Available	Loan Originated	136	621	915	755	614	350	2	3,393
	Application Denied	117	162	155	101	80	41	0	656
	Denial Rate	46.2%	20.7%	14.5%	11.8%	11.5%	10.5%	0.0%	16.2%
Not Applicable	Loan Originated	28	1	1	1	0	0	0	31
	Application Denied	0	0	0	0	0	0	0	0
	Denial Rate	0.0%	0.0%	0.0%	0.0%	%	%	%	0.0%
Total	Loan Originated	5,548	19,080	24,385	17,128	13,722	7,375	86	87,324
	Application Denied	1,333	2,388	2,155	1,179	844	383	8	8,290
	Denial Rate	19.4%	11.1%	8.1%	6.4%	5.8%	4.9%	8.5%	8.7%
Hispanic	Loan Originated	61	277	314	228	149	63	1	1,093
	Application Denied	30	52	45	13	13	5	0	158
	Denial Rate	33.0%	15.8%	12.5%	5.4%	8.0%	7.4%	0.0%	12.6%
Non-Hispanic	Loan Originated	5,320	18,174	23,166	16,122	12,965	6,955	82	82,784
	Application Denied	1,177	2,166	1,948	1,063	749	335	7	7,445
	Denial Rate	18.1%	10.6%	7.8%	6.2%	5.5%	4.6%	7.9%	8.3%

Table VI.9
Loans by Loan Purpose by HAL Status
 State of North Dakota
 2008–2018 HMDA Data

Loan Purpose		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
Home Purchase	HAL	513	345	60	83	109	69	39	29	20	17	14	1298
	Other	6,352	6,506	6,693	6,576	8,121	8,715	8,886	8,908	8,528	8,253	8,488	86026
	Percent HAL	7.5%	5.0%	0.9%	1.2%	1.3%	0.8%	0.4%	0.3%	0.2%	0.2%	0.2%	1.5%
Home Improvement	HAL	310	231	54	43	60	71	40	29	32	25	18	913
	Other	1,562	1,421	1,434	1,491	1,585	1,822	1,565	1,515	1,751	1,553	954	16653
	Percent HAL	16.6%	14.0%	3.6%	2.8%	3.6%	3.8%	2.5%	1.9%	1.8%	1.6%	1.9%	1.5%
Refinancing	HAL	1,265	763	87	100	87	64	41	28	28	21	20	2504
	Other	4,900	10,322	10,202	8,225	11,605	8,498	4,040	6,085	6,845	4,146	3,810	78678
	Percent HAL	20.5%	6.9%	0.8%	1.2%	0.7%	0.7%	1.0%	0.5%	0.4%	0.5%	0.5%	1.5%
Total	HAL	2,088	1,339	201	226	256	204	120	86	80	63	67	4730
	Other	12,814	18,249	18,329	16,292	21,311	19,035	14,491	16,508	17,124	13,952	14,222	182327
	Percent HAL	14.0%	6.8%	1.1%	1.4%	1.2%	1.1%	0.8%	0.5%	0.5%	0.4%	0.5%	2.5%

Table VI.10
HALs Originated by Race of Borrower
 State of North Dakota
 2008–2018 HMDA Data

Race	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
American Indian	2	4	1	1	6	2	2	0	0	1	0	19
Asian	2	2	0	0	1	0	0	0	1	0	1	7
Black	5	0	0	1	0	0	0	0	0	0	0	6
Pacific Islander	1	0	1	0	0	0	0	0	1	0	0	3
White	483	326	58	79	101	66	37	27	18	16	11	1,219
Not Available	20	11	0	2	1	1	0	2	0	0	2	39
Not Applicable	0	2	0	0	0	0	0	0	0	0	0	2
Total	513	345	60	83	109	69	39	29	20	17	14	1298
Hispanic	4	5	1	0	0	3	0	0	2	0	1	1,076
Non-Hispanic	492	329	58	82	106	65	39	28	18	17	12	81,459

Table VI.11
Rate of HALs Originated by Race/Ethnicity of Borrower

State of North Dakota
 2008–2018 HMDA Data

Race	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Average
American Indian	3.2%	6.7%	2.6%	2.4%	9.5%	2.9%	2.5%	0.0%	0.0%	1.1%	0.0%	2.5%
Asian	3.7%	3.2%	0.0%	0.0%	1.6%	0.0%	0.0%	0.0%	0.8%	0.0%	1.0%	0.8%
Black	13.5%	0.0%	0.0%	3.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.9%
Pacific Islander	11.1%	0.0%	11.1%	0.0%	0.0%	0.0%	0.0%	0.0%	5.0%	0.0%	0.0%	2.0%
White	7.5%	5.1%	0.9%	1.2%	1.3%	0.8%	0.4%	0.3%	0.2%	0.2%	0.1%	1.5%
Not Available	7.3%	3.2%	0.0%	1.0%	0.5%	0.4%	0.0%	0.5%	0.0%	0.0%	0.4%	1.2%
Not Applicable	0.0%	50.0%	%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	6.5%
Average	7.5%	5.0%	0.9%	1.2%	1.3%	0.8%	0.4%	0.3%	0.2%	0.2%	0.2%	1.5%
Hispanic	6.7%	7.1%	1.7%	0.0%	0.0%	3.0%	0.0%	0.0%	1.5%	0.0%	0.6%	1.5%
Non-Hispanic	7.5%	5.1%	0.9%	1.3%	1.3%	0.8%	0.5%	0.3%	0.2%	0.2%	0.2%	1.5%

Table VI.12
Loans by HAL Status by Race/Ethnicity of Borrower
 State of North Dakota
 2008–2018 HMDA Data

Race	Loan Type	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
American Indian	HAL	2	4	1	1	6	2	2	0	0	1	0	19
	Other	60	56	37	41	57	68	77	83	86	89	99	751
	Percent HAL	3.2%	6.7%	2.6%	2.4%	9.5%	2.9%	2.5%	0.0%	0.0%	1.1%	0.0%	2.5%
Asian	HAL	2	2	0	0	1	0	0	0	1	0	1	7
	Other	52	60	46	35	61	91	99	124	128	99	99	894
	Percent HAL	3.7%	3.2%	0.0%	0.0%	1.6%	0.0%	0.0%	0.0%	0.0%	0.8%	0.0%	1.0%
Black	HAL	5	0	0	1	0	0	0	0	0	0	0	6
	Other	32	39	31	29	52	74	76	65	76	91	111	676
	Percent HAL	13.5%	0.0%	0.0%	3.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.9%
Pacific Islander	HAL	1	0	1	0	0	0	0	0	1	0	0	3
	Other	8	8	8	7	15	13	18	20	19	19	11	146
	Percent HAL	11.1%	0.0%	11.1%	0.0%	0.0%	0.0%	0.0%	0.0%	5.0%	0.0%	0.0%	2.0%
White	HAL	483	326	58	79	101	66	37	27	18	16	11	1,219
	Other	5,945	6,011	6,352	6,267	7,733	8,187	8,319	8,235	7,857	7,642	7,613	80,082
	Percent HAL	7.5%	5.1%	0.9%	1.2%	1.3%	0.8%	0.4%	0.3%	0.2%	0.2%	0.1%	1.5%
Not Available	HAL	20	11	0	2	1	1	0	2	0	0	2	39
	Other	253	330	219	197	200	277	293	379	359	312	535	676
	Percent HAL	7.3%	3.2%	0.0%	1.0%	0.5%	0.4%	0.0%	0.5%	0.0%	0.0%	0.4%	1.2%
Not Applicable	HAL	0	2	0	0	0	0	0	0	0	0	0	2
	Other	2	2	0	0	3	5	4	2	3	1	7	29
	Percent HAL	0.0%	50.0%	%	%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	6.5%
Total	HAL	513	345	60	83	109	69	39	29	20	17	14	1298
	Other	6,352	6,506	6,693	6,576	8,121	8,715	8,886	8,908	8,528	8,253	8,488	86,026
	Percent HAL	7.5%	5.0%	0.9%	1.2%	1.3%	0.8%	0.4%	0.3%	0.2%	0.2%	0.2%	1.5%
Hispanic	HAL	4	5	1	0	0	3	0	0	2	0	1	1,076
	Other	56	65	58	73	75	97	104	119	128	142	160	16
	Percent HAL	6.7%	7.1%	1.7%	0.0%	0.0%	3.0%	0.0%	0.0%	1.5%	0.0%	0.6%	1.5%
Non-Hispanic	HAL	492	329	58	82	106	65	39	28	18	17	12	81,459
	Other	6,030	6,104	6,410	6,304	7,830	8,347	8,492	8,422	8,052	7,796	7,751	1,243
	Percent HAL	7.5%	5.1%	0.9%	1.3%	1.3%	0.8%	0.5%	0.3%	0.2%	0.2%	0.2%	1.5%

Table VI.13
Rates of HALs by Income of Borrower

State of North Dakota
2008–2018 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Average
\$30,000 or Below	10.9%	6.9%	2.1%	2.9%	2.4%	1.1%	1.4%	0.7%	0.6%	0.8%	0.0%	3.4%
\$30,001–\$50,000	7.3%	4.5%	0.6%	1.0%	1.4%	0.7%	0.5%	0.4%	0.5%	0.4%	0.3%	1.7%
\$50,001–\$75,000	6.7%	3.5%	0.6%	0.9%	0.9%	0.5%	0.4%	0.2%	0.2%	0.1%	0.1%	1.2%
\$75,001–\$100,000	7.0%	4.6%	0.8%	1.1%	1.2%	0.9%	0.3%	0.2%	0.1%	0.2%	0.2%	1.2%
\$100,00–\$150,000	6.7%	7.1%	1.0%	1.7%	1.5%	1.0%	0.4%	0.4%	0.1%	0.1%	0.1%	1.2%
Above \$150,000	9.5%	9.8%	1.3%	1.5%	1.7%	1.1%	0.5%	0.6%	0.5%	0.0%	0.2%	1.6%
Data Missing	0.0%	50.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.5%
Average	7.5%	5.0%	0.9%	1.2%	1.3%	0.8%	0.4%	0.3%	0.2%	0.2%	0.2%	1.5%

Table VI.14
Loans by HAL Status by Income of Borrower

State of North Dakota
2008–2018 HMDA Data

Income		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total
\$30,000 or Below	HAL	77	49	14	15	13	5	6	3	2	3	0	187
	Other	630	658	646	509	525	459	422	401	353	379	379	5,361
	Percent HAL	10.9%	6.9%	2.1%	2.9%	2.4%	1.1%	1.4%	0.7%	0.6%	0.8%	0.0%	3.4%
\$30,001–\$50,000	HAL	139	93	12	16	26	12	8	6	7	6	4	329
	Other	1,774	1,968	1,836	1,647	1,860	1,781	1,590	1,700	1,541	1,509	1,545	18,751
	Percent HAL	7.3%	4.5%	0.6%	1.0%	1.4%	0.7%	0.5%	0.4%	0.5%	0.4%	0.3%	1.7%
\$50,001–\$75,000	HAL	141	70	12	16	20	12	9	6	5	3	3	297
	Other	1,960	1,933	1,936	1,865	2,276	2,454	2,458	2,413	2,323	2,214	2,256	24,088
	Percent HAL	6.7%	3.5%	0.6%	0.9%	0.9%	0.5%	0.4%	0.2%	0.2%	0.1%	0.1%	1.2%
\$75,001–\$100,000	HAL	78	50	9	14	20	17	5	3	1	4	4	205
	Other	1,040	1,031	1,075	1,220	1,585	1,790	1,829	1,911	1,870	1,790	1,782	16,923
	Percent HAL	7.0%	4.6%	0.8%	1.1%	1.2%	0.9%	0.3%	0.2%	0.1%	0.2%	0.2%	1.2%
\$100,001–\$150,000	HAL	46	45	8	15	19	14	6	6	1	1	1	162
	Other	640	590	805	871	1,220	1,386	1,668	1,653	1,590	1,532	1,605	13,560
	Percent HAL	6.7%	7.1%	1.0%	1.7%	1.5%	1.0%	0.4%	0.4%	0.1%	0.1%	0.1%	1.2%
Above \$150,000	HAL	32	35	5	7	11	9	5	5	4	0	2	115
	Other	304	323	393	462	650	834	908	817	842	813	914	7,260
	Percent HAL	9.5%	9.8%	1.3%	1.5%	1.7%	1.1%	0.5%	0.6%	0.5%	0.0%	0.2%	1.6%
Data Missing	HAL	0	3	0	0	0	0	0	0	0	0	0	3
	Other	4	3	2	2	5	11	11	13	9	16	7	83
	Percent HAL	0.0%	50.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.5%
Total	Other	513	345	60	83	109	69	39	29	20	17	14	1298
	HAL	6,352	6,506	6,693	6,576	8,121	8,715	8,886	8,908	8,528	8,253	8,488	86,026
	Percent HAL	7.5%	5.0%	0.9%	1.2%	1.3%	0.8%	0.4%	0.3%	0.2%	0.2%	0.2%	1.5%