



## 2024-2026 Strategic Business Plan

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# 2024 Targeted Community Lending Plan

## Appendix 1



# 2024-2026 Strategic Business Plan

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

The purpose of the TCLP is to:

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

To achieve these objectives, the FHLB Des Moines:

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

### *Diversity, Equity and Inclusion (DEI)*

DEI continues to be an integral part of who the Bank is as a company - how we operate, how we see our future and how we interact with each other, external applicants, our members, suppliers and broker dealers. As an organization, we are committed to integrating and promoting DEI as a key aspect of our culture and in all relevant business functions, financial transactions and activities. After all, inclusion is about all of us, a community of individuals, each with their own unique talents, skillsets and voices, who make our organization better, stronger, not only for ourselves but for the communities and the members we serve.

The Bank is committed to a culture of diversity, equity and inclusion among the Bank's directors, AHAC, employees, grant recipients, and suppliers.

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

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

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



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## II. Market Research

### 1. Overview

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

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

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

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

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

### 2. FHLB Des Moines District Summary

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

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

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

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



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In 2021, independent third-party economist conducted an assessment of published market information pertaining to affordable rental and owner-occupied housing, as well as targeted community lending, for each of the 13 states in the Bank's district. The overarching affordable housing needs identified by these published market assessments corroborated what had been identified by the Bank's Advisory Council and further supported by widely accepted industry sources and the Bank's own market intelligence gained through dialogue with its members, housing associates, and community partners.

Collectively, these sources and the information presented in this Plan were used by the Bank to identify and assess the significant affordable housing needs that would be addressed through its 2024 AHP and related 2024 AHP scoring criteria.

### *3. Advisory Council Assessment of Priority Affordable Housing Needs*

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

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

### *4. Summary of Published Market Information for the Bank's 13 States*

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

In 2023, the Advisory Council refreshed state information as needed.

*Northern Midwest: Iowa, Minnesota, Missouri, North Dakota, South Dakota*

#### Iowa

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



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- Aging population and housing stock

Iowa Special Circumstances: Within its 2018 Assessment of Fair Housing, Iowa reported more acute need in urban areas that are growing faster than many rural areas.<sup>5</sup> The Iowa Housing Overview prepared by the Fiscal Services Division of the Legislative Services Agency in December 2022 identified several priority actions including: maintain existing and increase housing supply, especially in rural areas; promote availability of affordable housing to enhance the workforce as the population ages and more labor is needed to care for seniors; and build affordable and infill housing in cities to attract residents to the state.

### Minnesota

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

Minnesota Special Circumstance: Within Minnesota's Consolidated Plan, the State identifies a need for affordable housing for low-income households, largely due to escalating home costs. Leveraging funds from federal programs to provide more housing is recognized as a major challenge. Incentivizing and prioritizing housing development is a statewide housing goal.<sup>7</sup> In 2023, the state legislature approved \$1 billion for affordable rental and owner-occupied housing.

### Missouri

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

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

### North Dakota

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

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<sup>5</sup> [2018 State of Iowa Analysis of Impediments to Fair Housing Choice](#)

<sup>6</sup> [Minnesota Housing 2020-21 Affordable Housing Plan](#), Public Comment Draft, August 29, 2019

<sup>7</sup> [More Places to Call Home: Investing in Minnesota's Future – Report of the Governor's Task Force on Housing, August 2018](#)



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North Dakota Special Circumstances: The state expects that demographic shifts in the aging of baby boomers and the in-migration of younger households will continue to increase demand for rental and/or multi-family housing. According to the North Dakota Housing Finance Agency, the state's most prominent housing affordability challenges are cost burdened renters and homeowners, escalating costs, particularly for renters, and an aging housing stock requiring rehabilitation. There is an estimated 10 thousand housing unit shortage.<sup>8</sup>

### South Dakota

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

South Dakota Special Circumstances: Housing cost burden tends to be acute for Native American and Hispanic households. The state is confronting substandard housing conditions, which is being addressed by state and local governments and nonprofit organizations.<sup>9</sup>

### *Intermountain West: Idaho, Montana, Utah, Wyoming*

#### Idaho

- Rental housing for households with incomes at or below 30 percent of area median
- Homeownership for households with incomes at or below 50 percent of area median
- Rental housing for households with incomes at or below 80 percent of area median
- Housing for persons earning greater than 80 percent of area median

Idaho Special Circumstances: The most common housing challenge is cost burden as household incomes have not kept pace with escalating housing costs since 2000. The impact of market-rate or above market-rate property development on surrounding neighborhoods often leads to higher levels of evictions and displacement. Disinvestment or poor maintenance in rental housing is particularly acute for rural areas. The impact of these barriers has been higher for certain ethnic and racial populations as well as elderly residents.<sup>10</sup>

#### Montana

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

<sup>8</sup> <https://www.ndhfa.org/index.php/publications/>

<sup>9</sup> [South Dakota Housing Development Authority and Governor's Office of Economic Development 2018-2022 Five Year Housing and Community Development Consolidated Plan](#)

<sup>10</sup> [Idaho Housing and Finance Association Housing Information](#)

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Montana Special Circumstances: In general, Montana communities employ a minimum of land use regulations related to housing development. Generally speaking, the state has traditionally not funded housing assistance, which instead has been supported by federal funds and private donations. While the state's regulatory framework makes housing less expensive to develop, funding to incentivize affordable housing projects has been difficult to obtain. The state is exploring strategies to support funding for affordable housing through state and local jurisdictions.<sup>11</sup>

### Utah

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

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

### Wyoming

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

Wyoming Special Circumstances: Availability of sufficient resources to subsidize affordable housing is a state challenge. Affordable housing challenges are exacerbated by disparities in access to resources by special needs populations.<sup>12</sup> The extent of the issue requires a robust and regional response from all sectors of the community (public, private, non-profit) working collaboratively and transparently to build and engage community support and accelerate housing solutions.<sup>13</sup>

*Northern Pacific and Hawaii: Washington, Oregon, Alaska, Hawaii*

### Washington

- Affordable housing for households with incomes at or below 30 percent and 50 percent of area median
- Homeownership for households with incomes at or below 30 percent and 50 percent of area median

<sup>11</sup> [Montana Budget and Policy Center State and Local Strategies to Improve Housing Affordability](#)

<sup>12</sup> [2017 State of Wyoming Regional Assessment of Fair Housing](#)

<sup>13</sup> <https://www.tetoncountywy.gov/DocumentCenter/View/21911/2022-Teton-Region-Housing-Needs-Assessment>

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- Housing for homeless and special needs households, including veterans, and households carrying significant health care costs

Washington Special Circumstances: Statewide, the single largest affordable housing need is rental units for households earning up to 30 percent of area median income, particularly in the Puget Sound region and southeast and southwestern parts of the state. Washington has been working to incentivize multi-family housing in general and affordable multi-family housing in particular. The state recognizes that its housing stock of mostly single-family homes is not a match for the demands of its changing demographics driven by smaller and nonfamily households. The most severely cost burdened demographic is households under the age of 35. In addition, Washington identified that low-income and non-white households are more likely to face challenges related to housing discrimination.<sup>14</sup>

### Oregon

- Affordable housing, particularly rental housing, for households with incomes at or below 30 percent and 50 percent of area median income
- Expansion of Permanent Supportive Housing
- Affordable homeownership for households between 50 percent and 120 percent of area median income - increase rates of homeowners of color
- Increase rural affordable housing development
- Weatherization of energy-burdened households with incomes up to 60 percent of area median

Oregon Special Circumstances: Escalating housing prices, and a shortage of affordable housing units are the primary factors driving the state's housing needs. Housing affordability coupled with nation-leading rates of untreated addiction are driving high per capita rates of homelessness. Governor Kotek issued three executive orders in 2023 declaring a state of homeless emergency, including setting new housing production targets for the state. Housing needs are disproportionately greater for special needs populations, including people with disabilities, the elderly and people with substance abuse and behavioral health disorders. The state recently instituted a statewide elimination of exclusionary single-family zoning in an effort to mitigate underproduction of housing.

### Alaska

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

<sup>14</sup> [Washington State Department of Commerce Affordable Housing Needs Study – 2015](#), and [Puget Sound Regional Council Vision 2050 Housing Background Paper](#)



Alaska Special Circumstances: The rate of overcrowding in Alaska is twice the national average, with the challenge more acute in rural areas. In some rural areas, more than half of all households are overcrowded. The population of senior citizens is expected to nearly double by 2030. To keep pace, more than 300 assisted and independent living facility beds must be added each year. Due to the state's severe climate, there is a significant need for weatherization and energy efficiency of housing units to moderate energy expenses for cost burdened households.<sup>15</sup>

### Hawaii

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

*Hawaii Special Circumstances:* State policy is not favorable to single-family housing due to limited land mass. Subtracting open water, wetlands, and sloped areas, the percentage of land suitable for development is the lowest in the nation. Additionally, construction costs are above average and the regulatory environment and review process are barriers to production.<sup>16</sup>

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

Two of the Bank's U.S. territories, Guam and the Commonwealth of the Northern Mariana Islands, are located in the North Pacific Ocean and the third, American Samoa, is located in the South Pacific Ocean. Financial institution presence in these territories is limited. For example, there are five FHLB Des Moines members chartered in Guam and none chartered in American Samoa or the Commonwealth of the Northern Mariana Islands (CNMI). In 2023, at least one FHLB Des Moines member served markets in the CNMI, however, non-served markets in American Samoa.

### American Samoa

American Samoa is comprised of a group of islands. Of the three territories in the Bank's district, it is the closest to Hawaii. There are a total of 14 U.S. territories throughout the Caribbean Sea and Pacific Ocean. Among them, only people born in American Samoa are considered non-citizen nationals.<sup>17</sup> Notwithstanding their citizenship status, the people of American Samoa are known to have the highest per-capita rate of military participation of any U.S. state or territory.<sup>18</sup>

Approximately 90 percent of residents are Native Samoan, making it the most homogenous territory in the U.S. Of note, however, is that Native Samoans are not members of a federally recognized tribe. The American Samoan constitution upholds the matai leadership system and communal land ownership. Matai translates roughly to "title," and matai leaders oversee control of communal land that can only be owned, sold, and developed within small communities. This makes up 96 percent of all property

<sup>15</sup> [Alaska Housing Finance Corporation 2018 Statewide Housing Assessment](#)

<sup>16</sup> [Hawaii Housing Finance & Development Corporation: Hawaii's Housing Planning Study, 2019](#)

<sup>17</sup> [World Atlas: What are the US Territories?](#)

<sup>18</sup> [Brown Political Review: American Samoa Tribal Sovereignty - April 6, 2022](#)



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in American Samoa.<sup>19</sup> Samoan law restricts the sale of most property to anyone with less than 50 percent Samoan ancestry.<sup>20</sup>

Access to financial institutions is limited, and there are no FHLB Des Moines' members chartered there or serving the area. American Samoa is home to one of two public banks operating in the U.S. Notably, the other public bank is located in North Dakota, which is also a part of the Bank's district.<sup>21</sup>

There is not a Community Development Financial Institution<sup>22</sup> Tribally Designated Housing Entity,<sup>23</sup> or affordable housing project financed by low-income housing tax credits<sup>24</sup> in American Samoa.

The Samoa Housing Corporation is a state-owned enterprise that provides rental housing and financing for mortgage loans and other securities for housing purposes.<sup>25</sup>

The Development Bank of American Samoa (DBAS) provides affordable mortgage loans for new home construction and home repair as well as commercial loans to support business development. DBAS is also the conduit for federal assistance programs to facilitate housing for low-income families and individuals.<sup>26</sup> For example, DBAS administers HUD's HOME program and has been designated as lead authority for American Rescue Plan Act funds.<sup>27</sup>

### Guam

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

The indigenous people of Guam are Chamorro,<sup>28</sup> however, Chamorro is not a federally recognized tribe.

There are five FHLB Des Moines members chartered in Guam, two of which are credit unions. Two Community Development Financial Institutions serve the island, one of which is a credit union and the other is a loan fund.<sup>29</sup>

A total of 15 affordable housing projects providing approximately 1,300 units financed by low-income housing tax credits are located on Guam.<sup>30</sup> Approximately 30 percent of these units will revert to market rate housing by 2030.<sup>31</sup>

There is not a Tribally Designated Housing Entity serving the island.<sup>32</sup>

<sup>19</sup> [Brown Political Review: American Samoa Tribal Sovereignty - April 6, 2022](#)

<sup>20</sup> [ABC News: Not all born in American Samoa want US citizenship - February 10, 2020](#)

<sup>21</sup> [Washington Post: When Banks abandoned American Samoa...](#)

<sup>22</sup> [U.S. Department of Treasury: CDFI Certification](#). See Appendix for full list of Certified Native CDFIs.

<sup>23</sup> [U.S. Department of Housing and Urban Development: National Directory of Tribes and TDHEs by ONAP Regions](#)

<sup>24</sup> [LIHTC Database](#). Data available for projects placed in service through 2020.

<sup>25</sup> [Samoa Housing Corporation](#)

<sup>26</sup> [Development Bank of American Samoa](#)

<sup>27</sup> [Samoa News: DBAS designated to lead ARPA Affordable Home Loan Program](#), February 24, 2022

<sup>28</sup> [Britannica: Guam](#)

<sup>29</sup> [U.S. Department of Treasury: CDFI Certification](#)

<sup>30</sup> [LIHTC Database](#), data available for projects placed in service through 2020

<sup>31</sup> [Guam Housing Study and Needs Assessment](#), January 2020

<sup>32</sup> [US Department of Housing and Urban Development National Directory of Tribes and TDHEs by ONAP Regions](#)



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While a comprehensive affordable housing plan has not been developed, priority housing needs have been identified for the elderly, homeless, and special needs populations. Of note, the proportion of rental and owner-occupied units and monthly housing costs for each are nearly even.<sup>33</sup> In 2023, typhoon Mawar brought widespread flooding and power outages across much of the territory. Government agencies and non-profit organizations supported relief efforts.

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

### Commonwealth of the Northern Mariana Islands (CNMI)

CNMI is composed of 22 islands and islets and, like Guam, is located on the west side of the International Date Line. Some sources cite Chamorro as being the islands' indigenous people.<sup>34</sup>

Access to financial institutions is limited, and there are no FHLB Des Moines members chartered there, however, at least one FHLB Des Moines' member serves the area. Additionally, there is not a Community Development Financial Institution or Tribally Designated Housing Entity that does business in CNMI.

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

Among the 17 selection criteria set forth in the 2023-2024 Qualified Allocation Plan are projects that provide three or more bedrooms, commit to offer units for sale or lease to existing tenants after the compliance period, and that provide affordable housing on the islands of Tinian and Rota.<sup>35</sup>

Priority affordable housing and community lending needs include:

- Special needs and low- and moderate-income housing
- Sustaining affordable housing stock
- Increasing homeowner education and counseling
- Public facilities and improvements<sup>36</sup>

The Northern Marianas Housing Corporation (NMHC) serves the low- and moderate-income populations of Saipan, Tinian, and Rota. This organization administers federal housing programs and direct loans to qualified households for housing construction, developing and managing rental housing projects, and participating as a guarantor or trustee in housing loan programs. Shortages in construction labor and services have

<sup>33</sup> [Guam Housing Study and Needs Assessment](#), January 2020

<sup>34</sup> [Britannica: Chamorro](#)

<sup>35</sup> [Commonwealth of the Northern Mariana Islands Low Income Housing Tax Credit Program 2021 – 2022 Qualified Allocation Plan](#)

<sup>36</sup> Annual Community Assessment Report for Program Year 2020

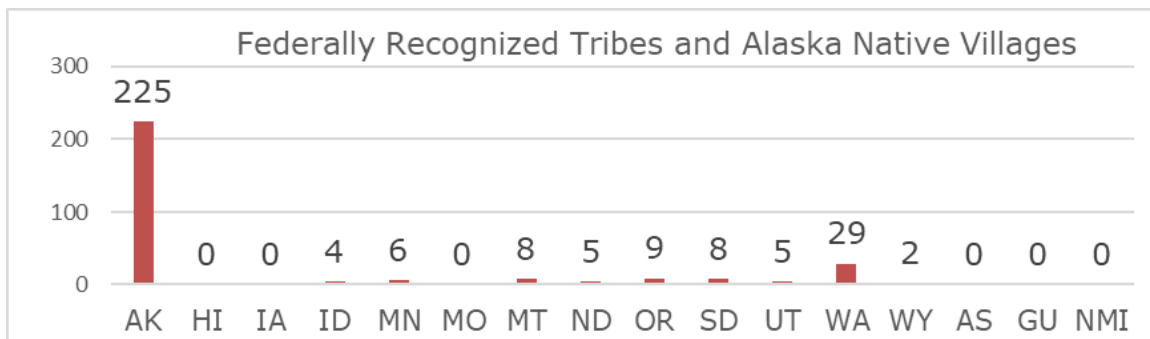
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been identified as challenges and the creation of new typhoon resistant homes as opportunities.<sup>37</sup>

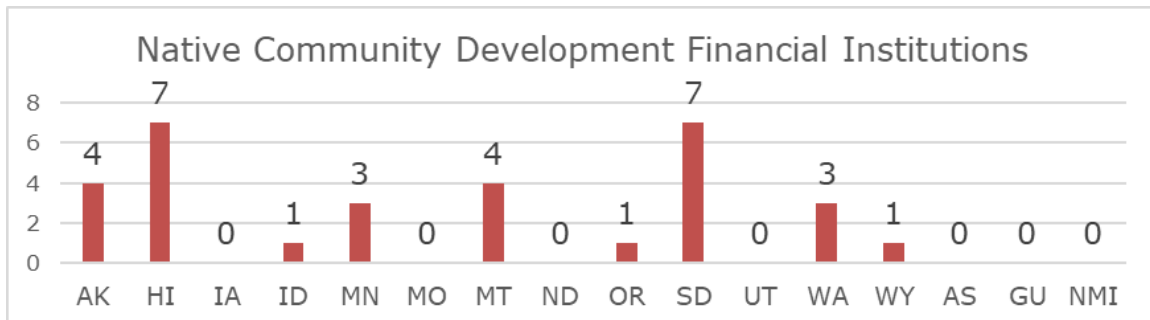
### 6. American Indian, Alaska Native, and Native Hawaiian

#### Overview

The Bank's district is home to approximately 30 percent of the U.S. Native population<sup>38</sup>. This population resides in urban and rural communities as well as on Tribal land, in Alaska Native Villages, on Department of Hawaiian Homelands, and in the district's U.S. territories. Moreover, in the U.S., there are 574 federally recognized tribes, 300 of which are located in the Bank's district.<sup>39</sup>



The FHLB Des Moines district is also home to 31 of a total 66 Native Community Development Finance Institutions.<sup>40</sup>



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

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

<sup>37</sup> Northern Marianas Housing Corporation Citizen Centric Report FY 2021

<sup>38</sup> Merging Markets, Housing Assistance Council, 2015

<sup>39</sup> [National Directory of Tribes and TDHs by ONAP Regions](#). See Appendix for full list of Native Alaska Villages and Federally Recognized Tribes.

<sup>40</sup> [US Department of the Treasury CDFI Certification](#). See Appendix for full list of Certified Native CDFIs.



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

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

### *Native American*

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

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

CICD research suggests four recommendations:

- "The federal government should continue to expand the financial capacity of Native community development financial institutions, or Native CDFIs, and other tribal institutions. Native CDFIs offer community-grounded credit solutions in Indian Country. Research suggests that the presence and activities of Native CDFIs increase the credit score of Indian Country residents that previously had the lowest credit scores
- The federal government can create a normalized and complementary interagency lending process in Indian Country

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<sup>41</sup> [Assessment of American Indian, Alaska Native, and Native Hawaiian Housing Needs](#)

- An improved title process on trust land would support housing development and tribal sovereignty
- Data on Native Americans and Indian Country programs should be improved. With some exceptions, existing sources are often insufficient to assess policy impacts or changes in population-level well-being. Illuminating economic conditions in Indian Country will require collaboration on methodologies and new financial resources to obtain sufficient statistical samples.”<sup>42</sup>

### *Alaska Native*

The 1971 Alaska Native Claims Settlement Act established the U.S. government’s current relationship with Alaska Natives. Under this Act, persons possessing “one-quarter or more Native blood” were automatically enrolled in a regional corporation, which is the governing body for overseeing land and resources of its members. In 1993, the U.S. Department of the Interior issued a ruling stating that Native villages and corporations have the same status as tribes and are, “entitled to the same protection, immunities, and privileges as other acknowledged tribes.”<sup>43</sup>

### *Native Hawaiian*

“Unlike its relationship with Native American Tribes and Alaska Native Villages, the U.S. government does not maintain a formal government-to-government relationship with the Native Hawaiian community as an organized, sovereign entity. No single agency in Hawaii is responsible for housing for the Native Hawaiian community, unlike the tribally designated housing entities (TDHEs) or tribal housing departments that operate housing programs in most other Native communities.”<sup>44</sup>

“In 1920, 39 years before statehood for Hawaii, the federal Hawaiian Homes Commission Act (HHCA) set aside approximately 200 thousand acres for the use of Native Hawaiians who are descendants ‘of not less than one-half part of the blood of the races inhabiting the Hawaiian Islands previous to 1778.’ The act established ‘a permanent land base for the benefit and use of Native Hawaiians.’ One of its goals was to enable ‘the preservation of the values, traditions, and culture of Native Hawaiians.’ HHCA created the Department of Hawaiian Home Lands (DHHL) to administer the home lands. Individuals who meet HHCA’s definition of a Native Hawaiian may assume a residential lease on the home lands if they can buy or build a home on the leased lot.”<sup>45</sup>

“A 2017 HUD study reported as a principal finding the significant need for affordable housing among Native Hawaiians, especially among Native Hawaiians waiting for a lease on the Hawaiian homelands. The assessment also found that many Native Hawaiians strongly prefer housing and communities that support multigenerational and extended family (‘ohana’) living and socializing, which is part of traditional Native Hawaiian culture.”<sup>46</sup>

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

<sup>43</sup>[Administration for Native Americans: American Indians and Alaska Native-What About Alaska?](#)

<sup>44</sup>[Housing Needs of Native Hawaiians: A Report from the Assessment of American Indian, Alaska Native, and Native Hawaiian Housing Needs](#)

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

<sup>46</sup>[Housing Needs of Native Hawaiians: A Report from the Assessment of American Indian, Alaska Native, and Native Hawaiian Housing Needs](#)



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

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

The culmination of priorities identified by the Advisory Council, the independent third-party economist's report of published market assessments, the Bank's outreach to members, housing associates, and community partners, as well as various industry publications are captured in the competitive AHP's 2024 scoring criteria, which may be viewed in its entirety in the 2024 AHP Implementation Plan. These priorities include but are not limited to awarding points for:

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

#### *Elevated Costs and Financing Gaps*

For several years, economic dynamics such as labor shortages and supply chain disruptions and, more recently, increasing interest rates have put significant pressure on costs for affordable housing acquisition, development, and rehabilitation. As discussed later in this Plan, elevated costs are particularly applicable in Hawaii. In response to these dynamics, for 2024, the Bank will increase the maximum grant amounts for its AHP General Fund and Down Payment Assistance Products. Refer to the 2024 AHP Implementation Plan for details.

#### *AHP Awards in Urban and Rural Areas*

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

2016: 54 AHP projects awarded – of which – 39 percent are rural

2017: 78 AHP projects awarded – of which – 45 percent are rural

2018: 109 AHP projects awarded – of which – 41 percent are rural

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





## 2024-2026 Strategic Business Plan

2019: 85 AHP projects awarded – of which – 44 percent are rural

2020: 63 AHP projects awarded – of which – 56 percent are rural

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

2022: 42 AHP projects awarded – of which – 48 percent are rural

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

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

2016: 68 percent units ≤ 50 percent Area Median Income (AMI) - of which - 46 percent units ≤ 30 percent AMI

2017: 67 percent units ≤ 50 percent AMI - of which - 46 percent units ≤ 30 percent AMI

2018: 66 percent units ≤ 50 percent AMI - of which - 55 percent units ≤ 30 percent AMI

2019: 60 percent units ≤ 50 percent AMI - of which - 55 percent units ≤ 30 percent AMI

2020: 56 percent units ≤ 50 percent AMI - of which - 44 percent units ≤ 30 percent AMI

2021: 53 percent units ≤ 50 percent AMI - of which – 33 percent units ≤ 30 percent AMI

2022: 59 percent units ≤ 50 percent AMI - of which – 30 percent units ≤ 30 percent AMI

### *AHP Awards for Native Projects*

The FHLB Des Moines has a long-standing commitment to helping to finance affordable housing that meets Native needs. The AHP scoring criteria prioritizes these needs in its District Priority with effective results. From 2019 through 2022, Native projects have been awarded, on average, 26 percent of total AHP funds. Additionally, when Native projects apply, they are awarded an average 69 percent of the time.<sup>49</sup>

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

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

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

2022: 59 percent of Native projects that applied were awarded, receiving 27 percent of AHP funds

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

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





## 2024-2026 Strategic Business Plan

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### *AHP Awards Throughout the Bank's District*

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

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

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

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

### **IV. Targeted Community Lending**

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

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

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

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

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<sup>50</sup> Figures consistent with data reports to FHFA. CIA data reported to FHFA annually; covers period 1.1.2016 through 12.31.2022.



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

#### *Community Investment Products*

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

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

- The competitive AHP provides equity to help finance the development, rehabilitation, or acquisition of affordable rental or owner-occupied housing. Members apply for the AHP subsidy on a housing sponsor's behalf on an annual basis
- Home\$tart provides equity in the form of down payment or closing cost assistance to eligible first-time homebuyers to help finance their purchase of an owner-occupied unit. Members apply for the subsidy on behalf of an eligible homebuyer. Funds are made available on a first-come, first-served basis
- NAHI is similar to Home\$tart in that it provides equity in the form of down payment assistance, and funds are made available to members on a first-come, first-served basis. However, NAHI funds are specifically set aside for members of a federally recognized tribe, members of an Alaska Native Village and regional corporation established pursuant to the Alaskan Native Claims Settlement Act, and for Native Hawaiians who are eligible to reside on Hawaiian Home Lands. Additionally, NAHI funds may only be used for home purchase in the Bank's district
- CIAs offer members a reduced-rate on certain advances with terms of 1- to 30-years for eligible housing and community economic development financing. Funds are available on an ongoing basis. The maximum outstanding CIA balance per member is limited to \$20 million

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

The Bank's President and Chief Executive Officer (CEO) or designee may waive the CIA member cap for eligible activities located in a federal disaster area to allow the rebuilding of communities affected by such disasters. The Bank reserves the right to cap the amount of CIAs to any single member for use in a federal disaster area. CIAs approved for this purpose must be originated within 18 months of the disaster declaration.

#### *Discretionary Programs*

In addition to the Community Investment products described above, the FHLB Des Moines contributes discretionary funds to provide members with incentives to expand their participation in financing economic opportunity for low- and moderate-income households and communities.



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In 2023, the Bank made a total of \$25 million in discretionary funding available. Of this amount, \$15 million was allocated to the Member Impact Fund, which is described below. The remaining \$10 million will be allocated during the third or fourth quarter of 2023.

The \$25 million in 2023 discretionary funds represents a contribution of five percent of the Bank's 2022's net income. This amount is additional to the 10 percent of net income the Bank contributes to its AHP and down payment products.

Member Impact Fund awards grants through two channels.

- \$15 thousand in direct grants were made in amounts of \$5 thousand to each of the U.S. territories of American Samoa, Guam, and the Commonwealth of the Northern Mariana Islands. These funds were granted to local non-profit and government organizations
- \$14.985 million was made available to provide working capital or capacity building funds to support nonprofit or government agencies' affordable housing or community development missions

These funds were awarded as matching grants in amounts up to \$3 of Bank funds for every \$1 contributed by the member. Eighty-six members received 501 awards that supported a broad range of organizations and activities such as down payment assistance, homeownership education, youth programs, financial literacy, food banks, job training, and much more.

### *Housing Associates and CDFIs*

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

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

In addition to offering the Community Investment products and discretionary programs described above, the Bank deployed several strategies to encourage members to increase their targeted community lending and affordable housing finance: (1) incorporate community investment objectives into the Bank's Strategic Business Plan; (2) provide intentional and targeted outreach to Native communities and areas of the Bank's district that have been challenged to receive AHP funding; (3) provide technical assistance to promote ease of use for members' and housing sponsors' participation; and (4) raise awareness about affordable housing and community development products and build relationships with community partners throughout our district.

### *(1) Affordable Housing and Community Development Mission in the Bank's Strategic Business Plan*

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



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featured in reports to the Board of Directors among a suite of metrics that are applicable to the SBP.

### *(2) Targeted Outreach to Native Communities and Areas of the Bank's District Challenged to Receive AHP*

#### *FHLB Des Moines Native Outreach Directory*

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

#### *South Dakota Native Homeownership Coalition*

The Bank's long-standing engagement with the South Dakota Native Homeownership Coalition continues to grow. Throughout 2023, the Bank management remained actively engaged in meetings, which provided opportunities to deepen relationships with Coalition membership including Native American Tribes, FHLB Des Moines member financial institutions and other advocates supporting Native homeownership in South Dakota.

#### *Targeted In-Person Outreach in Four States*

Bank management and staff hosted meetings in Hawaii, Idaho, Utah, and Wyoming with 112 members, community groups, and other stakeholders. Discussion covered a range of topics such as encouraging participation in the AHP General Fund and enhancing existing and building new relationships. As a result of this in-person outreach, the Bank saw a significant increase in 2023 AHP applications from Idaho, Utah, and Wyoming; the number of Hawaii applications in 2022 and 2023 remained steady at two applications in each year. Importantly, partners shared information about local market dynamics and affordable housing priorities. For example:

- Western states of Idaho, Utah, and Wyoming are experiencing rapidly increasing costs for land and existing housing stock, and identified affordable Native housing as an important need
- Hawaii's high development costs require large subsidies to close financing gaps and its lengthy permitting process extends development schedules
- Several of Hawaii's financing sources for affordable housing allow households to have incomes up to 120 percent of area median income
- Department of Hawaiian Homeland has lengthy wait lists and its land ownership requirements complicate debt financing and deed restriction



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### *(3) Product Promotions and Technical Assistance Resources*

Throughout the year, the Bank proactively provides its member and community partners with updates about Community Investment product availability, requirements, and other information. These promotions are distributed to approximately 2,900 members and other stakeholders, and feature notices about events such as but not limited to the opening of the AHP online application and the quarterly release of Down Payment Product funds.

In 2023, the Bank hosted an AHP webinar to encourage participation in the 2023 AHP General Fund. Webinar attendance exceeded 260 members and affordable housing practitioners.

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

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

#### *Customized AHP Technical Assistance*

Technical assistance for members. FHLB Des Moines staff meet with individual member institutions to explain the process for applying for AHP funds, and the member's role and responsibilities associated with the AHP application and award such as but not limited to the member's responsibilities for ensuring compliant use of funds. Additionally, Bank staff highlight the benefits AHP offers such as opportunities for the member to expand partnerships with nonprofit organizations and to its increase affordable housing finance and targeted community lending activities.

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

#### *Customized Down Payment Product Technical Assistance*

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



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Technical assistance for nonprofits. FHLB Des Moines provides technical assistance for the use of Down Payment Products, explains the members' role in deploying the funds and identifies resources to help the nonprofit select members with which to partner.

Information about the Down Payment Products' retention requirements and related compatibility with other down payment assistance funds is also discussed. This guidance strengthens nonprofits' ability to partner with financial institutions and to help eligible households finance the purchase of a home.

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

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

#### *FHLB Live*

In 2023, the Bank hosted FHLB Live in six states: Utah, Washington, Minnesota, North Dakota, Iowa, and Missouri. These in-person events were attended by more than 300 unique member institutions. Each of the meetings included a presentation on the Bank's Community Investment Products: Competitive AHP, Home\$tart, and NAHI. The presentation was designed to help members understand how to use these products to further affordable housing efforts in their communities. The agenda also featured a Housing Roundtable Discussion where members who have used the Bank's Community Investment Products shared their experiences.

#### *North Dakota and South Dakota Bankers Association Webinar*

FHLB Des Moines President and CEO Kris Williams facilitated an information session with members in North Dakota and South Dakota to highlight the impact of the Bank's strong member partnerships over the past 90 years and the impact those partnerships have on the communities the Bank serves. Ms. Williams also discussed the potential for changes resulting from the Federal Housing Finance Agency's review of the FHLBank System as well as the ramifications of these changes.

#### *Hawaii Inter-Agency Community Development Forum*

Bank staff attended the forum that was co-hosted by the FDIC and the Federal Reserve Bank of San Francisco. Approximately 80 individuals participated. Attendees included representatives from lending institutions, regulatory agencies, CDFIs, non-profits, and federal, state, and local governments. Session topics included developing housing in Hawaii, affordable housing development finance, and preparing individuals for homeownership.

#### *Hawaii Community Lending Forum*

Bank staff co-hosted a half day meeting with Hawaii Community Lending to raise awareness about AHP and how it can be deployed to meet the unique needs of Hawaii's affordable housing landscape such as Hawaii's lengthy permitting process, scarcity of land that can be developed, and high housing costs. 21 members, sponsors and developers attended.



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### *Guam Community Reinvestment Act (CRA) Roundtable*

Throughout 2023, the Bank was an active presenter and participant in the Guam CRA Roundtable. These virtual meetings convene monthly and are attended by a broad range of stakeholders such as the Guam Economic Development Authority, USDA, FDIC, and others. Meeting topics focus on Guam's affordable housing and economic development needs, opportunities, and partnerships.

### *Regional State Directors, U.S. Department of Housing and Urban Development*

Bank staff hosted a virtual meeting for the HUD State Directors from Wyoming, Montana, North Dakota, South Dakota, Utah, and Colorado to raise awareness about AHP and how funds may be leveraged to support local housing projects.

### *San Francisco Federal Reserve Community Development*

Bank staff hosted a virtual meeting with the Federal Reserve Bank of San Francisco's Community Development department to raise awareness about FHLB Des Moines' community investment products and services and promote partnerships between the organizations for supporting affordable housing and community development.

### *Inter-Agency CRA Working Group, Washington State*

Bank staff presented information about the availability of FHLB Des Moines' community investment products to various funders and community partners such as U.S. Department of Agriculture Rural Development, Small Business Administration, U.S. Department of HUD, Environmental Protection Agency, Washington State Economic Development Association, and others. The meeting covered a myriad of issues related to rural development and its unique challenges, including the need for affordable housing.

### *FDIC Hosted Expanding Access to Homeownership Resources to the Underserved in Missouri*

FHLB Des Moines presented information about homeownership resources for first-time homebuyers to more than 140 funders, community groups, and other stakeholders.

### *Minnesota Housing Partnership Roundtable*

FHLB Des Moines along with USDA, Greater Minnesota Housing Fund, Three Rivers CDC, and Rethos Policy Institute presented information on ways they can assist with the development of affordable housing. These housing stakeholders shared experiences and best practices to catalyze the development housing. This peer-to-peer exchange allows for the formation of regional partnerships through a team-based approach, capitalizing on local and expertise resources. This roundtable was attended by 31 stakeholders and focused on four cities in Southeastern Minnesota (Winona, Winnebago, Wabasha and Janesville).

### *Montana Housing Partnership Conference*

FHLB Des Moines joined federal and state government agencies along with local organizations to discuss trends in affordable housing. Topics included economic





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development, fair housing practices, the importance of supportive services, Native and rural home ownership, planning and zoning strategies and innovative housing designs promoting cost-effectiveness, affordability, energy efficiency and quick build-times. The conference was attended by more than 300 people.

### *Utah Housing Coalition Conference*

Bank staff joined 300 practitioners, funders, government agencies, and other stakeholders to discuss affordable housing needs across Utah. Examples of key themes include the importance of building capacity for the growing need of low income earners, flexible financing so that affordable housing projects are able to adapt to changing market dynamics, and rural area challenges with funding and developing projects.

### *Iowa Housing Conference*

The state's housing conference was attended by more than 750 industry stakeholders including Bank staff. Various affordable housing topics were discussed such as low-income housing tax credits, the economic outlook for the mortgage industry, fair housing practices, unconscious bias, ways to foster homeownership, and financial literacy among historically underserved populations, permanent supportive housing, and more.

### *2023 Mortgage Conference*

Bank staff presented information about our Down Payment Products at the Bank's 2023 Mortgage Conference. Among the more than 470 member attendees at the Conference was a FHLB Des Moines member who traveled over 7,000 miles from Guam to participate. During the presentation about Down Payment Products, key themes were: program requirements, how to access down payment funding, and opportunities to partner with non-profits for greater impact.

## **VII. 2024 Quantitative Targeted Community Lending Performance Goals**

*Refer to Appendix A for a report of progress to 2023 Performance Goals.*

2024 goals are:

- \$300 million in CIA originations
- Participate in and/or support 10 community lending conferences and workshops
- Promote business opportunities with existing and prospective housing associates
- Promote business opportunities with existing and prospective CDFI member



## Appendix 1

### Report of Progress to 2023 Performance Goals

As of October 31, 2023

- Goal: \$70 million in CIA originations
  - Progress: CIA originations totaled \$604.1 million
- Goal: Participate in and/or support 10 community lending conferences and workshops
  - *Progress: The Bank participated in and/or supported 28 community lending conferences and workshops*
- Goal: Promote business opportunities with existing and prospective housing associates
  - *Progress: Targeted outreach to seven housing associates*
- Goal: Promote business opportunities with existing and prospective CDFI members
  - *Progress: The Bank explored opportunities with 13 CDFIs, two of which are certified Native CDFIs*

## Appendix 2

### Federally Recognized Tribes and Alaska Native Villages<sup>51</sup>

<b>Alaska</b>	<b>225</b>
Agdaagux Tribe of King Cove	
Akiachak Native Community	
Akiak Native Community	
Alatna Village	
Algaaciq Native Village (St. Mary's)	
Allakaket Village	
Alutiiq Tribe of Old Harbor	
Angoon Community Association	
Anvik Village	
Arctic Village	
Asa'Carsarmiut Tribe	
Beaver Village	
Birch Creek Tribe	
Central Council of the Tlingit & Haida Indian Tribes	
Chalkyitsik Village	
Cheesh-Na Tribe	
Chevak Native Village	

<sup>51</sup> [National Directory of Tribes and TDHEs by ONAP Regions](#)

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Chickaloon Native Village	
Chignik Bay Tribal Council	
Chignik Lake Village	
Chilkat Indian Village	
Chilkoot Indian Association	
Chinik Eskimo Community	
Chuloonawick Native Village	
Circle Native Community	
Craig Tribal Association	
Curyung Tribal Council	
Douglas Indian Association	
Egegik Village	
Eklutna Native Village	
Emmonak Village	
Evansville Village	
Galena Village	
Gulkana Village Council	
Healy Lake Village	
Holy Cross Tribe	
Hoonah Indian Association	
Hughes Village	
Huslia Village	
Hydaburg Cooperative Association	
Igiugig Village	
Iqugmiut Traditional Council	
Ivanoff Bay Tribe	
Kaguyak Village	
Kaktovik Village	
Kasigluk Traditional Elders Council	
Kenaitze Indian Tribe	
Ketchikan Indian Community	
King Island Native Community	
King Salmon Tribe	
Klawock Cooperative Association	
Knik Tribe	
Kokhanok Village	
Koyukuk Native Village	
Levelock Village	
Lime Village	
Manley Hot Springs Village	
Manokotak Village	
McGrath Native Village	
Mentasta Traditional Council	
Metlakatla Indian Community, Annette Island Reserve	
Naknek Native Village	
Native Village of Afognak	
Native Village of Akhiok	
Native Village of Aleknagik	

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Native Village of Ambler	
Native Village of Atka	
Native Village of Atkasuk	
Native Village of Barrow Inupiat Traditional Government	
Native Village of Belkofski	
Native Village of Brevig Mission	
Native Village of Buckland	
Native Village of Cantwell	
Native Village of Chenega	
Native Village of Chignik Lagoon	
Native Village of Chitina	
Native Village of Chuathbaluk	
Native Village of Council	
Native Village of Deering	
Native Village of Diomedea	
Native Village of Eagle	
Native Village of Eek	
Native Village of Ekuk	
Native Village of Ekwok	
Native Village of Elim	
Native Village of Eyak	
Native Village of False Pass	
Native Village of Fort Yukon	
Native Village of Gakona	
Native Village of Gambell	
Native Village of Georgetown	
Native Village of Goodnews Bay	
Native Village of Hamilton	
Native Village of Hooper Bay	
Native Village of Kanatak	
Native Village of Karluk	
Native Village of Kiana	
Native Village of Kipnuk	
Native Village of Kivalina	
Native Village of Kluti Kaah	
Native Village of Kobuk	
Native Village of Kongiganak	
Native Village of Kotzebue	
Native Village of Koyuk	
Native Village of Kwigillingok	
Native Village of Kwinhagak	
Native Village of Larsen Bay	
Native Village of Marshall	
Native Village of Mary's Igloo	
Native Village of Mekoryuk	
Native Village of Minto	
Native Village of Nanwalek	
Native Village of Napaimute	



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Native Village of Napakiak	
Native Village of Napaskiak	
Native Village of Nelson Lagoon	
Native Village of Nightmute	
Native Village of Nikolski	
Native Village of Noatak	
Native Village of Nuiqsut	
Native Village of Nunam Iqua	
Native Village of Nunapitchuk	
Native Village of Ouzinkie	
Native Village of Paimiut	
Native Village of Perryville	
Native Village of Pilot Point	
Native Village of Point Hope	
Native Village of Point Lay	
Native Village of Port Graham	
Native Village of Port Heiden	
Native Village of Port Lions	
Native Village of Ruby	
Native Village of Saint Michael	
Native Village of Savoonga	
Native Village of Scammon Bay	
Native Village of Selawik	
Native Village of Shaktoolik	
Native Village of Shishmaref	
Native Village of Shungnak	
Native Village of Stevens	
Native Village of Tanacross	
Native Village of Tanana	
Native Village of Tatitlek	
Native Village of Tazlina	
Native Village of Teller	
Native Village of Tetlin	
Native Village of Tuntutuliak	
Native Village of Tununak	
Native Village of Tyonek	
Native Village of Unalakleet	
Native Village of Unga	
Native Village of Wales	
Native Village of White Mountain	
Nenana Native Association	
New Koliganek Village Council	
New Stuyahok Village	
Newhalen Village	
Newtok Village	
Nikolai Village	
Ninilchik Village	
Nome Eskimo Community	

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Nondalton Village	
Noorvik Native Community	
Northway Village	
Nulato Village	
Nunakauyarmiut Tribe	
Organized Village of Grayling	
Organized Village of Kake	
Organized Village of Kasaan	
Organized Village of Kwethluk	
Organized Village of Saxman	
Orutsararmiut Traditional Native Council	
Oscarville Traditional Village	
Pauloff Harbor Village	
Pedro Bay Village	
Petersburg Indian Association	
Pilot Station Traditional Village	
Pitka's Point Traditional Council	
Platinum Traditional Village	
Portage Creek Village	
Qagan Tayagungin Tribe of Sand Point Village	
Qawalangin Tribe of Unalaska	
Rampart Village	
Saint George Island	
Saint Paul Island	
Salamatof Tribe	
Seldovia Village Tribe	
Shageluk Native Village	
Sitka Tribe of Alaska	
Skagway Village	
South Naknek Village	
Stebbins Community Association	
Sun'aq Tribe of Kodiak	
Takotna Village	
Tangirnaq Native Village	
Telida Village	
Traditional Village of Togiak	
Tuluksak Native Community	
Twin Hills Village	
Ugashik Village	
Umkumiut Native Village	
Village of Alakanuk	
Village of Anaktuvuk Pass	
Village of Aniak	
Village of Atmautluak	
Village of Bill Moore's Slough	
Village of Chefornak	
Village of Clarks Point	
Village of Crooked Creek	

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Village of Dot Lake	
Village of Iliamna	
Village of Kalskag	
Village of Kaltag	
Village of Kotlik	
Village of Lower Kalskag	
Village of Ohogamiut	
Village of Red Devil	
Village of Sleetmute	
Village of Solomon	
Village of Stony River	
Village of Venetie	
Village of Wainwright	
Wrangell Cooperative Association	
Yakutat Tlingit Tribe	
Yupiit of Andreafski	
<b>Hawaii</b>	<b>0</b>
<b>Idaho</b>	<b>4</b>
Coeur D'Alene Tribe	
Kootenai Tribe of Idaho	
Nez Perce Tribe	
Shoshone-Bannock Tribes of the Fort Hall Reservation	
<b>Iowa</b>	<b>0</b>
<b>Minnesota</b>	<b>6</b>
Lower Sioux Indians Community in the State of Minnesota	
Minnesota Chippewa Tribe (Six component reservations: Bois Forte Band	
Prairie Island Indian Community of Minnesota	
Red Lake Band of Chippewa Indians	
Shakopee Mdewakanton Sioux Community of Minnesota	
Upper Sioux Community	
<b>Missouri</b>	<b>0</b>
<b>Montana</b>	<b>8</b>
Apsaalooke Tribe of Montana	
Fort Peck Tribes Assiniboine & Sioux	
Blackfeet Tribe	
Chippewa Cree Tribe	
Confederated Salish & Kootenai Tribes	
Fort Belknap Indian Community	
Little Shell Chippewa Tribe	
Northern Cheyenne Tribe	
<b>North Dakota</b>	<b>5</b>
Spirit Lake Sioux Tribe	
Standing Rock Sioux Tribe	
Three Affiliated Tribes of Fort Berthold	
Trenton Indian Service Area	
Turtle Mountain Band of Chippewa Indians	
<b>Oregon</b>	<b>9</b>
Burns Paiute Tribe	

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Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians	
Confederated Tribes of the Grand Ronde Community of Oregon	
Confederated Tribes of the Siletz Indians	
Confederated Tribes of the Umatilla Indian Reservation	
Confederated Tribes of the Warm Springs Reservation of Oregon	
Coquille Indian Tribe	
Cow Creek Band of Umpqua Tribe of Indians	
Klamath Tribes	
<b>South Dakota</b>	<b>8</b>
Cheyenne River Sioux Tribe	
Crow Creek Sioux Tribe	
Flandreau Santee Sioux Tribe	
Lower Brule Sioux Tribe	
Oglala Sioux Tribe	
Rosebud Sioux Tribe	
Sisseton Wahpeton Sioux Tribe	
Yankton Sioux Tribe	
<b>Utah</b>	<b>5</b>
Confederated Tribes of the Goshute	
Northwestern Band of the Shoshone Nation	
Paiute Indian Tribe of Utah	
Skull Valley Band of Goshute	
Ute Indian Tribe	
<b>Washington</b>	<b>29</b>
Confederated Tribes of the Chehalis Reservation	
Confederated Tribes of the Colville Reservation	
Confederated Tribes and Bands of the Yakama Nation	
Cowlitz Indian Tribe	
Hoh Indian Tribe	
Jamestown S'Klallam Tribe of Indians	
Kalispel Tribe of Indians	
Lower Elwha Klallam Tribe	
Lummi Tribe of the Lummi Reservation	
Makah Tribe	
Muckleshoot Indian Tribe	
Nisqually Indian Tribe	
Nooksack Indian Tribe	
Port Gamble S'Klallam Tribe	
Puyallup Tribe of Indians	
Quileute Tribe of the Quileute Reservation	
Quinault Indian Nation	
Samish Indian Nation	
Sauk-Suiattle Indian Tribe	
Shoalwater Bay Indian Tribe	
Skokomish Indian Tribe	
Snoqualmie Indian Tribe	
Spokane Tribe of Indians	
Squaxin Island Tribe	



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Stillaguamish Tribe of Indians	
Suquamish Tribe	
Swinomish Indian Tribal Community	
Tulalip Tribes of Washington	
Upper Skagit Indian Tribe	
<b>Wyoming</b>	<b>2</b>
Northern Arapaho Tribe	
Eastern Shoshone Tribe	
<b>American Samoa</b>	<b>0</b>
<b>Guam</b>	<b>0</b>
<b>Northern Mariana Islands</b>	<b>0</b>



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

	Native Population	State Population	% of State Population that is Native
Alaska	111,568	732,673	15.23
Hawaii	150,393	1,441,553	10.43
Idaho	25,719	1,900,923	1.35
Iowa	20,147	3,193,079	0.63
Minnesota	50,213	5,707,390	0.88
Missouri	29,203	6,168,187	0.47
Montana	64,293	1,104,271	5.82
North Dakota	37,747	774,948	4.87
Oregon	73,008	4,246,155	1.72
South Dakota	73,795	895,376	8.24
Utah	61,477	3,337,975	1.84
Washington	155,180	7,738,692	2.01
Wyoming	10,452	578,803	1.81
American Samoa	-	55,519	-
Guam	-	159,358	-
Commonwealth of the Northern Mariana Islands	-	53,883	-
TOTAL	863,195	38,088,785	2.27

<sup>52</sup> U.S. Census Bureau; 2021 ACS 1-Year Estimates Data Profiles; Native includes American Indian, Alaska Native, Native Hawaiian and Other Pacific Islander. Total population information is available for the US Territories of Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands but demographic information is not.



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### Appendix 4 Native CDFIs<sup>53</sup>

<b>Alaska</b>	<b>4</b>
Alaska Growth Capital BIDCO, Inc.	
Cook Inlet Lending Center, Inc.	
Haa Yakaawu Financial Corporation	
Spruce Root, Inc.	
<b>Hawaii</b>	<b>7</b>
Council for Native Hawaiian Advancement	
Hawaii Central Federal Credit Union	
Hawaii Community Lending Inc	
HAWAII FIRST FCU	
Kauai Government Employees Federal Credit Union	
Lei Hoolaha	
Molokai Community Federal Credit Union	
<b>Idaho</b>	<b>1</b>
Nimiipuu Community Development Fund	
<b>Iowa</b>	<b>0</b>
<b>Minnesota</b>	<b>3</b>
Indian Land Capital Company LLC	
Mni Sota Fund	
White Earth Investment Initiative	
<b>Missouri</b>	<b>0</b>
<b>Montana</b>	<b>4</b>
Montana Homeownership Network	
NACDC Financial Services Inc.	
Native American Development Corporation	
Peoples Partners for Community Development	
<b>North Dakota</b>	<b>0</b>
<b>Oregon</b>	<b>1</b>
Affiliated Tribes of Northwest Indians Financial Services	
<b>South Dakota</b>	<b>7</b>
Akiptan, Inc.	
Black Hills Community Loan Fund, Inc.	
Four Bands Community Fund, Inc.	
Lakota Federal Credit Union	
Lakota Fund, Inc., The	
Mazaska Owecaso Otipi Financial, Inc	
Sisseton Wahpeton Federal Credit Union	

<sup>53</sup> [US Department of the Treasury CDFI Certification](#), as of May 15, 2023



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<b>Washington</b>	<b>3</b>
Lummi Community Development Financial Institution	
Northwest Native Development Fund	
Taala Fund	
<b>Wyoming</b>	<b>1</b>
Wind River Development Fund	
<b>American Samoa</b>	<b>0</b>
<b>Guam</b>	<b>0</b>
<b>Northern Mariana Islands</b>	<b>0</b>

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

<b>Alaska</b>	<b>14</b>
Aleutian Housing Authority	
Association of Village Council Presidents Regional Housing Authority	
Baranof Island Housing Authority	
Bering Straits Regional Housing Authority	
Bristol Bay Housing Authority	
Copper River Basin Regional Housing Authority	
Interior Regional Housing Authority	
Kenaitze Salamatof TDHE	
Kodiak Island Housing Authority	
Metlakatla Housing Authority	
North Pacific Rim Housing Authority	
Northwest Inupiat Housing Authority	
Tagiugmiullu Nunamiullu Housing Authority	
Tlingit-Haida Regional Housing Authority	
<b>Hawaii</b>	<b>0</b>
<b>Idaho</b>	<b>3</b>
Coeur d'Alene Tribal Housing Authority	
Nez Perce Tribal Housing Authority	
Fort Hall Housing Authority	
<b>Iowa</b>	<b>0</b>
<b>Minnesota</b>	<b>7</b>
Grand Portage Housing Authority	
Leech Lake Housing Authority	
Lower Sioux Indian Housing Authority	
Mille Lacs Reservation Housing Authority	
Red Lake Reservation Housing Authority	
Upper Sioux Community of Minnesota Housing Department	
White Earth Reservation Housing Authority	
<b>Missouri</b>	<b>0</b>
<b>Montana</b>	<b>8</b>
Apsaalooke Nation Housing Authority	
Fort Peck Housing Authority	
Blackfeet Housing Authority	
Chippewa Cree Housing Authority	
Salish & Kootenai Housing Authority	
Fort Belknap Housing Authority	
Northern Cheyenne Tribal Housing Authority	
United Native American Housing Association (UNAHA)	
<b>North Dakota</b>	<b>5</b>
Spirit Lake Housing Corporation	
Standing Rock Housing Authority	
Fort Berthold Housing Authority	
Trenton Indian Housing Authority	
Turtle Mountain Housing Authority	

<sup>54</sup> [National Directory of Tribes and TDHEs by ONAP Regions](#)



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<b>Oregon</b>	<b>2</b>
Warm Springs Housing Authority	
Coquille Indian Housing Authority	
<b>South Dakota</b>	<b>7</b>
Cheyenne River Housing Authority	
Crow Creek Housing Authority	
Lower Brule Housing Authority	
Oglala Sioux (Lakota) Housing Authority	
Sicangu Wicoti Awayankapi Corporation (SWA)	
Sisseton Wahpeton Housing Authority	
Yankton Sioux Tribal Housing Authority	
<b>Utah</b>	<b>4</b>
Goshute Housing Authority	
Northwestern Band of the Shoshone Nation Housing Services	
Utah Paiute Tribe Housing Authority	
Ute Indian Tribally Designated Housing Entity	
<b>Washington</b>	<b>11</b>
Chehalis Tribal Housing Authority	
Colville Indian Housing Authority	
Lower Elwha Housing Authority	
Lummi Nation Housing Authority	
Muckleshoot Housing Authority	
Port Gamble S'Klallam Housing Authority	
Quileute Housing Authority	
Quinault Housing Authority	
Spokane Indian Housing Authority	
Swinomish Housing Authority	
Yakama Nation Housing Authority	
<b>Wyoming</b>	<b>2</b>
Eastern Shoshone Housing Authority	
Northern Arapaho Housing Authority	