

NINTH DISTRICT **Insight**

A Front-Line Perspective on the Economic Health of
Low- to Moderate-Income Communities

FOURTH QUARTER 2011

Published by the Community Development Department
of the Federal Reserve Bank of Minneapolis



Our Mission

The Community Development Department supports the Federal Reserve System's economic growth objectives by promoting community development through fair, impartial, and efficient access to credit and related financial services. We support investment in low- to moderate-income communities through information, outreach, and technical assistance. We serve the Ninth Federal Reserve District, which includes Minnesota, Montana, North Dakota, South Dakota, northwestern Wisconsin, and the Upper Peninsula of Michigan.

This report presents the findings from a survey of community development and service organizations that is designed to provide insight on 14 key indicators related to the economic health of low- to moderate-income (LMI) communities. Information included in this report is based on the front-line observations of representatives of 363 organizations that play a critical role in the development and stabilization of LMI communities in the Ninth Federal Reserve District. Respondents were asked to gauge changes in employment, housing, financial, and business conditions for the communities they serve by comparing current conditions with those that prevailed six months earlier. Collectively, their observations help provide a community-based perspective on issues that are important to the community development work of the Federal Reserve Bank of Minneapolis.

Survey respondents included: public and private economic developers; state workforce and job service centers; housing developers and housing service providers, including government agencies; Community Action Agencies and other organizations that provide basic-needs assistance; financial education providers; lenders; small business technical assistance providers; trade associations; tribal organizations; university extension services; community foundations; neighborhood organizations; and other nonprofit entities. The geographic locations of respondents were widely dispersed, representing more than 200 cities and townships across the Ninth District.

State	Proportion of Respondent Pool	Proportion of Ninth District Population*
Michigan (UP)	3%	3%
Minnesota	42%	60%
Montana	21%	11%
North Dakota	9%	8%
South Dakota	18%	9%
Wisconsin (NW)	8%	9%
*Based on 2010 American Community Survey five-year estimates.		

Respondents were asked to gauge changes in LMI community conditions using the response categories “decreased,” “stayed the same,” or “increased.” They were also invited to elaborate on their responses by providing comments. Respondents were instructed to answer questions based on firsthand observations and were encouraged to answer “don’t know” if they were not knowledgeable about an issue in the community. For each question, those who answered “don’t know” were excluded from the analysis.

Information for Ninth District Community Insight was gathered through an online survey developed and administered by the Community Development Department of the Federal Reserve Bank of Minneapolis. Responses included in this fourth quarter 2011 report were collected during the months of December 2011 and January 2012. Sixty percent of respondents were also participants in our previous poll conducted in the second quarter of 2011. There were no notable demographic differences between repeat and non-repeat respondents. Hence, the two groups were combined for analysis purposes. Percentages reported are for valid responses only, unless otherwise noted. Numbers might not equal 100 due to rounding. Caution should be used when interpreting the numbers for the Upper Peninsula of Michigan as they represent fewer than 20 cases.

LMI Economic Conditions at a Glance

Survey responses indicate that overall economic conditions for LMI communities in the Ninth District continue to deteriorate, but show less overall deterioration in comparison to six months ago. Indicators that showed the most overall deterioration Districtwide were:

- Demand for financial counseling in LMI communities;
- LMI households' use of alternative financial service providers;
- LMI households' ability to find affordable rental housing that meets their needs; and
- Homeownership opportunities for LMI buyers.

Survey results also point to some signs of improvement in economic conditions for LMI communities across the Ninth District. Indicators that showed increased overall improvement in comparison to six months ago were:

- Business openings in LMI communities in Montana, North Dakota, and South Dakota;
- Employment opportunities for disadvantaged and dislocated workers in LMI communities in North Dakota and South Dakota;
- Access to credit for business owners in LMI communities in North Dakota;
- Business closings and bankruptcy filings in LMI communities in North Dakota and South Dakota; and
- Job training opportunities for disadvantaged and dislocated workers in LMI communities in South Dakota.

LMI Economic Index Fourth Quarter 2011

The LMI Economic Index measures overall change in community conditions. The Index ranges from 0 (most deterioration in conditions) to 200 (most improvement in conditions) where a value of 100 equals neutral. A number less than 100 indicates overall deterioration and a number greater than 100 indicates overall improvement. Indicators are ordered from greatest Districtwide deterioration to least Districtwide deterioration based on fourth quarter 2011 survey responses. **Index values for second quarter 2011 are provided in parentheses for comparison where available.**

	Ninth District	Michigan (UP)	Minnesota	Montana	North Dakota	South Dakota	Wisconsin (NW)
Demand for financial counseling in LMI communities	43 (34)	40 (40)	31 (20)	53 (45)	68 (33)	59 (53)	20 (26)
Use of alternative financial service providers by LMI households	50 (--)	0 (--)	33 (--)	108 (--)	25 (--)	41 (--)	17 (--)
LMI households' ability to find affordable rental housing that meets their needs	50 (48)	62 (84)	40 (42)	57 (51)	34 (28)	71 (63)	47 (59)
Homeownership opportunities for LMI buyers	54 (69)	67 (60)	49 (80)	59 (47)	29 (31)	71 (85)	45 (55)
Amount of consumer debt carried by LMI households	56 (49)	25 (62)	40 (42)	79 (39)	61 (31)	83 (64)	41 (65)
Proportion of LMI households seeking services that do not have a bank account	61 (49)	50 (55)	50 (45)	73 (56)	57 (68)	76 (56)	61 (85)
LMI community organizations' confidence in ability to retain adequate levels of funding for staff and programs	66 (50)	36 (75)	63 (47)	75 (43)	63 (42)	83 (74)	43 (31)
Access to credit for business owners in LMI communities	62 (48)	14 (25)	50 (32)	69 (31)	116 (77)	74 (85)	33 (22)
Ability of business owners in LMI communities to recruit and retain workers with the "right" skills	68 (95)	44 (114)	80 (105)	72 (112)	62 (41)	57 (88)	56 (111)
Business closings and bankruptcy filings in LMI communities	73 (66)	33 (38)	63 (52)	67 (54)	117 (125)	100 (91)	65 (38)
LMI community organizations' ability to meet the needs of clients seeking assistance	80 (50)	54 (88)	72 (64)	92 (77)	80 (77)	93 (103)	63 (100)
Job training opportunities for disadvantaged and dislocated workers in LMI communities	82 (83)	67 (57)	75 (78)	82 (87)	75 (76)	100 (88)	84 (99)
Employment opportunities for disadvantaged and dislocated workers in LMI communities	87 (73)	63 (50)	68 (60)	92 (67)	132 (107)	106 (89)	85 (76)
Business openings in LMI communities	101 (95)	54 (50)	88 (82)	107 (98)	152 (144)	113 (104)	84 (91)

How the LMI Economic Index is calculated

Respondents were asked to gauge change in LMI community conditions by comparing current conditions with those that prevailed 6 months earlier using the response categories "decreased," "stayed the same," or "increased." For indicators where an increase is considered positive, the index numbers are calculated by subtracting the percent of respondents who answered "decreased" from the percent of respondents who answered "increased" and adding 100. For indicators where an increase is considered negative, the index numbers are calculated by subtracting the percent of respondents who answered "increased" from the percent of respondents who answered "decreased" and adding 100.

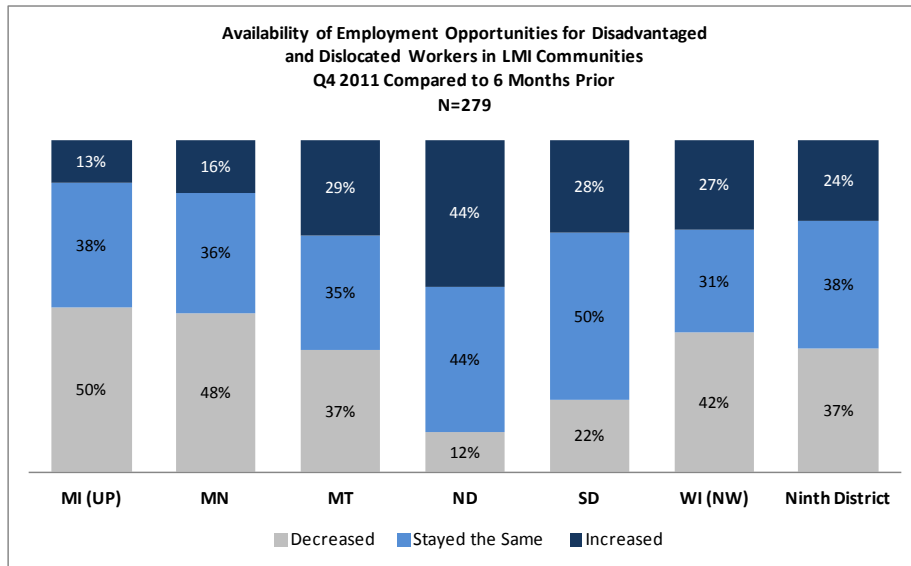
Following is an in-depth analysis of survey results, including state-by-state comparisons and illustrative quotes from respondents.

Employment and Job Training

Opportunities for disadvantaged and dislocated workers

Three-quarters (75%) of respondents said that the availability of employment opportunities for disadvantaged and dislocated workers in LMI communities has either remained the same or decreased over the past six months. According to respondents, many areas continue to experience slow economic growth; the jobs that are available for dislocated workers pay insufficient wages; and unemployment remains high for those with no post-secondary education, especially among populations of color.

Survey results indicate some scattered signs of improvement across the District; 1 in 4 respondents said that employment opportunities for disadvantaged and dislocated workers have increased over the past six months. Much of this growth can be attributed to the oil industry in eastern Montana and western North Dakota, which, as a byproduct, has also produced new jobs in construction, hospitality, and retail services. Respondents in these communities noted that, while the oil fields have been a powerful draw, the shortage of workforce housing has prevented some workers from accessing these high-wage opportunities. Overall, LMI communities in North Dakota and South Dakota appear to be faring better than those in other states.



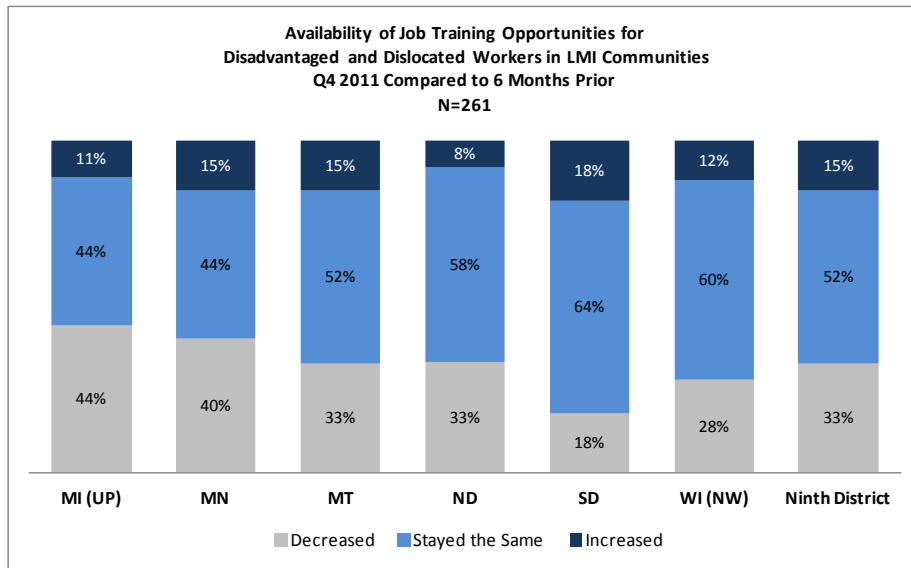
“Many of the manufacturing jobs that paid a living wage have moved out of the region or have been eliminated. Thus far, there have not been any jobs to replace them. Many of the [existing] jobs are part-time, temporary, or low-paying service jobs. Even families with two incomes are having a hard time making ends meet.”—Respondent in rural WI

*“There are fewer jobs available for people that do not have at least a bachelor’s degree. In this economy, several people with graduate degrees have been willing to accept lower-paid jobs, [thus] putting them in competition with BS/BA-prepared people. In turn, these workers [seek out employment] at a lower tier, which leaves few opportunities for low-skilled workers.”
—Respondent in urban MN*

*“Sharp disparities in employment opportunities for Native Americans and non-Natives exist. Lower rates of participation in higher education by Native Americans, anemic job growth on the reservation, and significant racial prejudice [are all contributing factors].”
—Respondent in rural MN*

“The opportunities in oil fields have proven to be a powerful draw, especially for people with existing applicable skills (truckers, mechanics, and heavy equipment operators). However, the long-distance commute and lack of housing for families has caused some workers to return to less well-paying jobs in northwestern Montana.”—Respondent in rural MT

According to most respondents, the number of job-training opportunities for disadvantaged and dislocated workers in LMI communities has either remained the same or decreased over the past six months. District-wide, one-third (33%) of respondents reported a decline in the availability of job training opportunities. Declines in state funding for job training programs and unfavorable market conditions were both cited as contributing factors. Respondents also commented on the growing demand for job training subsidies among employers looking to retrain workers for positions that require highly specialized skills.



“State funding for job training opportunities has been reduced and the employment opportunities for displaced workers are not sufficient to make up for the number of jobs lost.”—Respondent in rural MN

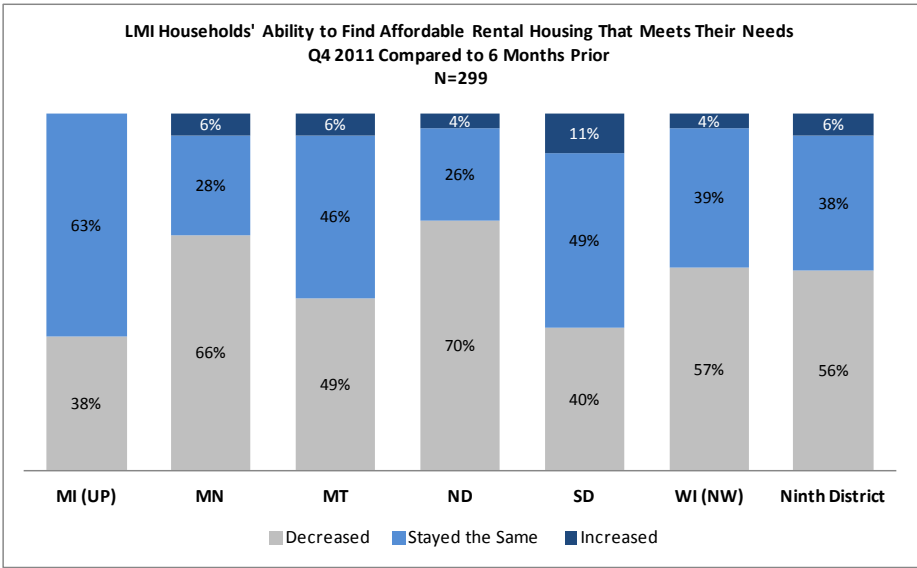
*“The Twin Cities has a pretty good job training infrastructure, but the job market continues to depress [job training program] outcomes.”
 —Respondent in urban MN*

*“We are seeing an increased need for on-the-job training funds for businesses that are willing to hire and train. We also have a serious shortage of funds for training [existing] workers in new technology and processes. Small employers, in particular, need better access to these types of job training funds.”
 —Respondent in rural MT*

Housing

Opportunities for Affordable Rental and Homeownership

Across the Ninth District, many respondents expressed concern about the shrinking supply of affordable rental housing and the recent cuts to federal housing programs that support affordable rental opportunities. Districtwide, more than half (56%) of respondents reported that the ability of LMI households to find affordable rental housing that meets their needs has decreased compared to six months ago. In Eastern Montana and western North Dakota, LMI renters have been particularly challenged by the influx of oil field workers who are able to pay a much higher price for existing rental units. Landlords have responded by raising rents, making it very difficult to find affordable rental housing. Two-thirds (66%) of Minnesota-based respondents also reported a decrease in LMI households’ ability to find affordable rental housing.



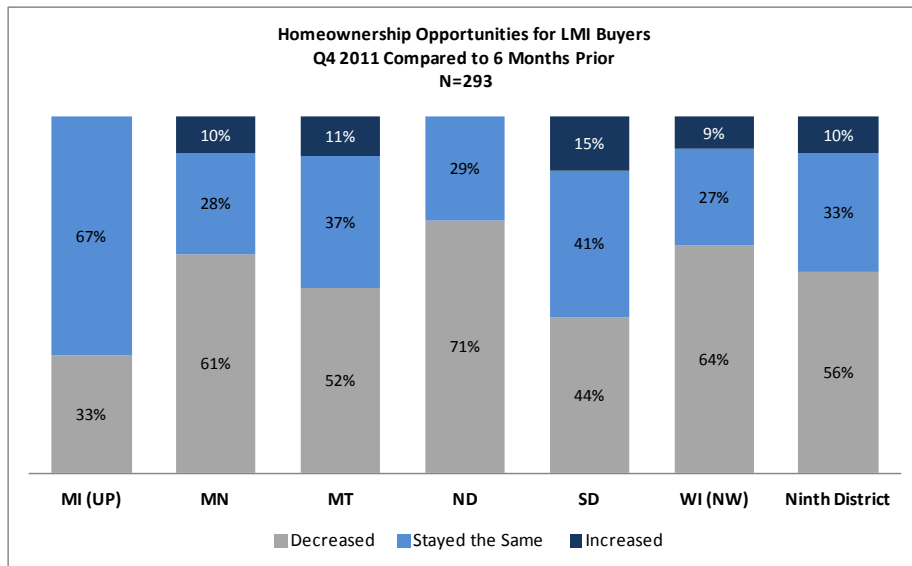
“Quality affordable rental housing has gotten more difficult to secure in the Twin Cities.”—Respondent in urban MN

“In western North Dakota, rental rates range from \$985 per month for a one-bedroom to \$2,895 for a three-bedroom unit. Although wages have increased for some of our service industry jobs, these wages are not enough to cover rent, utilities, food, and other basic necessities.”—Respondent in rural ND

“We continue to see long waiting lists for affordable housing and it seems that homeownership opportunities have dwindled [in] the foreclosure fallout.”
—Respondent in rural MN

“The decrease in federal CDBG [Community Development Block Grant] and HOME [HOME Investment Partnership Program] funds has reduced the ability of housing developers to fill funding gaps in development projects. Administrative funds for housing subsidy programs have also decreased.”—Respondent in mixed urban-rural MT

Survey responses indicate that there has been an overall decline in homeownership opportunities for LMI households, too. Districtwide, more than half (56%) of respondents reported a decrease in ownership opportunities for LMI buyers. Although interest rates and home prices remain competitive, more stringent loan criteria have made it difficult for many LMI households to obtain a mortgage. According to respondents, these tight credit conditions are exacerbating the rental housing shortage by preventing some would-be buyers from moving from rental to homeownership. In a few LMI communities across the District, Neighborhood Stabilization Program funds provided by the federal government have been used to generate new affordable homeownership opportunities.



“Community banks are less able to offer mortgages for affordable housing [than in the past]. For many LMI buyers, a 20 percent down payment is not possible. [It seems that] bankers are having difficulty complying with regulations and offering mortgages to local buyers.”—Respondent in rural ND

“Stricter banking regulations have made it almost impossible for LMI families to obtain [home] loans in the Missoula area. These stricter regulations are not necessarily a bad thing, but the inability of families to move to homeownership only exacerbates Missoula’s already critical rental housing shortage.”—Respondent in mixed urban-rural MT

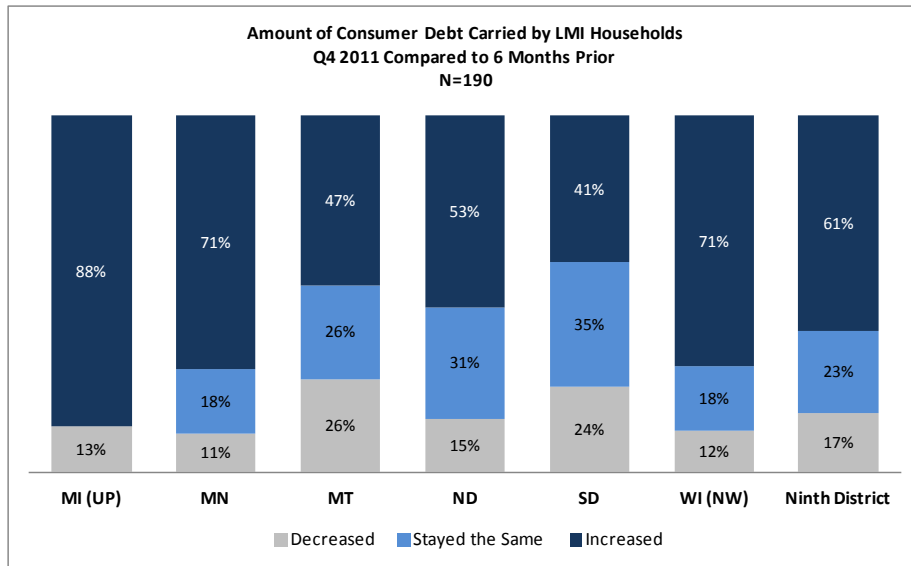
“Housing has become more affordable as a result of the foreclosure crisis. However, credit has become tighter and down payments have increased. So, even though [ownership] housing is much more affordable now than it was before the Great Recession, many LMI households are unable to access it.”—Respondent in mixed urban-rural MN

*“Thanks to a federal Neighborhood Stabilization Program grant, we were able to add several new, affordable homes to our city and create an efficient and effective partnership to plan for future affordable homes.”
—Respondent in rural SD*

Household Financial Well-Being

Consumer debt, financial counseling, and the use of alternative financial services

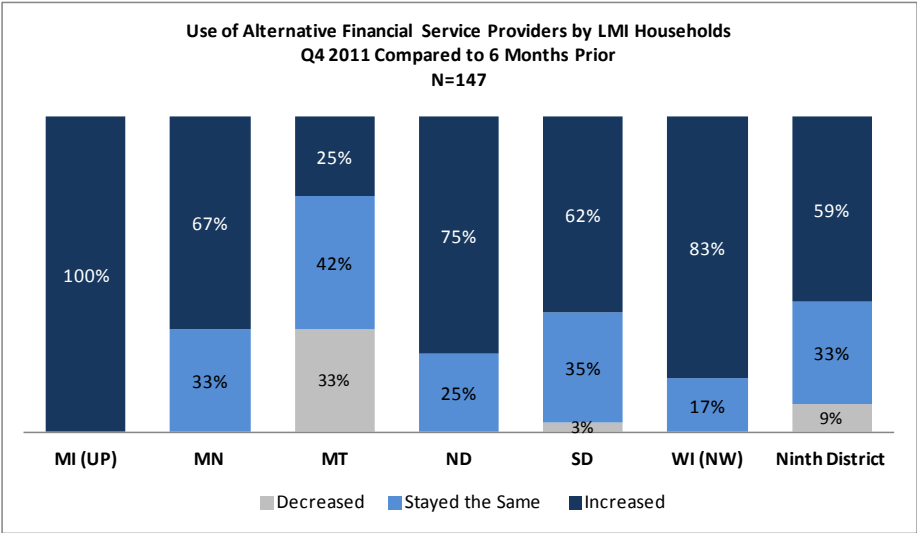
Almost two-thirds (61%) of respondents said that, in the LMI communities they serve, the amount of consumer debt households are carrying has increased over the past six months. However, one-quarter of respondents in South Dakota and Montana (24% and 26%, respectively) said they have witnessed decreases. According to respondents, many LMI consumers are relying on credit to pay for basic living needs such as food, transportation, and health care. A few respondents noted employers' increased reliance on credit scores to make hiring decisions and expressed concern about the negative effects of poor credit on employment opportunities.



“Many households are maxed out on credit. LMI households with laid-off workers are having a difficult time making ends meet. They are behind on house and utility payments and local [emergency] resources have fewer funds available to help them get ahead.”—Respondent in rural MN

“We are seeing more people use credit cards for everyday expenses such as [gasoline] and groceries.”—Respondent in rural MI

In surveying consumer credit conditions, we also asked about households’ use of alternative financial services, such as payday lenders. In all states except Montana, more than 60 percent of respondents reported increased use of alternative financial service providers by LMI households in the last six months. Montana recently passed legislation that capped the interest rates of payday lenders at 36 percent. In response, a majority of these lenders closed their doors because of limited profitability. While several respondents viewed this as a victory against predatory lending in Montana, they noted that many LMI households have turned to pawn shops and online payday lenders to meet their ongoing credit needs.



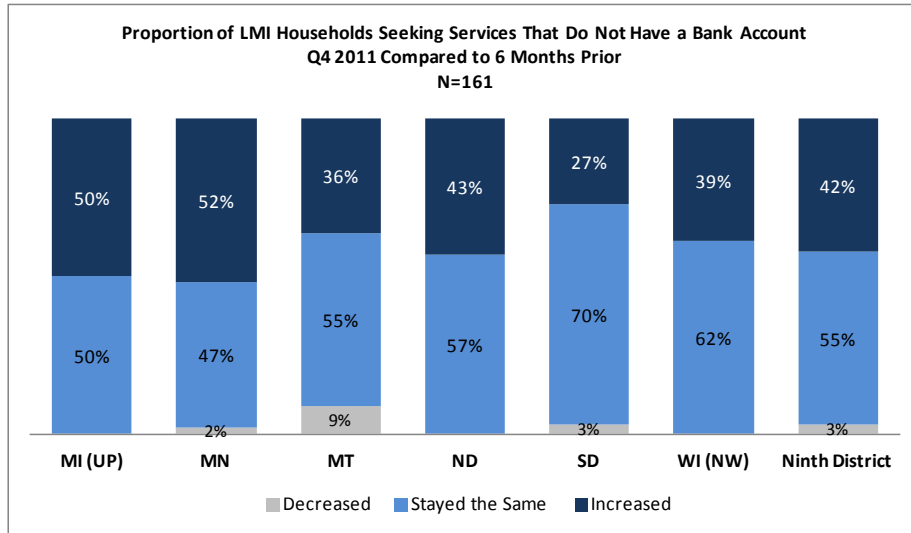
“[Use of payday lenders] has decreased due to a new state law that caps the amount of interest lenders are allowed to charge. However, there has been an increase in activity at local pawn shops.”—Respondent in mixed urban-rural MT

“Families are becoming desperate, especially as unemployment insurance ends. Those who have always struggled seem to be using more alternative lenders.”—Respondent in mixed urban-rural WI

“We have seen an increase in check-cashing and payday businesses opening, which indicates that more people are [utilizing] this option.”—Respondent in urban WI

“We have found that people who use alternative financial service providers tend to have lower incomes and are without a bank account. For many households, the need for credit is tied in to health care costs, education, and other basic needs as opposed to [commercial] debt.”—Respondent in urban MN

Survey responses suggest that the proportion of LMI households without a bank account continues to remain steady or is on the rise in comparison to six months ago. Districtwide, more than one-third (42%) of respondents reported an increase in their proportion of clients without a bank account, especially among households of color. Respondents’ comments suggest that not having the minimum deposit required to open and maintain an account is one of the primary reasons why many LMI households remain unbanked. According to respondents in Indian Country, the lack of access to depository institutions in general is another contributing factor when it comes to the high rate of American Indian households without a bank account.

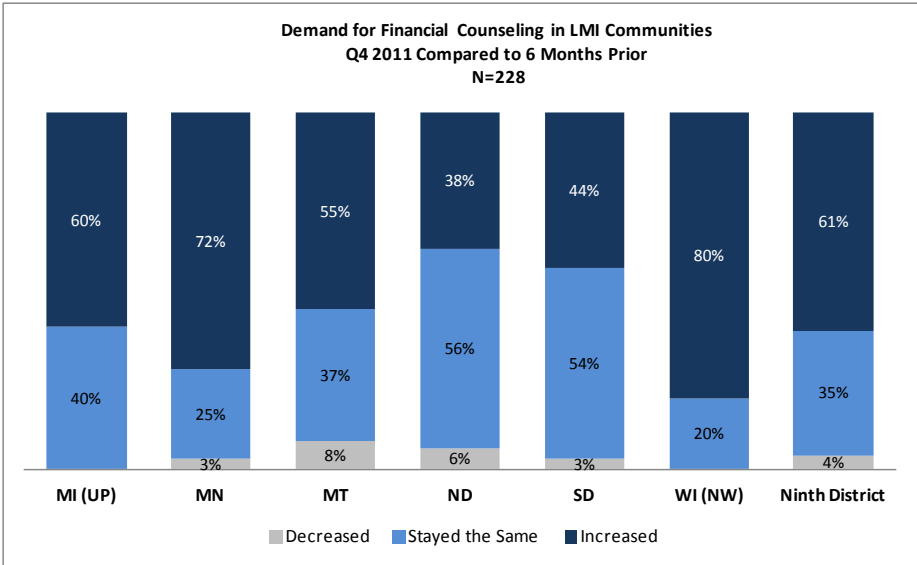


“Access to branch banks is limited [in reservation areas]. Tribal members have to travel great distances to access banking services, and the only bank available on the reservation is not used much due to lack of choice.”
 —Respondent in rural MT

“We have [seen] a higher percentage of unbanked people of color.”—Respondent in urban ND

Survey results indicate change in demand for financial counseling services in LMI communities across the Ninth District is mixed. Districtwide, a majority of respondents (61%) reported seeing an increase in the demand for financial counseling over the last six months. However, some respondents noted that the increase in demand for services was due to a loss of area service providers rather than an overall increase in the number of households requesting assistance.

A handful of respondents said they had witnessed an actual decrease in the demand for financial counseling services in the past six months, although the reasons for the decline are unknown. While the finances of some households may have improved, respondents’ comments suggest that current financial education opportunities may not be meeting the needs of consumers. Needs for more individualized and culturally specific counseling were both cited.



“The need for our foreclosure counseling services has skyrocketed. When we meet with these families, the need for earlier credit counseling is highlighted, as well as the increased use of payday lenders and other alternative financial services in order to pay the bills.”—Respondent in urban MN

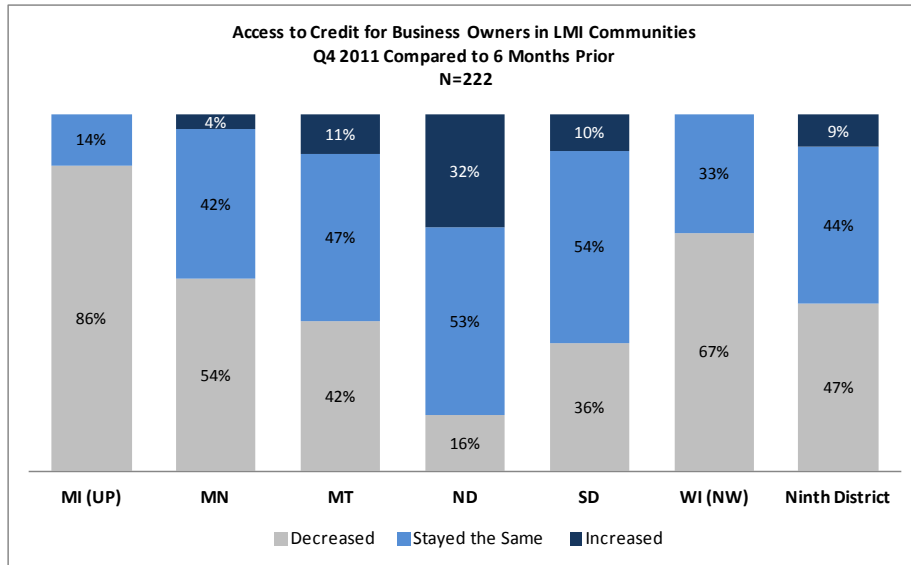
“Most data that we have seen indicates that household debt has increased in general for families of LMI status. Demand for financial counseling seems to be relatively stable in comparison to six months ago, but the elimination of funding has increased demand due to a decrease in available service providers.”—Respondent in rural MN

Business Conditions

Start-ups and closings, access to credit, and the ability to find qualified workers

Survey results indicate an overall negative change in credit conditions for business owners in LMI communities. Districtwide, almost half of respondents (47%) said that the ability of business owners to obtain the amount of credit they need has decreased in comparison to six months ago. According to respondents, the deterioration in access to credit has been particularly noticeable for start-ups and less established business owners. In some cases, entrepreneurs have relied on community development financial institutions, or CDFIs, to fill the gaps created by decreased lending from traditional financial institutions.

Respondents’ comments suggest that, in some parts of Montana and South Dakota, credit access has loosened in recent months. Overall, credit trends appear much more favorable in North Dakota than in other parts of the District. In fact, one-third (32%) of respondents in North Dakota reported an increase in access to credit for business owners in LMI communities in the last six months, compared to less than 12 percent in other states.

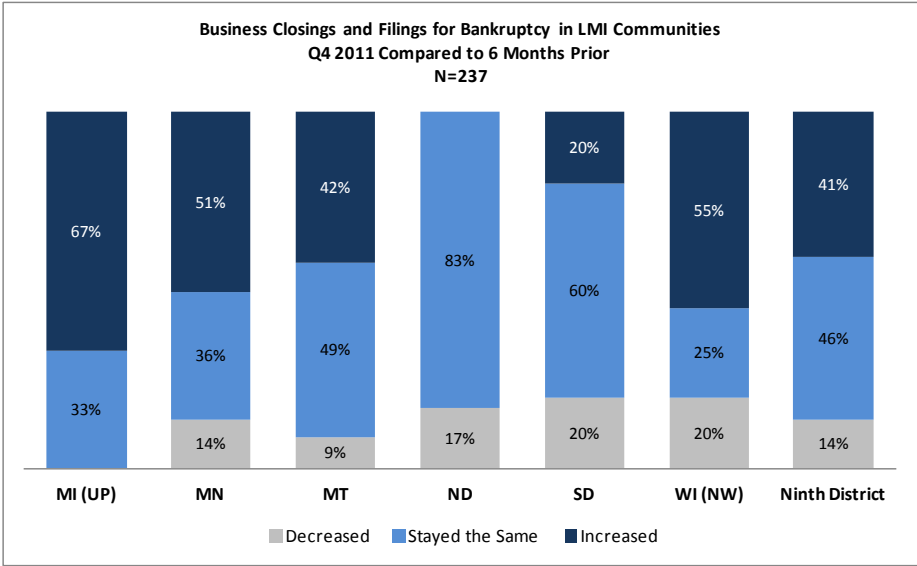


“Fewer personal assets, reduced credit scores, and little or no equity have resulted in reduced access to credit. For some, business expansion plans have been dropped or put on hold.”—Respondent in urban MN

*“Many small businesses have [had] to seek alternative financing programs due to banks’ more stringent lending standards.”
—Respondent in mixed urban-rural MT*

“Because of the recession, it [has been] harder for entrepreneurs to get start-up loans. Banks are more cautious about lending.”—Respondent in rural WI

Indicators of business vitality in LMI communities appear to vary across the Ninth District. Forty-one percent of respondents said that the number of businesses closing or filing for bankruptcy has increased over the past six months, while nearly half (46%) said that conditions remain about the same. Anecdotally, micro-businesses appear to be faring better than small businesses. According to respondents, unfavorable credit conditions, decreased consumer spending, and increased property taxes have been burdensome for many business owners.



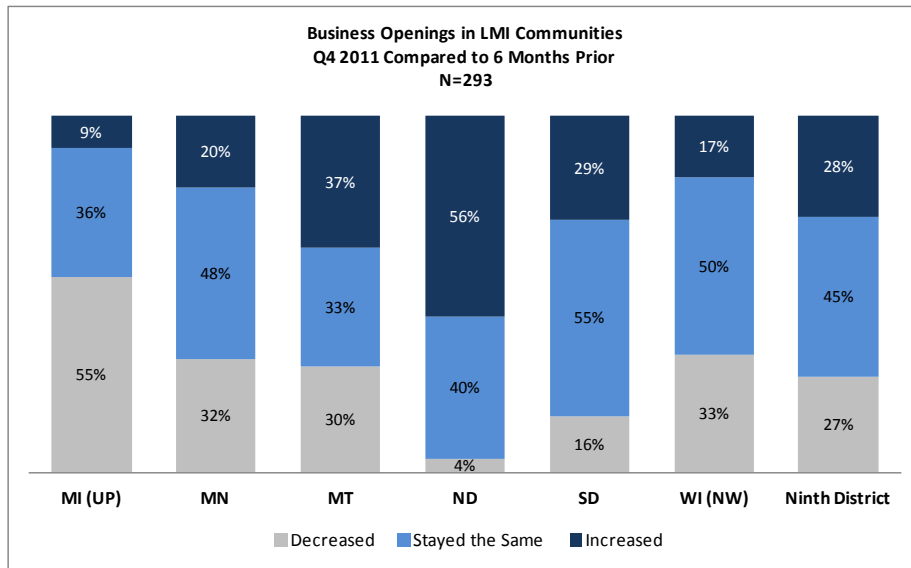
“The few small businesses on the reservation are not faring well. The gas station, laundromat, and restaurant on Main Street have all shut down.”—Respondent in rural MT

“In our area, small businesses are holding their own, but running on leaner budgets, hoping [there are] no major repairs needed for buildings or equipment.”—Respondent in rural MT

“[We are] hearing that micro-businesses are doing better than small businesses. Small businesses are having a more difficult time, especially with increases in property taxes and [fewer] financing options.”—Respondent in urban MN

“Many businesses are closing. Because people are leaving the area, we are also seeing a decline in school enrollment.”—Respondent in rural MI

Survey responses indicate scattered signs of increased business strength across the District. About one-quarter of respondents (28%) reported an increase in the number of business openings in the LMI communities they serve in comparison to six months ago. In particular, agricultural businesses in LMI communities have continued to fare well, as have establishments located in or near the oil boom region. In areas where business openings remain flat, respondents said that the lack of infrastructure, including commercial space and access to high-speed Internet service, has prevented some companies from expanding.



“We have had several new businesses open or businesses expand in the past two years. It is a challenge to find competent, dependable help.”
 —Respondent in rural SD

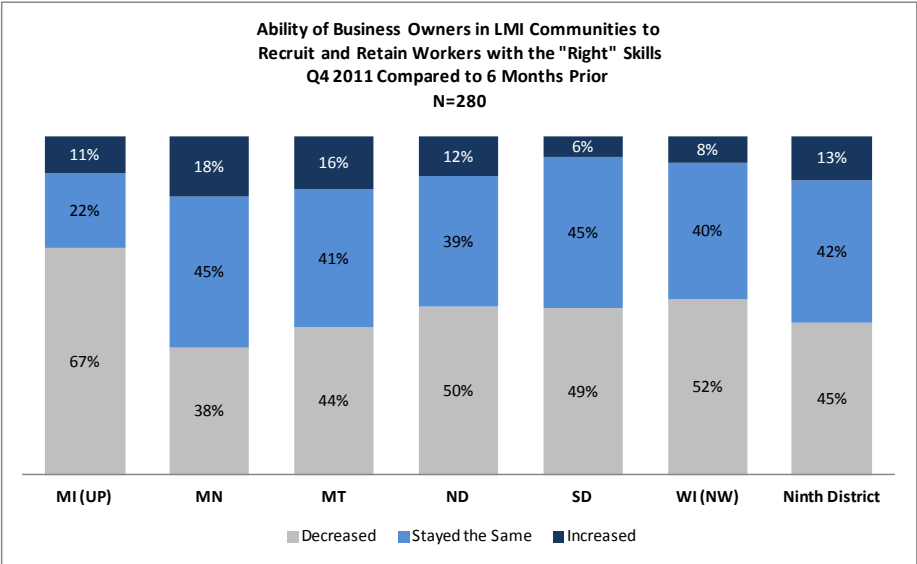
“Our community is experiencing a time of opportunity and [high] activity. Agriculture has had positive returns, and this year, [we] saw two new businesses start up in addition to normal business expansions—a new motel and tourist-oriented restaurant and bar.”—Respondent in rural ND

“Small businesses have limited opportunity on the reservation due to a lack of commercial buildings. Most buildings and all [of the] land is owned by the tribe. Several micro-businesses have been discussed, but commercial space is lacking.”—Respondent in rural MT

“Inquiries regarding available buildings have increased, especially for [large] manufacturing sites. This is actually a problem for [our county] since vacant plants have been steady sellers over the past three years and we have few remaining buildings of that size.”—Respondent in rural WI

Business owners’ inability to meet workforce needs appears to be growing in LMI communities, especially in the manufacturing sector. Districtwide, almost half (45%) of respondents reported a decrease in business owners’ ability to recruit and retain workers with the “right” skills in comparison to six months earlier. According to respondents’ comments, there continues to be an unmet demand for workers with highly specialized manufacturing skills. There has also been an increase in employer demand for job training funds, suggesting that business owners are either unable or unwilling to bear the cost of training. In some rural areas, the shortage of workforce housing and continued population decline has made employee recruitment extremely difficult.

Survey results indicate that Minnesota may be experiencing fewer difficulties with workforce recruitment and retention than other states. In Minnesota, nearly 1 in 5 (18%) respondents reported an increase in business owners’ ability to recruit and retain workers with the “right” skills in the previous six months and less than 40 percent reported a decline.



“More companies are looking to hire, but they can’t find trained workers. The funds for training programs have decreased.”—Respondent in rural MN

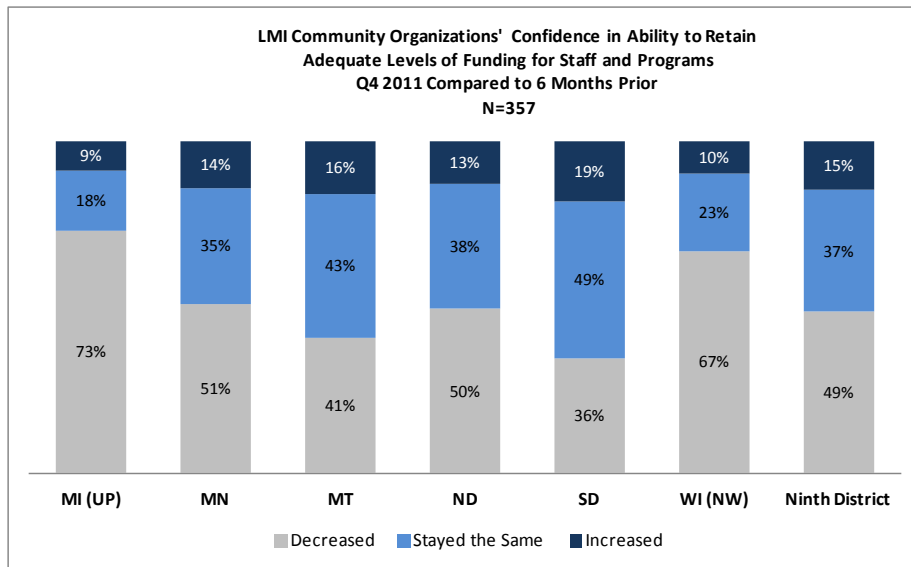
*“We have a workforce shortage with strong economic [growth] in manufacturing and all other sectors.”
—Respondent in rural SD*

Capacity of Community Development and Service Organizations

Funding levels and the ability to meet LMI community service needs

In addition to sharing their perspectives on current economic conditions for the LMI communities they serve, we asked respondents to share their perspectives on their own organization’s financial outlook and ability to meet ongoing community service needs.

Districtwide, about half (49%) of respondents reported decreased confidence in their organization’s ability to retain adequate levels of funding for staff and programs compared to six months earlier. Survey responses indicate widespread concern over government spending cuts. In particular, respondents mentioned the loss of funds provided by the 2009 American Recovery and Reinvestment Act and cuts to federal housing programs. A decline in the amount of funding available for general operating expenses from both government and philanthropic sources was also a concern. According to respondents, some organizations have been able to weather these cuts by diversifying their funding streams, while others have opted to merge with like organizations.



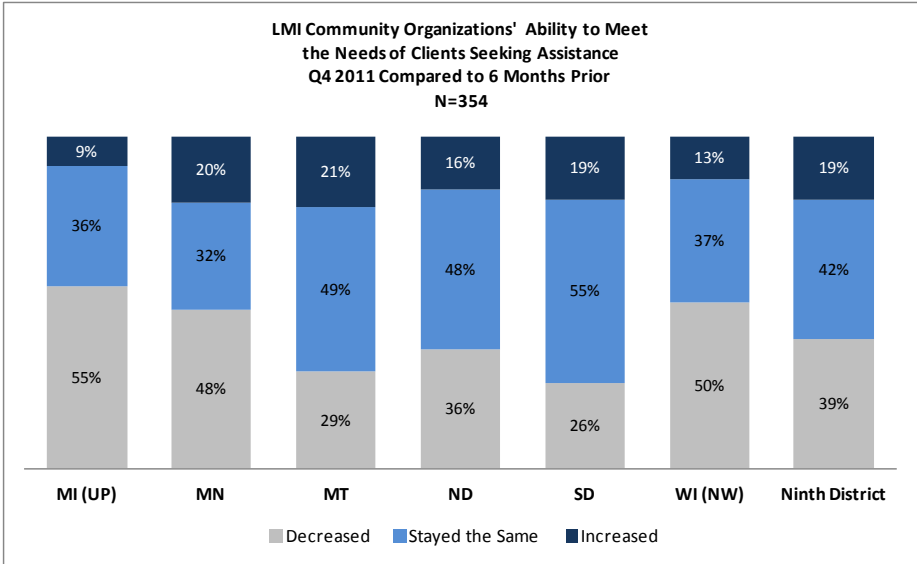
“The environment in which we deliver our services is changing. We have concerns about the erosion of traditional funding sources for nonprofits and governmental entities that serve our communities.”
—Respondent in rural MN

“Community Development Block Grant funding is one of our main sources of funding for basic-needs services. This [federal] funding has been cut, leaving us with less money for services than ever before.”
—Respondent in rural SD

“We are experiencing some new business [growth] in the manufacturing sector and feel that the technical assistance we provide is pivotal to growing our local economy. We are concerned about retaining our capacity to serve our communities and local businesses over time.”—Respondent in rural MT

“Like all nonprofit organizations, we feel some anxiety about our future. We have been able to sustain our funding by aggressively pursuing new funders and developing new strategies to diversify our funding streams.”—Respondent in urban MN

Changes in ability to meet the ongoing service needs of LMI communities appear to vary for community development and service organizations across the District. In South Dakota and Montana, less than one-third of respondents (26% and 29%, respectively) reported a decrease in their ability to meet the needs of clients seeking assistance over the previous six months, compared to half of the respondents in Minnesota and Wisconsin. Among organizations that provide basic-needs services, respondents continued to report increased demand for services by formerly middle-class households. Survey results indicate some signs of improvement in this area. Districtwide, about 1 in 5 LMI community organizations reported an increase in their ability to meet the needs of clients seeking assistance in comparison to six months earlier.



“There continues to be a high demand for social services. Many ethnic-based organizations are shutting their doors because of lack of funds or financial accountability. As a result, we are seeing more demand for our services and we do not have the staff to meet these needs.”

—Respondent in urban MN

“Seven tribal government programs have shut down due to lack of funding in the past six months. The need for community services is great and our outlook is grim.”

—Respondent in rural MT

“Many nonprofits are having a difficult time financially and some have opted to merge with larger organizations. This is especially true for smaller nonprofits. The need to do strategic planning has increased and more is demanded from staff in terms of knowledge and technical skills than was [previously] the case.”

—Respondent in urban MN



About *Ninth District Insight*

The *Ninth District Insight Survey* is designed to capture front-line observations about issues that affect the economic health of LMI communities. The survey responses can serve as leading indicators of change in conditions that are otherwise difficult to measure, or are not measured through other existing data sources. Federal Reserve Bank of Minneapolis senior leadership and Community Development staff use *Ninth District Insight* to help identify regulatory and policy issues that deserve attention and to decide how Community Development program resources should be targeted. We hope the community-based perspective that *Ninth District Insight* provides will also be a valuable resource for decision makers outside the Federal Reserve System.

Participation in *Ninth District Insight* is entirely voluntary and no individually identifiable information is reported. If you would like your organization to be considered for inclusion in the next survey, contact Ela Rausch at ela.rausch@mpls.frb.org. For more information about the project or to download a copy of this report, visit www.minneapolisfed.org/publications_papers.