POTTAWATTAMIE COUNTY HOUSING TRUST FUND, INC. HOUSING ASSISTANCE PLAN (2020)

Introduction

The formation of a housing trust fund in Council Bluffs was initiated in 2008 when the Human Services Advisory Council Housing Committee met with Council Bluffs housing professionals. The group recognized they shared a vision that through collaboration they could more effectively address the housing needs of Council Bluffs residents. The group pursued a strategic planning effort which identified and lead to the official establishment of the Council Bluffs Housing Trust Fund (CBHTF) in 2010.

In November 2010, the newly formed CBHTF received 2011 Housing Trust Fund Grant from the Iowa Finance Authority (IFA) for the first time. The State of Iowa approved the CBHTF to operate as a nonprofit organization in May 2011. In July of 2019, CBHTF service area was expanded to include all of Pottawattamie County. As a result it was renamed the Pottawattamie County Housing Trust Fund (PottCoHTF). The mission of the PottCoHTF is to be an advocate for safe and affordable housing opportunities for Pottawattamie County residents.

A public hearing was held on August 21, 2019 to solicit comments and identify housing gaps and needs in Council Bluffs and Pottawattamie County. This information along with local demographics and existing housing conditions, were used to develop a Housing Assistance Plan (HAP).

Geographic Service Area

The PottCoHTF will confine its efforts and use its resources to serve those needs identified within the boundaries of the corporate limits of the 14 cities and unincorporated areas of Pottawattamie County, Iowa.

Need for Proposed Activities/Gaps in Housing Needs

Pottawattamie County's affordable housing needs were reviewed. The needs and gaps were documented from the U.S. Census Bureau, the U.S. Department of Housing and Urban Development (HUD), and by holding a public hearing to gather citizen input. Conclusions to be made from these analyses highlight the County's housing gaps and the need for the PottCoHTF's proposed activities.

1. Income Levels – Low to moderate income (LMI) persons are those persons with incomes at or below 80% of the median family income (MFI). According to the 2017 American Community Survey (ACS) conducted by the U.S. Census Bureau, the 2017 (MFI) was \$56,291. Council Bluffs' MFI was \$49,750.

According to the 2011-2015 ACS data, Pottawattamie County has a LMI population of 41,940, which is 46.14% of the total population. Council Bluffs has LMI population of 32,105, which is 53.41% of the total population. The ACS 2011 to 2015 data set is the data set used by HUD to determine LMI in communities and other political geographies. This is important in determining the number of households within Council Bluffs having the financial capacity to afford housing. Based on the data presented, households earning less than the 80% of the MFI lack the financial capacity to afford quality housing.

The median monthly housing costs for renter-occupied housing units were also examined. Statewide this figure is \$740 and Council Bluffs is \$797 in 2017, leading to a conclusion that housing costs for Council Bluffs residents are slightly higher than the lowa median. The median monthly housing costs for renter-occupied housing in Pottawattamie County, including Council Bluffs, is \$790. The conclusion reached through the analysis of income levels is that with over half of Pottawattamie County's population

considered LMI, the financial capacity of the residents is limited. This is particularly highlighted by the cost burdens placed on renters who face affordability challenges.

2. Housing Conditions - The PottCoHTF reviewed the general housing conditions in Council Bluffs and Pottawattamie County. In particular the number of substandard occupied housing units, the number of vacant units and the age of the housing stock were analyzed. Substandard housing is defined as 1) having units lacking complete plumbing and 2) housing units with 1.01+ persons per room. In 2017, a total of 699 or 1.9% of the occupied housing units in Pottawattamie County were substandard. See the table below for substandard housing unit details.

Housing Conditions (2017)	Counci	il Bluffs	Balance (Balance of County	Pottawattamie County	
	Count	Percent	Count	Percent	Count	Percent
Total Housing Units	26,875	100.0%	12,971	100.0%	39,846	100.0%
Occupied Housing Units	24,798	92.30%	12,128	93.5%	36,926	92.7%
Vacant Housing Units	2,077	7.70%	843	6.5%	2,920	7.3%
Substandard Housing Units	581	2.30%	118	1.0%	699	1.9%
Lacked Complete Plumbing Facilities	119	0.50%	56	0.5%	175	0.5%
1.01+ Persons per Room	462	1.90%	62	0.5%	524	1.4%

Source: US Census Bureau, 2013-2017 American Community Survey (ACS)

In 2010, 2,555 vacant units were identified compared to 2,920 vacant units in 2017 in Pottawattamie County. The increase of 365 units may still reflect a broader trend of inadequate maintenance and housing quality that leads to property condemnations due to public health and safety issues. It may also reflect the increase in foreclosures and decline in home sales in the area. The number of occupied (owner & renter) housing units and vacant units for Council Bluffs, Pottawattamie County, and the balance of Pottawattamie County in 2010 and estimated in 2017 are outlined in the following tables. Council Bluffs has significantly higher renter occupied housing units than the balance of Pottawattamie County.

Housing Occupancy (2010 and	Council Bluffs		Balance of County		Pottawattamie County	
2017)	Count	Percent	Count	Percent	Count	Percent
Occupied Housing Units (2010)	24,793	93.2%	11,982	94.1%	36,775	93.5%
Owner-Occupied	15,162	61.2%	9,967	83.2%	25,129	68.3%
Renter-Occupied	9,631	38.8%	2,015	16.8%	11,646	31.7%
Vacant Housing Units	1,801	7.8%	754	5.9%	2,555	6.5%
Occupied Housing Units (2017)	24,798	92.3%	12,128	93.5%	36,926	92.7%
Owner-Occupied	15,191	61.3%	10,010	82.5	25,201	68.2%
Renter-Occupied	9,623	38.7%	2,102	17.5%	11,725	31.8%
Vacant Housing Units	2,077	7.7%	843	6.5%	2,920	7.3%

Source: U.S. Census Bureau, 2013-2017 American Community Survey (ACS) and 2010 Census

According to 2017 ACS data, 12,530 of the 26,875 housing units (46.6%) in Council Bluffs in 2017 were built prior to 1959. This data is important because the age of housing stock provides a rough estimate of the quality of housing stock. Older homes tend to have more problems and often contain environmental

hazards such as asbestos and lead-based paint. Older homes are more expensive to maintain and may constitute a health hazard due to compounded years of poor maintenance. Foundation problems, wood rot, poor electrical connections, and other problems are found much more frequently in older houses than in newer homes. Moreover, substandard older housing is often occupied by those residents least able to afford the regular maintenance required of an older home. Particularly this can be a challenge for persons who live on a fixed income but own their home. The age of the housing stock in Pottawattamie County is similar to that of Council Bluffs. The age of housing units in Council Bluffs, Pottawattamie County, and the balance of Pottawattamie County is presented in the following table.

Age of Housing Units (2017)	Council Bluffs		Balance of County		Pottawattamie County	
	Count	Percent	Count	Percent	Count	Percent
Total Housing Units	26,875	100.0%	12,971	100.0%	39,846	100.0%
Structures Built 2000 to Present (< 20 years old)	3,818	14.2%	1,877	14.5%	5,695	14.3%
Structures Built 1960 to 1999 (20 to 60 years old)	10,527	39.20%	6,087	46.9%	16,614	41.70%
Structures Built 1959 or Earlier (> 60 years old)	12,530	46.60%	5,007	38.6%	17,537	44.00%

Source: U.S. Census Bureau, 2013-2017 American Community Survey (ACS)

The median housing value of owner-occupied housing units for Council Bluffs is \$115,800, which is 84.4% of the lowa statewide average of \$137,200. Pottawattamie County also has a higher median housing value of \$133,500.

3. Public Hearing – On August 21, 2019, the PottCoHTF held a public hearing to gather citizen input on housing needs and gaps in the community. Three housing needs were identified: 1) Rental Housing; 2) Homeownership Assistance; and 3) Education of Potential Renters and Owners.

Priority Areas

The PottCoHTF has expanded on the identified needs from the public hearing and has formulated the following types of projects for funding. In random order they are as follows:

- 1. Rental Housing, including rehabilitation, new construction, emergency housing, transitional housing and permanent supportive housing;
- 2. Homeownership Assistance, including direct assistance, rehabilitation and new construction; and
- 3. Education of Potential Renters and Owners, including general maintenance information.

Collaborating Resources

Each of the priority areas requires collaboration with several resources to produce a successful outcome.

1. Rental Housing, including rehabilitation, new construction, emergency housing, transitional housing, and permanent supportive housing:

Potential Resources
Iowa West Foundation and other philanthropic entities
City of Council Bluffs and Pottawattamie County

State Housing Trust Fund

Iowa Finance Authority

Federal Home Loan Bank

Municipal Housing Agency

Southern Iowa Regional Housing Authority

Local Non-Profit and For-Profit Housing Developers

Landlords

Contractors

Local Human and Social Service Agencies

US Department of Housing and Urban Development

Local Real Estate Agencies

2. Homeownership Assistance, including direct assistance, rehabilitation, demolition for unsafe buildings, and new construction:

Potential Resources

Iowa West Foundation and other philanthropic entities

City of Council Bluffs and Pottawattamie County

State Housing Trust Fund

Iowa Finance Authority

Federal Home Loan Bank

Municipal Housing Agency

Southern Iowa Regional Housing Authority

Local Non-Profit and For-Profit Housing Developers

Landlords

Contractors

Local Human and Social Service Agencies

US Department of Housing and Urban Development

Local Real Estate Agencies

3. Education of potential owners and renters (including general maintenance information):

Potential Resources

Landlord Association and Real Estate Agents/Agencies

Municipal Housing Agency

Local Non-Profit Housing Developers

Local Non-Profit Legal Advisors

Local Emergency Shelters and Transitional Housing & Permanent Supportive

Housing Facilities

City of Council Bluffs and Pottawattamie County

Iowa Finance Authority

Iowa Western Community College

State Housing Trust Fund

Iowa West Foundation and other philanthropic entities

Local Human and Social Service Agencies

Economic, Social and Health Benefits

Improved housing options provide many benefits. Some are identified below:

- 1. Affordable housing allows households to be financially stable and at less of a risk of becoming homeless.
- 2. Entice younger families to move into the area.
- 3. Help household members connect to their community. They are more apt to volunteer services and donate resources for the betterment of the community.
- 4. Attract young families with children, which add to the school districts' vitality.
- 5. Improve neighborhood appearance. New residents are more likely to move into clean neighborhoods where the housing is well maintained.
- 6. Improves tax base by increasing the valuation.
- 7. Larger population to share community expenses.
- 8. Strong housing base gives business and industry a place to house workers.
- 9. Improvements give homeowners a sense of pride. Homeowners are more likely to clean up and repair their homes if neighbors are improving their homes.
- 10. Increase the amount of available and accessible affordable, decent, safe and sanitary housing stock. Unstable housing situations interfere with the education of children and the physical and emotional health of the family.
- 11. Housing projects will generate jobs for local contractors and businesses.

Program Guidelines

- 1. The following narrative outlines the types of projects
 - a. Program administration.
 - b. Rehab/repair/renovation of rentals; including emergency units, transitional housing units and permanent supportive housing units. With priority given to rental properties for very low income persons (30% of the MFI).
 - c. Direct homeownership assistance, through rehabilitation/repair/renovation and down payment assistance.
 - d. Expansion of rental or owner-occupied housing. With priority given to rental properties for very low income persons. Rental subsidies will be considered for homeless or very low income persons.
 - e. Educate potential owners and renters and provide general maintenance including landlord/tenant accountability information for participants of the projects.
 - f. Educate current owners or potential owners how to ensure they are able to maintain their financial equity in the house and how to prevent foreclosure.
 - g. Demolish foreclosure, unsafe, and dilapidated buildings.

2. Types of investments

The program will use grants, forgivable loans and low-interest loans. At a minimum, funding sources supported projects include lowa Finance Authority; City of Council Bluffs; Pottawattamie County; Iowa West Foundation; non-profit housing developers; local human and social service agencies; real estate agencies; and financial institutions. Additional sources may be identified as the program progresses.

3. Required terms and conditions

a. Rental Housing Repair and Expanded Rental Housing - Provide up to \$5,000 in forgivable loans or grants per unit for repairs. Provide rent assistance for at-risk/homeless individuals and families for a maximum of one (1) year in rentals that are in compliance with local health and safety codes

which must be validated by the agency. Additional funds may be available when deemed necessary to eliminate immediate health and safety risks. Tenant income verification to meet under 80% median household income is required, with under 30% MFI as the priority. Property owners must provide \$1.00 of private funds for each \$1.00 of program funds. All property taxes and assessments must be kept current on the property during the loan period. Insurance is required and must name PottCoHTF as mortgagee. A title certificate from a license abstractor must be provided showing fee simple title in owner, subject only to acceptable liens. The unit must be rented to households with incomes at or below 80% of the MFI for the duration of the loan. If at any time during the loan period the unit is no longer rented to a household with an income at or below 80% of the MFI, then the pro-rated remaining amount due on the loan is immediately due and payable. The unit must, at completion and throughout the loan period be in compliance with all applicable local health and safety codes. Property will be satisfactorily inspected upon completion, if required by the applicable local government jurisdiction. If a property violates local code, the owner will have 60 days to cure the violation. If the violation is not cured within the given time period, PottCoHTF may declare the loan immediately due and payable. All loans will be secured by a mortgage document placed on the real property in favor of PottCo. If title is transferred during the term of the loan, PottCoHTF may declare the loan immediately due and payable. Any default of the terms of the loan without cure may cause the remaining loan to become immediately due and payable and bear interest at the highest legal rate. The renter must acknowledge receipt of an acceptable renter's guide. individual landlord/owners of 1-4 unit properties, assistance is capped at \$10,000 per property and tenant retention is the priority. Repairs or rehab that will benefit existing tenants will remain a high priority and repairs that will keep the tenant in place while complying with city inspection program will have priority over vacant properties. Loans will be forgiven as follows: At the end of 3 years, 50% shall be forgiven. At the end of 4 years, an additional 25% with full forgiveness at the end of 5 years. No given owner shall have more than \$50,000 in outstanding PottCoHTF loans or grants unless waived by the Board of Directors. Detailed guidelines may be located in the Landlord Rehab and Repair Policy and Procedures most recently adopted by PottCoHTF Board of Directors. For larger properties (greater than 4 units) loans will be a forgivable loan for 5 years for grant amounts under \$50,000.00, or 10 years for amounts \$50,000.00 and over, if board approves a grant over \$50,000.

- b. Homeownership Assistance Provide up to \$10,000 per home, funds secured by a 10-year forgivable loan. Repayment of the loan on a pro rata basis will be required if any of the following occur within the specified term of assistance: title to ownership and/or any other interest in the property is sold and/or transferred to another party; a party, other than the purchaser and their immediate family, rents, leases, and/or occupies the property; occupancy of the property is abandoned for a period of 60 consecutive days. The potential homeowner must have an income at or below 80% of the MFI for the area. Buyer shall satisfactorily complete a pre-purchase education program offered by an agency approved by PottCoHTF prior to receiving funds. Loan will be secured by a mortgage document placed on the real Property in favor of PottCoHTF. Insurance naming PottCoHTF as mortgagee must be in place during the loan term.
- c. Owner-Occupied Housing Repair Provide up to \$10,000 for repairs to owner-occupied homes. Repairs related to improving health, safety, energy efficiency, and lead hazard reduction measures are eligible. Preference is given to structural repairs. The amount will be in the form of a 5-year foregivable loan on the property. Pro rata repayment of the loan will be required if any of the following occur within the specified term of assistance: title to ownership and/or any other interest in the property is sold and/or transferred to another party; a party, other than the purchaser and their immediate family, rents, leases, and/or occupies the property; occupancy of the property is

abandoned for a period of 60 consecutive days. Applicant must have title at time of application. The owner must have an income at or below 80% of the MFI. The home must, at completion, be in compliance with all applicable local health and safety codes and work must be completed by a licensed general contractor. The property will be inspected. No properties under land contract will be considered. All loans will be secured by a mortgage document placed on the real property in favor of PottCoHTF. Any default of the terms of the loan without cure may cause the remaining pro rata loan balance to become immediately due and payable and bear interest at the highest legal rate. Property insurance is required naming PottCoHTF as mortgagee is required during the term. Homeowner will be required to take a maintenance class from an agency specified by PottCoHTF. Specific procedures, documentation, and eligibility requirements are outlined in the Direct Grant Repair Program Guidelines, most recently adopted by the PottCoHTF Board of Directors.

- d. Owner and Renter Education Provide funds to an agency approved by PottCoHTF to provide homeowner or landlord tenant accountability education to persons having an income at or below 80% of the MFI.
- e. Unsafe Buildings Provide funds to an agency approved by PottCoHTF to reimburse homeowner for the cost of demolition and removing an accessory building on their property that was tagged as unsafe by the applicable local government jurisdiction.
- 4. Program Guideline Modifications Provided it furthers the mission of the PottCoHTF to develop and preserve affordable housing in the community, the PottCoHTF reserves the right to waive or modify the requirements contained in these program guidelines for grant applicants on a case by case basis or upon a request for guideline clarification made by a grant applicant. Any final program guideline waivers or modifications shall be approved by a vote of the PottCoHTF Board.
- 5. Dollar limits The dollar limits are identified above with terms and conditions.

6. Income limits/targets

30% Requirement	Thirty (30%) percent of PottCoHTF funds will be applied to households or units rented to families at or below 30% of MFI
Homeownership and Educational Assistance	Buyer must have an income at or below 80% of MFI
Educational Assistance	
Housing Repair or	Rental units and owner-occupied units must be occupied by a household at
Expanded Housing	or below 80% of MFI

7. Eligibility Requirements

Rental Housing Repair - Priority is given to property owners that provide a 1 to 1 match of program funds. All property taxes and insurance must be current, continued compliance with local codes, and information provided to PottCoHTF annually by the grantee.

Homeownership Assistance - The buyer must have an accepted purchase agreement and financial institution willing to provide the mortgage. Buyer shall satisfactorily complete pre-purchase education program offered by a PottCoHTF approved agency prior to receiving funds.

Owner-Occupied Housing Repair - Applicant must have title at time of application. The home must, at housing repair completion, be in compliance with application local health and safety codes. The homeowner must complete a maintenance course. No properties under land contract will be allowed.

- 8. Underwriting requirements PottCoHTF will work with local financial institutions to use the best underwriting criteria available. This can include low down-payment, lower interest, reduced closing fees, lower value to loan ratio, etc. This will enable PottCoHTF to use its funds efficiently and effectively to assist as many households as possible.
- 9. Leverage requirements The program will receive IFA resources totaling \$193,500 for 2020, and the POTTCOHTF will provide a minimum of 25% match for this program which equals \$48,375.

Fundraising Activities/Efforts to Raise Additional Funds

To date, the PottCoHTF has received a commitments from Pottawattamie County, Iowa West Foundation and other private contributions. We have also received in-kind commitments from Telpner Peterson Law and NP Dodge Real Estate. The PottCoHTF Board continues to research other grant opportunities as sources for funding and has been successful in diversifying its funding streams. Fundraising will continue through networking and pooling of available resources. Fundraising will also be done through the solicitation of private and federal funding, donations of property or materials, volunteer labor and housing units. Monetary or in-kind contributions will be solicited from local businesses, developers and real estate agents. The Board will continue to develop fundraising strategies as needed.

Housing for the Extremely Low-income

The extremely low-income will be assisted through the rehab/repair/renovation or expansion of rental housing projects. Many of the elderly population are at or below 50% of MFI due to their fixed income levels. The elderly population age 62 and over in Pottawattamie County increased from 14,097 in 2000 to 18,509 in 2017. The population of elderly age 75 and over grew from 5,497 in 2000 to 6,661 in 2017. This represents a 21.2% increase over the 17-year period; showing that the elderly population will remain living within the county and staying in their current homes. Funds from the PottCoHTF will be made available to the elderly who are very low and low-income, living in homes that need repairs. These repairs will stabilize the home, allow the elderly to age in place and assist in stabilizing the housing market in Council Bluffs and the balance of Pottawattamie County.

Continuum of Housing Needs

The PottCoHTF will impact the continuum of housing needs through the implementation of its programs.

- 1. Homelessness Homelessness needs are addressed through the Metro Area Continuum of Care (MACCH) for the Homeless and over 100 of its partner agencies. MACCH has adopted a ten year plan to end homelessness with specific goals of the prevention of homelessness, easier access to services, increased availability of housing, strengthened public and political support, the elimination of cultural bias and prejudice, specific options for persons experiencing chronic homelessness and availability of comprehensive data to support and document progress.
- 2. Transitional Housing This need is addressed through the trust fund's rental housing repair program which will provide matching funds for rental unit repairs, with a priority given to those units rented to households at or below 30% of the MFI. Rental subsidy and education also will be considered for atrisk/homeless persons.
- 3. Rental This need is addressed through the trust fund's rental housing repair program which will provide matching funds for rental unit repairs, with a priority given to those units rented to households at or below 30% of the MFI. Rental subsidy also will be considered for at-risk/homeless persons.

4. Homeownership - This need is addressed through the trust fund's homeownership assistance program which will provide up to \$10,000 per home in down payment assistance to persons at or below 80% of MFI.

Stagnant/Declining Housing Markets

There are several stagnant or declining housing markets in Pottawattamie County. Council Bluffs has designated many of these areas using state and federal definitions as areas in need of additional resources. The PottCoHTF will encourage the location and funding of projects in these areas which may offer additional funding options to the developer/builder.

- 1. Neighborhood Revitalization Strategy Area The City of Council Bluffs has a HUD designated Neighborhood Revitalization Strategy Area (NRSA). It is a contiguous area of about four square miles located in the central portion of Council Bluffs and 56% of it is classified as residential. It contains the city's central business district, the Broadway commercial corridor, railroad related industrial uses and a variety of single family residential neighborhoods. It also contains some of the City's most physically deteriorated areas, including the central railroad corridor, industrial precincts between 9th and 14th Avenues from 16th Street to the South Expressway and the Mynster Street area northwest of downtown. The NRSA Plan makes several general conclusions about housing characteristics within the area:
 - a. The area has a relatively high incidence of undervalued property. In general, both values of owner-occupied and rents for apartments lag behind those of other parts of the City.
 - b. Despite these relatively lagging values, the area exhibits a substantial shortage of housing for low income people. In addition to this shortage, a relative lack of higher value housing creates competition for moderately priced housing stock which further puts LMI households at a disadvantage.
 - c. Most of the housing in Council Bluffs that needs rehabilitation is located in the NRSA.
- 2. The lack of affordable housing options and production of affordable housing units in the balance of Pottawattamie County. Although the number of LMI persons in the balance of Pottawattamie County is lower as a percentage, limited options exist to address affordable housing issues.

Underserved Areas/Populations

Based on U.S. Census/ACS data from 2011 to 2015, and according to HUD's methodology, the City of Council Bluffs is a low-to-moderate-income community. An estimated 32,105 persons are LMI or 53.41% the total population. Below is a table with all of the cities in Pottawattamie County, showing their population and the percent of this population that is LMI. Hancock is the only other city that has an LMI value greater than 51%. Median monthly housing costs in Council Bluffs are higher compared to the State of Iowa, which is burdensome for the LMI population. Rising housing costs are not correlating with increasing housing values; the median housing value of Council Bluffs is less than both Pottawattamie County and Iowa. Stagnant or declining values are largely attributed to the aging housing stock of the community, where 46.6% of its housing stock was built prior to 1959. For those on limited or fixed incomes, general maintenance and upkeep costs associated with older homes is yet another financial hindrance to LMI persons. Month-to-month housing costs and general maintenance expenses are likely the primary contributors to Council Bluffs' rising vacancy rate, which now exceeds 2,000 units. An additional factor is poverty, with the number of persons in poverty in Council Bluffs being 13.9% compared to 12.0% for the state of Iowa. Depicted on the following

table, the communities with 40% or more LMI persons include Avoca, Carson, Carter Lake, Council Bluffs, Hancock, Neola, Shelby, and Walnut. Remaining communities range from 25.00% to 39.22% LMI.

Low to Moderate Income Populations for Cities in Pottawattamie County					
City	Population	LMI Population	LMI Percent		
Avoca	1,380	660	47.83%		
Carson	845	405	47.93%		
Carter Lake	3,770	1,870	49.60%		
Council Bluffs	60,110	32,105	53.41%		
Crescent	540	135	25.00%		
Hancock	170	110	64.71%		
Macedonia	255	100	39.22%		
McClelland	130	35	26.92%		
Minden	630	225	35.71%		
Neola	910	375	41.21%		
Oakland	1,530	440	28.76%		
Shelby*	560	245	43.75%		
Treynor	1,015	335	33.00%		
Underwood	885	245	27.68%		
Walnut	690	325	47.10%		

^{*}Shelby is partially in Pottawattamie County Source: HUD 2011-2015 ACS LMI Data

Bibliography

2000 American Community Survey (ACS) Data vs Census Bureau 2010 American Community Survey (ACS) Data vs Census Bureau 2013-2017 American Community Survey (ACS) Data vs Census Bureau HUD 2011-2015 ACS LMI Data