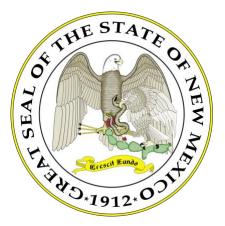


# NEW MEXICO HOMEOWNER ASSISTANCE FUND PLAN

Prepared for the U.S. Department of Treasury by the New Mexico Mortgage Finance Authority and the State of New Mexico

July 2021



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# Homeowner Needs and Engagement

Along with rest of the world, New Mexicans experienced severe hardship since the COVID-19 health crisis. Today New Mexico has the second highest unemployment rate the nation.<sup>1</sup> The financial challenges facing New Mexicans may only worsen as foreclosure and eviction moratoriums expire on July 31, 2021 and extra federal unemployment benefits end on September 6, 2021.

MFA prepared this plan to propose programs for the U.S. Department of Treasury's Homeowner Assistance Fund (HAF) that was passed as part of American Rescue Plan Act of 2021. These programs aim to mitigate financial hardships associated with the COVID-19 health crisis, including the prevention of homeowner mortgage delinquencies, defaults, foreclosures, loss of utilities or home energy services, and displacements of homeowners.

#### Data-Driven Assessments of Homeowners Needs

The following sections provide analysis of homeowners in need for HAF programing in New Mexico.

#### Income Eligible and Socially Disadvantaged Households

More than two-thirds of New Mexico's homeowner population are estimated to meet the HAF income eligibility requirements. There are an estimated 371,648 (70.9%)<sup>2</sup> homeowner households that are at or below 150% Area Median Income (AMI) and 221,920 (42.4%)<sup>3</sup> homeowner households that are at or below 100% AMI.<sup>4</sup> (See Table 1 for homeowner households at or below 150% AMI by county and see Table 2 for homeowner households at or below 100% AMI by county). Further, among New Mexico's homeowner households 313,704 (59.4%) have a head of household who identifies as a person of color, which meets Treasury's definition of socially disadvantaged.<sup>5</sup> (See Table 3 for race and ethnicity of homeowner households by county).

#### Financial Hardship

Before the coronavirus pandemic already 103,842 (33.7%) homeowner households with a mortgage and an annual household income below \$75,000 were housing cost burdened.<sup>6</sup> (See Table 4 for housing cost burden for homeowner households with a mortgage and annual households income less \$75,000 by county). While data on housing cost burden since the pandemic has yet to be released, responses to the Household Pulse Survey (HPS) indicate widespread financial hardship among New Mexico homeowners. On average during Weeks 1 through 28 of the HPS (Week 1 of the HPS covers April 23-May 5, 2020 and Week 28 covered April 14- April 26, 2021), 44.6% of New Mexican homeowner respondents reported experiencing loss of employment income since the on-set of the pandemic. This rate is higher among low- and moderate-income groups: 54.8% for homeowner households with annual income between \$25,000 and \$34,999 and 45.4% for homeowner households with annual income between \$35,000 and \$49,999. Similarly, some socially disadvantaged groups reported higher rates for this same financial hardship indicator: 49.5% for

<sup>&</sup>lt;sup>1</sup> U.S. Bureau of Labor Statistics. <u>Unemployment Rates for State</u>. May 2021.

<sup>&</sup>lt;sup>2</sup> MFA calculation based on ACS 2015-2019 5-Year Estimates

<sup>&</sup>lt;sup>3</sup> HUD Comprehensive Housing Affordability Strategy 2013-2017 data

<sup>&</sup>lt;sup>4</sup> MFA calculations based on ACS 2015-2019 5-Year Estimates

<sup>&</sup>lt;sup>5</sup> Treasury uses the Small Business Administration's <u>definition of socially disadvantaged individuals</u> as described in 13 CFR 124.103(c))

<sup>&</sup>lt;sup>6</sup> ACS 2015-2019 5-Year Estimates

Hispanic or Latino homeowner households, 45.9% of Black homeowner households, and 51.6% of multiracial/other race homeowner households. (See Table 5 for financial hardship in New Mexico).

The HPS and other survey projects demonstrate ubiquitous financial hardship associated with the coronavirus pandemic and a particularly severe impact on low- and moderate-income and socially disadvantaged homeowners.<sup>7</sup> Insufficient intervention to mitigate a wave of unnecessary foreclosure and loss of wealth could worsen existing housing inequities as households of color have been more likely to report being behind on housing payments at double the rate of White households.<sup>8</sup>

#### Homeowner Cost Assistance

Low confidence in homeowners' ability to make housing payments coupled with high rates of 30+ day delinquencies justify the need for a homeowner cost assistance program. On average during Weeks 1 through 28 of the HPS, 13.7% of New Mexican homeowner respondents reported that last month's housing payment was not made and 19.8% reported no or slight confidence in ability to make next month's house payment or plans to defer the payment. These rates are higher among low- and moderate-income groups: 26.7% and 39.1% respectively for homeowner households with annual income less than \$25,000, 24.1% and 29.0% for homeowner households with annual income \$25,000 to \$34,999 and 14.5% and 23.5% for homeowner households with annual income \$35,000 to \$49,999. All socially disadvantaged groups reported higher rates of not making last month's housing payment and were more likely to expect struggling with the next month's payment. (See Table 5 for financial hardship in New Mexico.)

Data from the Federal Reserve Bank Mortgage Dashboard shows that among all active loans 3.7% of mortgages statewide were in forbearance and 1.6% were delinquent. Forbearance rates exceeded the statewide rate in rural areas (4.2%), among low-income borrowers (3.9%), and among high minority borrowers (4.0%). Similarly forbearance rates exceeded the statewide rate among Federal Housing Administration Loans (8.7%), United States Department of Agriculture loans (7.1%), and Veteran's Affairs loans (4.2%) Delinquencies exceed the statewide rate in rural areas (2.1%), among low income borrowers (1.8%), and among high minority borrowers (1.8%). (See Table 6 for forborne and delinquent single-family loans in New Mexico.)

As COVID-19 forbearance options begin to constrict or expire on July 31, 2021, there is concern that many borrowers will not be able to access other loss mitigation options. Consequently, foreclosures are expected to increase.<sup>101112</sup> The proposed New Mexico Homeowner Assistance Fund (NMHAF) program offers a response to the anticipated wave of foreclosures that will keep New Mexico residents housed and protect equity earned by low- and moderate-income and socially disadvantaged households.

In listening sessions, several nonprofits that serve homeowners expressed a continued need for mortgage assistance. While one participant stated that the need for mortgage payments appeared to have declined recently, others cautioned that delinquencies and foreclosure filings will likely rise as

<sup>&</sup>lt;sup>7</sup> Other survey projects include Consumer Finance Institute's Survey of Consumers, Mortgage Bankers Association's Delinquency and Forbearance Survey, Urban Institute's Well-Being and Basic Needs Survey.

<sup>&</sup>lt;sup>8</sup> Consumer Financial Protection Bureau. <u>Housing Insecurity and the COVID-19 Pandemic.</u> March 2021.

<sup>&</sup>lt;sup>9</sup> Urban Institute. <u>New Data Suggest COVID-19 is Widening Housing Disparities by Race and Income.</u> May 2020.

<sup>&</sup>lt;sup>10</sup> The Urban Institute. <u>Three Ways to Help 32 Million Struggling Homeowners.</u> December 2020.

<sup>&</sup>lt;sup>11</sup> Housing Wire. <u>Mortgage Delinquencies are Declining but a Rise is Coming</u>. February 2021.

<sup>&</sup>lt;sup>12</sup> Mortgage Professionals America. <u>What's the Impact of the End of Forbearance?</u> June 2021.

borrowers' forbearance agreements expire and foreclosure moratoria are lifted. A representative of the state's unemployment agency also suggested that the reinstatement of work search requirements for unemployment benefits, as well as the eventual expiration of enhanced federal unemployment benefits, could contribute to an increase in the need for housing assistance. Several participants stated that homeowners who do not qualify for most government assistance programs, such as those with incomes above 80% of the area median income or other such income limits are also in need of assistance.

One nonprofit serving homeowners emphasized that real estate contract purchasers are perhaps in greatest need of assistance due to the absence of a judicial process to prevent homeowner displacement through eviction. This participant suggested that in addition to the need for monthly payment assistance, there is a need for a loan product that could be used to refinance real estate contracts.

Participants stated that property tax assistance would fill a significant need that has not been filled by other programs, and that property taxes and homeowner's insurance payments may be especially needed in cases in which escrowed amounts are insufficient when property values rise. Another participant raised the concern that seniors with reverse mortgages may be in danger of foreclosure due to delinquent property tax and homeowners' insurance payments.

#### Foreclosure Prevention and Defense Fund

Data shows that there are borrowers so far delinquent that they face imminent risk of foreclosure. As of January 2021, 8,310 (3.9%) single family loans not on forbearance were 90+ days past due.<sup>13</sup> (See Table 7 for non-forborne 90+ day delinquent single-family loans by county.) Among New Mexicans homeowners who responded to Week 28 of the HSP (April 14- April 26, 202) 19.8% reported that they were very likely or somewhat likely to have to leave their home in the next two months due to foreclosure. These rates are higher among low- and moderate-income groups: 84.3% for homeowner households with annual income less than \$25,000 and 21.2% for homeowner households is 46.3%. (See Table 8 for likelihood of leaving home due to foreclosure in New Mexico.) While these responses do not reflect the actual risk of foreclosure, they highlight the concern among low- and moderate-income households in particular of displacement. Foreclosure prevention and defense programs will offer households support to enter last-chance lost mitigation options or ensure a graceful exit from homeownership that minimizes disruption to the household.

In listening sessions with housing counselors, foreclosure defense legal service providers and foreclosure settlement program administrators, participants predicted a forthcoming wave of foreclosure filings following the expiration of the federal foreclosure moratorium on July 31, 2021, followed by a second wave resulting from the expiration of forbearance agreements. One housing counseling agency estimated that there could be as many as 6,000 to 8,000 homeowners facing either a restart of a judicial foreclosure or a new foreclosure filing due to uncured delinquency immediately after the moratoria are lifted. The estimate is based on information from district courts and an informal poll of default litigation attorneys.

Mortgage servicers, legal service providers, and foreclosure settlement program administrators all discussed the need for housing counselors to assist homeowners in navigating and applying for loss

<sup>&</sup>lt;sup>13</sup> CoreLogic Market Trends

mitigation options as such options vary widely by type of loan and requirements for each option are complex. Servicers mentioned the need for housing counselors to triage borrowers, educate them about what various loss mitigations options entail, assist in application completion, and provide postmodification follow-up. Participants stated that after the 2008 housing crisis, funding for housing counselors declined, and many areas do not have the housing counseling infrastructure that is needed. One housing counseling agency mentioned that while legal services receive funding from the state, there is no state funding source for housing counseling.

One housing counseling agency cautioned that there are some borrowers who may not have the ability to resume payments due to a permanent reduction of income and are in need of housing counselors to assist them in pursuing housing options that are affordable to them. Other participants stated that cash assistance should be a key component of a HAF program, as there are cases in which payment of arrears is needed, such as for borrowers who have private loans that do not have loss mitigation options, borrowers who do not qualify for loss mitigation options and borrowers who are able to resume monthly payments but are unable to pay their total arrears. Some participants suggested structuring cash assistance as a soft second mortgage in order to extend resources.

#### Utility Assistance

The best indicator of the need for utility assistance in New Mexico is data from a survey of utility providers administered by the State of New Mexico's Public Regulation Commission (PRC). Conducted in April 2021, 33 utility providers responded to the questionnaire that asked about residential accounts in arrears. Respondents reported a total of 21,251 accounts in arrears and a total of \$32,544,381 in delinquencies. Since utility companies do not collect data on housing tenure, these figures include both renter and homeowner accounts. Dedicating a portion of the HAF funding, along with New Mexico's Low Income Home Energy Allocation Program (LIHEAP), will help households cure past due utility payments and avoid disconnection. (See Table 9 for PRC survey responses.)

In a listening session with utility providers, one provider stated that application requirements for assistance programs such as the Low Income Home Energy Assistance Program (LIHEAP) and the Emergency Rental Assistance Program (ERAP) may be too complex, thereby hindering people from receiving assistance. Others suggested that utility providers could play a larger role in assistance programs, such as by identifying customers in need, providing information on those customers' account balances or applying on customers' behalf. One large provider stated that existing assistance programs, whether internal or external, do not meet all of the need, as these programs have caps below what many customers owe and/or income limits that render many past-due customers ineligible. This provider also stated that getting customers to actually apply for assistance had been very difficult, despite the fact that the provider had employed multiple methods of information dissemination, including bill inserts, social media, automated calls and public service announcements on television and radio stations. One electric cooperative stated that their staff had hand-delivered letters to customers with information on assistance programs, which did result in an uptick in customer calls.

Providers offering payment plans reported very little response from customers. One provider that offers both electric and internet service noted that customers resumed internet payments once it lifted its moratorium on internet disconnections, but those same customers did not resume electricity payments, likely because the moratorium on electricity disconnections was still in place. Other providers have found that very few customers have applied for payment plans available to them, and this may be due to the moratoria in place. They expect a flood of inquiries once the moratoria are lifted.

#### **Emergency Repair**

Housing condition issues are ubiquitous in New Mexico and in some cases these issues are so severe homeowners are at risk of displacement or serious health and safety issues. Among occupied housing units 40,021 (4.3%) lack complete kitchens and 40,320 (4.3%) lack complete plumbing.<sup>14</sup> While these indicators are only two housing condition issues, they reflect the high rate of substandard housing in New Mexico. (See Table 10 for housing condition issues by county.)

In listening sessions with local governments, Councils of Government, home rehabilitation service providers and nonprofits serving homeowners, participants stressed the need for home rehabilitation to address health and safety concerns to prevent displacement. Residents of colonias, rural residents, seniors, and residents of older housing stock were identified as being the most in need of critical home repairs. Roofing, heating and cooling systems, plumbing systems and electrical systems were identified as the most critical areas in need of repair/replacement. Participants serving colonias and rural areas stated that many homes are heated with gas stoves or illegal propane tanks, resulting in hazardous conditions, and/or are located far from water systems and are in need of septic tanks that they cannot afford. Participants also emphasized that a lack of available contractors and rising costs of construction materials have led to significant increases in project costs, exacerbating the need among low-income homeowners. Participants suggested that the lack of contractors provides an opportunity to work with workforce development programs to hire trainees in construction trades. Service providers using HOME Investment Partnerships Program (HOME) funding also described their inability to respond quickly to emergency repair needs given the many requirements of the HOME program that must be met before work can begin.

#### Outreach Needs

Listening session participants identified the following groups as being in need of assertive outreach: rural residents, seniors, communities of color, non-English speakers, refugees and unemployed individuals who do not qualify for unemployment insurance. Participants also advocated that assistance be provided regardless of immigration status.

Participants emphasized the need to find appropriate ways to reach at-risk borrowers. A common refrain was that many people fear that offers of assistance are scams. This sentiment was echoed in a public hearing, in which one commenter from Gallup stated that many people have great needs for assistance but are mistrustful of programs and therefore will not apply. Listening session participants emphasized the need for outreach through trusted sources in each community, who are members of the community and speak the community's language. Community-based organizations, faith-based organizations and faith community leaders, organizations led by communities of color, organizations serving immigrants and refugees, trusted elected officials and county emergency operations officers were identified as trusted entities that could assist in reaching populations in need. Suggestions for outreach methods included holding outreach events in which area residents can receive information and application assistance, enlisting servicers to send program information alongside mortgage statements, sending letters signed by a specific person and including the person's contact information, using social media to reach younger generations, making direct phone calls and sending SMS messages to individuals with active claims in the state's unemployment insurance system.

<sup>&</sup>lt;sup>14</sup> ACS 2015-2019 5-Year Estimates

### Evidence of Public Participation and Community Engagement

MFA facilitated public participation and community engagement opportunities to inform the development of this plan that included the following components:

#### Public Hearings on Community Needs

On May 13, 2021, MFA held two virtual public hearings on the Homeowner Assistance Fund. During each hearing MFA presented information on eligible HAF activities and solicited comments from members of the public. MFA advertised these hearings on its website, in an e-mail blast to nearly 2,500 of MFA's community partners and in statewide and regional newspapers. In addition to providing information about the public hearings, the advertisements also allowed for submission of comments in writing to MFA.

#### Listening Sessions with Organizations and Individuals Representing Eligible Homeowners

MFA convened ten listening sessions with over 90 participants from over 50 organizations that represent or serve eligible homeowners, organized around the following categories:

- Mortgage/homeowner assistance providers
- Emergency home repair providers
- Foreclosure prevention counseling and legal services providers
- Local government housing agencies and Councils of Government
- State government agencies
- Mortgage servicers
- Utility providers

#### Public Comment Period and Public Hearings on Draft Plan

To solicit input on the draft plan, MFA held a 7-day public comment period and two virtual public hearings. The draft plan was posted to the MFA website, with paper copies available upon request. The public comment period, public hearings, and information on how to access the draft plan were advertised on MFA's website, in e-mail blasts to nearly 2,500 of MFA's community partners and on social media platforms Facebook, Twitter, Instagram and LinkedIn. A summary of all comments on the draft plan and responses to those comments are included below (added after the public comment period).

## Program Design

HAF funding will be used for mortgage assistance, foreclosure prevention assistance and utility assistance. The following program descriptions provide the eligibility requirements, intended impact on eligible homeowners, the application process, conditions and limitations, a description of the payment process and other available sources of assistance for targeted homeowners for each program.

## Program Descriptions

#### New Mexico Homeowner Assistance Fund (NMHAF)

The New Mexico Homeowner Assistance Fund (NMHAF) will provide up \$20,000 per household to eliminate or reduce housing cost delinquency, including the current month (delinquency plus one month). MFA will make housing payments directly to the mortgage or loan servicer, escrow company or other housing provider and the assistance does not have to be repaid. MFA anticipates allocating \$32,547,856 to NMHAF.

Eligible homeowners who have delinquencies that exceed the household maximum or require foreclosure and/or eviction legal and/or housing counseling services will be referred to the Foreclosure Prevention and Defense Program (described below).

Other eligible housing costs include up to three (3) years of delinquent property taxes and/or one (1) annual homeowner's insurance premium to assist homeowners maintain housing stability and asset protection. Homeowner Association liens or fees, Condominium Associate liens or fees, and common charges may be determined to be an eligible housing cost if there is a risk of displacement of an eligible homeowner.

MFA recognizes that there is not a one size fits all solution to the challenges faced by homeowners. MFA anticipates expanding the Homeowner Assistance Fund as needed to meet the needs of those most negatively impacted by the COVID 19 pandemic and will continue to explore programmatic options including ongoing monthly assistance, loan modification assistance, lien extinguishment, and principle reduction programs.

#### Eligibility requirements

Homeowners are eligible to receive amounts funding under the NMHAF if they (1) attest that they experienced a financial hardship after January 21, 2020 associated with the COVID-19 pandemic, (2) provide income documentation and are found to be at or below 150% of New Mexico Area Median Income (AMI), and (3) currently own and occupy a primary residence in New Mexico.

Homeowners include those with a mortgage, deed of trust, or other consensual security interest on a principal residence and homeowners with consensual contractual agreements on a principal residence such as real estate contracts, lease-purchase contracts, mobile/manufactured home loans, chattel loans and/or land contracts.

Eligible properties include single-family residential properties, condominiums and townhomes, manufactured homes permanently affixed to real property and taxed as real estate, and mobile homes not permanently affixed to real property.

#### Intended impact on eligible homeowners

The intended impacts of the program are eliminating or reducing past due housing payments and other housing related costs, to return homeowners to an affordable housing payment, to help homeowners avoid foreclosure and eviction, to mitigate stripping of home equity, and, ultimately, to maintain homeownership.

#### Application process

Applicants will apply through an online portal that is an expansion of the existing New Mexico Homeowners Assistance Fund Pilot Program. Applications in English and Spanish will be available both online and in paper format. Applicants can also request a paper application be mailed to their residence. MFA has a dedicated team of professionals to assist applicants submit a complete application.

#### Conditions and limitations

Funding will be limited to \$20,000 per household to fund delinquent housing payments, including the current month due, and other eligible housing costs. Per Treasury guidelines, 60% of funds will be set

aside for the homeowners having incomes equal or less than 100% of the New Mexico AMI or less than 100% of the median income for the United States, whichever is greater, and 40% of funds will be available for 150% New Mexico AMI and below and will be prioritized for those who are socially disadvantaged<sup>15</sup>.

If a homeowner is requesting assistance for multiple eligible housing costs such as property taxes, annual homeowner's insurance premiums, HOA or COA fees, whether in conjunction with delinquent payment assistance or separate and apart from a monthly homeownership payment structure, the per household award shall not exceed \$20,000.<sup>16</sup>

Homeowners in active bankruptcy are ineligible. Homeowners who have previously filed for bankruptcy but who are no longer in bankruptcy must provide proof of court ordered "discharge" or "dismissal". Home Equity Line of Credit (HELOC) loans are ineligible.

#### Payment process

MFA will disburse HAF assistance directly via check or electronic funds transfer to the mortgage lender/servicer, land contract holder, manufactured/mobile home lender/park (lot fees), county treasurer or local taxing authority, and/or condominium/homeowners' association.

#### Other available sources of assistance for targeted homeowners

The NMHAF will be the only program providing a housing cost grant to significantly reduce delinquency for homeowners. Community Services Block Grant (CSBG) funding may be available in the future for this type of assistance but will likely be very limited.

#### Foreclosure Prevention and Defense Program (FPDP)

The Foreclosure Prevention and Defense Program (FPDP) will be used to fund HUD-certified Housing Counseling Agencies (HCAs) and Legal Services Providers (LSPs) (taken together, "Intermediaries") who will provide housing counseling and legal services to borrowers at risk of foreclosure and those in need of financial counseling services or assistance with loss mitigation negotiations. MFA anticipates allocating \$2,788,634 to FPDP.

#### Eligibility requirements

Homeowners are eligible to receive FPDP services if they are eligible for NMHAF. Homeowners will be referred for housing counseling services if they are not current on their housing payment after the household maximum funded under NMHAF and, as a result, will require additional resources to maintain homeownership. In addition, homeowners who are facing foreclosure and eviction may receive legal services and/or housing counseling services and leverage NMHAF funds to pay down delinquent payments.

Only HUD-approved Housing Counseling Agencies will be eligible to receive grant funding. Eligible Legal Services Providers must have demonstrated experience in delivering foreclosure intervention and employ attorneys who are licensed to practice law in the state of New Mexico.

<sup>&</sup>lt;sup>15</sup> Eligibility is limited to 150% of New Mexico Area Median Income for all applicants

<sup>&</sup>lt;sup>16</sup> MFA reserves the right to lift this requirement based on need.

#### Intended impact on eligible homeowners

The intended impact is to provide free of charge housing counseling and legal services for New Mexico homeowners experiencing a continued financial hardship resulting in housing payment default and those facing foreclosure or eviction.

HCAs can provide hands-on assistance to address unique financial circumstances and housing issues, focusing on ways of overcoming specific obstacles to achieving a housing goal, including foreclosure avoidance and resolving a financial crisis. This service provides homeowners the assistance they need to ensure they are properly evaluated by housing providers for all options for which they are eligible.

Additionally, HCAs and LSPs are able to provide assistance to New Mexicans in cases where the home is no longer affordable due to a permanent reduction in household income, while maintaining a homeowner's dignity and avoiding the socio-economic trauma and long-term financial impacts of foreclosure. Legal service providers will ensure homeowners are represented during judicial proceedings and are able to provide legal advice.

#### Application process

Intermediaries will be contracted through an RFP process, and funds will be awarded to Intermediaries with demonstrated experience in foreclosure intervention and loss mitigation counseling.

MFA will identify eligible homeowners under the NMHAF using established criteria and refer them to the Intermediaries. The application system also allows for HCAs to work with applicants directly to complete an application, perform an eligibility review and be approved for HCA or LSP assistance separately from the NMHAF.

#### Conditions and limitations

This program will be limited to an aggregate amount up to 5% of the funding from the HAF received by the HAF participant.

#### Payment process

MFA will administer the grant(s) awarded to each eligible Intermediary. The Intermediary will complete services and provide reporting, documentation, and outcomes to MFA. MFA will implement an agreed-upon draw schedule to fund awardees.

#### Other available sources of assistance for targeted homeowners

Of the 13 judicial districts in New Mexico, 4 have formal foreclosure mediation and settlement programs (FSPs). There are a limited number of HCAs and non-profit legal service providers in New Mexico who provide services to a more limited group of income eligible homeowners. Housing counseling resources are scarce in New Mexico so one goal of this program is to increase access to these services for more New Mexicans.

#### Homeowner Utility Assistance Program (UAP)

The Homeowner Utility Assistance Program ("UAP") provides payment assistance on delinquent utility payments directly to utility providers. Utilities included are electric, gas, home energy and water. The

program will be administered the State of New Mexico Department of Finance and Administration ("DFA"). MFA anticipates allocating \$5,270,292 to UAP.

#### Eligibility requirements

Homeowners are eligible to receive amounts under the Utility Assistance Program if (1) they certify they experienced a financial hardship after January 21, 2020, (2) are the owner-occupant of a residence in New Mexico and (3) provide appropriate income documentation showing they are at or below 150% of area median income as well as delinquency documentation. If the homeowner is at or below 150% of the federal poverty level, which is the income limit for the Low Income Home Energy Assistance Program (LIHEAP), the homeowner must also have documentation showing they previously applied and have been reviewed for utility assistance under LIHEAP during the current federal fiscal year, have not received the maximum LIHEAP benefit and still have a utility payment delinquency.

#### Intended impact on eligible homeowners

The intent of UAP is to fund delinquent utility payments for homeowners experiencing a financial hardship associated with the COVID-19 health crisis.

#### Application process

Applicants will apply to the program through a portal that is an expansion of DFA's Emergency Rental Assistance Program (ERAP) software system. DFA will coordinate with the State of New Mexico Human Services Department (HSD), which administers the state's LIHEAP program, to ensure there is no duplication of benefits and to assist households that must first apply to LIHEAP prior to applying for UAP.

#### Conditions and limitations

The maximum benefit may not exceed \$560 per household annually, including any LIHEAP assistance.

#### Payment process

Assistance is remitted by DFA directly to utility providers on behalf of the applicant.

#### Other available sources of assistance for targeted homeowners

LIHEAP is the primary source of utility assistance, although many utility providers offer payment plans. CSBG may also be a source for utility assistance, which is administered through Community Action Agencies ("CAAs"). The State of New Mexico does not believe current programs meet the entire need for utility assistance.

#### Emergency Repair Program (ERP)

During the development of this plan MFA contemplated, but decided against implementing, Emergency Repair Program ("ERP") in the first phase of it is HAF programming. The decision not to implement ERP is based on the challenges to expediently achieving statewide service coverage that surfaced during the ERP pilot. (Lessons Learned section describes these challenges in greater detail.) In the event that the demand for other proposed HAF programs is lower than expected, MFA would contemplate developing and administering ERP. The following sections describe ERP considerations.

ERP would offer home repair services to income-eligible households experiencing financial hardship associated with the COVID-19 health crisis. The repair services must address housing condition issues that threaten immediate displacement. MFA or nonprofit service providers will screen, income qualify applicants, determine scopes of work, and hire contractors to perform home repair for qualified homeowners.

# Methods for Targeting HAF Funding

Effectively and equitably promoting the Homeowner Assistance Fund will require a non-traditional approach to marketing and advertising. In order to overcome the significant disparities between urban and rural homeowners in New Mexico, as well as an a-typical media landscape, the HAF campaign will use a combination of traditional grasstops marketing and advertising, and audience specific organic outreach strategies. Both of these elements will be heavily informed by data acquired before and during campaign execution.

#### Research and Target Audiences

The media campaign will be firmly rooted in data that directly feeds into effective media and messaging strategy. The first element for a media campaign is to develop a deep understanding of our target audiences and develop clear messaging and action-items for the HAF campaign.

The HAF media plan will effectively target outreach and resources to two main audiences:

- Homeowners having incomes equal to or less than 100 percent of the area median income or equal to or less than 100 percent of the median income for the United States, whichever is greater; and
- 2. Socially disadvantaged individuals.

The first step for understanding our target audiences stems in intensive market and programmatic research. Market research includes creating consumer profiles from nationally syndicated sources to define appropriate mechanisms to reach key audiences. Examples of marketing mechanisms include paid media channels (e.g., television, radio), digital, social media, and non-advertising media, such as grassroots outreach. Due to socio-cultural and geographic variations, some of our target audience may not consistently engage with traditional paid advertising, which will make our community engagement strategy all the more important.

The second element to understand our audiences stems in programmatic research. Programmatic research helps us understand barriers to awareness and access for public housing assistance, as well as general barriers to awareness and access for public assistance and funding. By analyzing our target audience, we will arrive at the most effective means to reach them with messaging, but even more importantly, their psychographic and demographic trends.

During this phase, we will conduct a statewide poll in English and Spanish to obtain a baseline of opinions and perceptions of services like Housing Assistance and others. We will also conduct message testing in this phase. We will aim to understand: Where do they live? How much knowledge do they feel they have about personal finance and loans? What is this audience's racial and ethnic breakdown? What are the general perceptions on public assistance? These questions will help inform our messaging strategy and the knowledge gap that we will need to address through our campaign.

Finally, the media campaign will utilize data from the pilot program to identify important characteristics of interested households. The pilot program will also provide insights into any socio-demographic or geographic gaps where additional targeted marketing may be necessary in order to ensure equitable campaign outcomes.

From the audience analysis, polling, and research, the HAF media campaign will be best suited to 1) identify marketing strategies and mechanisms that most efficiently reach out target audiences, and 2) develop the messaging and branding for the HAF campaign.

#### HAF Marketing Plan

An effective multi-channel media strategy starts with a clear key performance indicator and means of measurement. We will measure success using the following benchmarks: 1) web and call center traffic, 2) number of applications, and 3) amount of HAF funds distributed.

The HAF outreach and marketing campaign will include both traditional media and grassroots marketing efforts. The traditional media arm of the campaign will serve as a mechanism to spread awareness around HAF and the available funds/resources for New Mexico families. Traditional media includes, but is not limited to, broadcast and cable television, digital marketing, social media, and print advertising (newspaper, magazine).

A grassroots campaign and community engagement actions will be vital tactics in prompting participants to start and complete the HAF application process. We will cultivate and resource trusted messengers in local, nonprofit, and civic organizations to engage and support participants in the application process.

Additionally, through a series of training sessions, the campaign will establish partnerships with housing agencies, legal aid organizations, and educational organizations to spread awareness and support applicants in the housing assistance process. These tactics will expand the reach of the campaign, while concurrently shortening the distance between potential participants and trusted messengers.

The media campaign will utilize data to adapt campaign messages, placement, and tactics to ensure it is effectively reaching target audiences and implementing appropriate technologies and findings. The campaign will optimize towards highest performing audience segmentation, creative messaging, and tactical approaches. On an ongoing basis, the campaign will: 1) review applicants' demographic characteristics and areas of residence to determine whether applicants are representative of eligible populations and 2) employ new outreach and marketing strategies as necessary.

Importantly, the campaign will utilize a messaging framework that is informed by the disaggregated audience analysis, polling, and research to ensure messages are culturally and linguistically relevant.

While all eligible homeowners will be encouraged to apply, the campaign will leverage centralized outreach sources where many households can be reached with existing communications. This includes those homeowners who have mortgages through existing State, Federal, and local programs that target low- and moderate -income borrowers. The campaign will provide custom materials for their specific outreach needs.

#### Best Practices and Coordination with Other HAF Participants

#### Implementation of Previous Housing Cost Assistance Programs

In the development of this plan and the proposed HAF programs, MFA and DFA have drawn on best practices from other housing cost assistance program implemented since the COVID-19 pandemic: COVID-19 Housing Cost Assistance Program/Homeowner Assistance Program, Coronavirus Relief Fund (CRF) Housing and Homelessness Assistance Program, New Mexico Housing Trust Fund COVID-19 Rental Assistance, New Mexico Emergency Rental Assistance Program. The lessons learned from these programs are reduce barriers to entry for applicants to complete an application, minimize internal complexities, and target marketing to reach hard to serve populations.

Addressing challenges applicants faced supplying supporting documents required by the application proved to increase the success rate of funding eligible households. MFA created easier-to-complete applications by removing the provision that applicants provide documentation to evidence negative financial impact resulting from COVID-19. This requirement proved so difficult for applicants to satisfy that many households in need were denied funding. MFA replaced this requirement with a self-certification form that lead to a higher rate of eligible applications. To further enhance applicant success, MFA trained its staff to provide a high level of customer support to applicants to gather documentation that could not be replaced by self-certification.

MFA learned that well-intentioned internal complexities have unintentional negative consequences. For example, prioritized selection based on certain criteria creates a significant logistical constraint on reviewing applications and disbursing awards. Discrete application windows, rather than on-going opportunities to apply, result in delayed funding approvals for applicants. MFA improved program efficiency by eliminating a "two-tiered" review process while maintaining quality control and peer review measures in the application review process.

Finally, reaching hard to serve populations demands targeted marketing and partnership with social or community service agencies. Sending mailers directly to households in extremely low-income zip codes improved program awareness among communities that may not have otherwise known about the program. Groups such as the elderly, non-English speakers, and rural households have limited access to internet, and despite the availability of a paper application, struggled to complete all components of the application. Partnerships with social or community service agencies helped these populations complete applications and receive funding.

#### Implementation of Previous Emergency Repair Programs

The Emergency Repair Program pilot brought to light the need to have "boots on the ground" to complete task including applicant intake, repair needs assessment, scope of work, and inspection of satisfactory job completion. MFA relied on a HUD HOME program service provider to carry out these tasks during the pilot. Unfortunately among MFA's network of service providers that could be involved in ERP for the duration of HAF do not cover the entire state. As equitable access to HAF programming is a DFA and MFA priority, MFA would have to develop a model to implement ERP "in-house." An "inhouse" model would require hiring and training new permanent staff that would be able to travel across a geographically large state and remotely manage logistics, such as the contractor bidding process, that are typically carried out locally.

While these are not insurmountable challenges to address, doing so demands thoughtful program development, hiring staff with niche expertise, and service provider capacity building. MFA does not believe it would be able to deliver the program in the short term. Consequently MFA has decided against requesting ERP funding for long term HAF programming.

#### Coordination with Other HAF Participants

MFA has actively participated in online community forums and weekly videoconferences convened by the National Council of State Housing Agencies (NCSHA) and has worked with other state Housing Finance Authorities (HFAs) in the western region to share information about program design and logistics. During weekly calls, HAF participants have the opportunity to share program ideas and align best practices, discuss obstacles and leverage the experience of our nationwide housing finance network. MFA, along with NCSHA, and many other HAF participants are also meeting regularly with the Housing Policy Council (HPC), a trade association whose members are among the nation's leading mortgage originators, servicers, insurers & data/settlement service providers, to discuss standardization of mortgage assistance and reinstatement programs nationwide.

In addition, NCSHA hosts an online library where HAF administrators can access forms, policies, best practices, and program guides to name a few resources. In addition, MFA has participated in videoconferences with USDA and Freddie Mac to gain an understanding of the loss mitigation options offered by each. Finally, through our listening sessions, as described in the section Evidence of Public Participation and Community Engagement, MFA has solicited input on homeowner needs and program design considerations from a variety of organizations serving homeowners, including servicers that operate in multiple states.

By leveraging the National Council of State Housing Agencies, MFA has access to contacts at the largest FHA, VA, and USDA/RD servicers, and private label servicers. MFA has staff dedicated to servicer outreach meant to inform servicers who can, in turn, inform their customers.

# Performance Goals

MFA will measure its success targeting of vulnerable populations and impact reducing mortgage delinquencies through its HAF performance based on the outcomes listed in the table below<sup>17</sup>. MFA will monitor that the outcomes are proportional to reflections of the state's population bases on race/ethnicity, income level, and geography.

Program	Goal	Outcome
NM Homeowner Assistance Fund	Targeting vulnerable groups	<ul> <li>Applications submitted by race/ethnicity of head of household</li> <li>Applications submitted by income level (100% AMI and 150% AMI)</li> <li>Applications submitted from each county</li> <li>Applications submitted from non-MSA counties</li> </ul>
	Reducing mortgage delinquencies	<ul> <li>Application approved and funded by race/ethnicity of head of household</li> </ul>

<sup>&</sup>lt;sup>17</sup> MFA is unable to create performance goals bases on mortgage type because not all applicants will have this information nor is it detailed on mortgage statements.

		<ul> <li>Applications approved and funded by income level (100% AMI and 150% AMI)</li> </ul>
		• Applications approved and funded from each county
		• Applications approved from funded non-MSA counties
Utility	Targeting	Applications submitted by race/ethnicity of head of household
Assistance	vulnerable	• Applications submitted by income level (100% AMI and 150%
Program	groups	AMI)
		<ul> <li>Applications submitted from each county</li> </ul>
		<ul> <li>Applications submitted from non-MSA counties</li> </ul>
	Reducing	<ul> <li>Application approved and funded by race/ethnicity of head of</li> </ul>
	utility	household
	delinquencies	<ul> <li>Applications approved and funded by income level (100% AMI</li> </ul>
		and 150% AMI)
		<ul> <li>Applications approved and funded from each county</li> </ul>
		<ul> <li>Applications approved from funded non-MSA counties</li> </ul>
Foreclosure	Targeting	<ul> <li>Households referred to FPDF by race/ethnicity of head of</li> </ul>
Prevention	vulnerable	household
and Defense	groups	<ul> <li>Households referred to FPDF by income level (100% AMI and</li> </ul>
Fund	Reducing	150% AMI)
	mortgage	<ul> <li>Households referred to FPDF from each county</li> </ul>
	delinquencies	<ul> <li>Households referred to FPDF from non-MSA counties</li> </ul>
	Reducing	<ul> <li>Households assisted by FPDP by race/ethnicity of head of</li> </ul>
	mortgage	household
	delinquencies	• Households assisted by FPDP income level (100% AMI and 150%
		AMI)
		<ul> <li>Households assisted by FPDP from each county</li> </ul>
		<ul> <li>Households assisted by FPDP from non-MSA counties</li> </ul>

# Readiness

The State and MFA submit the following readiness assessment as assurance of our ability to effectively deliver the proposed programs.

## Staffing and Systems

HAF will be jointly administered by the State and MFA. The State will administer the Utility Assistance Program ("UAP") and will oversee marketing and outreach. The State has entered into a grant agreement with MFA to oversee the HAF planning process as well as administer two pilot programs – one for homeownership assistance as well as one for emergency roofing repairs. Following acceptance of the HAF Plan, the State will amend its grant agreement with MFA, and MFA will administer the Foreclosure Prevention and Defense Program ("FPDP") and the New Mexico Homeowner Assistance Fund ("NMHAF"), which are described in more detail in Program Design above.

The New Mexico Department of Finance and Administration provide professional and coordinated policy development, analysis, oversight and leadership for initiatives for the State of New Mexico. DFA uses best practices and data-informed decisions for the most efficient and effective use of the public's tax dollars.

The Department employs over 153 staff among six divisions to accomplish this work. These divisions include Administrative Services, Financial Control, Local Government, Board of Finance, Budget, and Office of the Secretary. Collectively these Divisions support the Departmental focus areas of Fiscal Strength and Stability, Quality Services and Thriving Communities. The Department will utilize existing and augmented staff, contracted support, and cross-agency partnerships to ensure effective program delivery, compliance, and reporting.

Additionally, the program will be overseen by senior Department Staff from both the Office of the Secretary and the Local Government Division.

MFA is the state's housing finance agency, established by the state legislature in 1975 to help provide safe, quality affordable housing and related services for low- to moderate-income New Mexicans. MFA is a public body corporate, separate and apart from the State. The organization has 105.5 full time equivalents (FTEs) to help ensure we accomplish our mission of being "New Mexico's leader in affordable housing." MFA administers the state's housing programs from assistance for individuals experiencing homelessness to first-time homebuyers and beyond. Some of our longtime programs include: mortgages for low- to moderate-income homebuyers along with down payment assistance; HOME Investment Partnerships funding for home rehabilitation; Emergency Solutions Grant (ESG) funding for rental assistance; federal housing vouchers; various federal and state financing sources for subordinate development financing; and the Low Income Housing Tax Credit (LIHTC) program. MFA's experience in these programs includes partnering with agencies, working with clients, managing funding and ensuring compliance with all program requirements.

MFA has experience and readiness to quickly and effectively implement the New Mexico Homeownership Assistance Fund program as proposed. Following the onset of the pandemic, MFA has started administering rental and homeownership payment assistance through various sources, including: Coronavirus Aid, Relief and Economic Security (CARES) Act Coronavirus Relief Funds; CARES Act Community Development Block Grant (CDBG-CV) funds; and New Mexico Housing Trust Fund.

This new role led MFA to establish a dedicated in-house, full-time team to administer this assistance, and this team is still active today and is currently administering the New Mexico Homeownership Assistance Fund pilot program, which provides housing payment assistance for homeowners that have experienced financial hardship associated with COVID-19 that are delinquent on their homeownership payments. MFA (1) has established policies and procedures for this program, (2) is running a call center providing customer support, (3) has trained staff on income qualification and high-touch customer assistance, (4) has procured and is utilizing a technology system to help ensure compliance and accurate reporting to Treasury, and (5) identified mortgage servicers and conducted targeted outreach to engage servicers in program awareness campaigns. This 12-person team is led by Amanda Mottershead-Aragon and Samantha Vigil, who have 28 years of combined experience in income qualification and affordable housing compliance. To date, the team has qualified and provided housing assistance to 3,289 households through a variety of non-HAF funding sources. MFA's proposed permanent program is closely aligned with the ongoing pilot, and MFA stands ready to implement immediately upon Treasury approval.

MFA has overseen the administration of a home rehabilitation program utilizing HOME Investment Partnership Funds since 1994. Throughout this successful program, MFA has partnered with agencies across the state and has overseen 2208 rehabilitations completed. MFA is experienced in ensuring programmatic compliance, including income qualification and completion of work, and reporting program outcomes to the federal government. MFA launched a pilot Emergency Repair Program piolet in the southwest portion of the state, as described in more detail in Program Design. MFA established policies and procedures for this program, has trained our partner on program guidelines and requirements and has procured and is utilizing a technology system to help ensure compliance and accurate reporting to Treasury. While the pilot is proving to provide a high demand service, MFA is unable to expand the program in the short-term statewide. However, MFA will reconsider offering a repair program after the other proposed HAF programs are launched.

#### Contracts and Partnerships

The primary partnership guiding the use of New Mexico's HAF allocation is that between the State of New Mexico and MFA. The State recognizing MFA's expertise in housing issues and low- and moderateincome populations entered into a grant agreement on May 12, 2021 that tasks MFA with responsibility for the HAF plan development and pilot program administration. Under this contract the State acts as the oversight entity.

To support the administration of the pilot and long term HAF programs, MFA and the State have executed contracts with software developers to create online systems for application in-take and management. Since September 2020 MFA has worked with Neighborly to develop and launch the software for the COVID-19 Housing Cost Assistance Program/Homeowner Assistance Program, NMHAF, and Emergency Repair Pilot programs. Under its contract with SalesForce for the online system deployed for the Emergency Rental Assistance Program, the State will create an application and applicant management portal for the Utility Assistance Program. MFA also has established a relationship with Robert Half, a temporary staffing agency, to ensure sufficient organizational capacity to deliver the Homeowner Assistance Fund pilot and long-term program.

Throughout the course of the planning process and during the early stages of the pilot program implementations MFA has been cultivating relationships with mortgage servicers as well as agencies that will provide services under the Foreclosure Prevention and Defense Fund. Finally, the State has established relationship with utility providers during the implementation of its Emergency Rental Assistance Program (ERAP). The State will use its ERAP infrastructure to remit assistance for approved applicants to utility providers.

#### Existing and Pilot Programs

MFA launched two HAF pilot programs. The length of the pilot programs will be a minimum of six months or until budgeted funding is expended. Though pilot funds are not yet fully expended, lessons learned from the launch of these programs and the early weeks of their implementation have guided the development of this plan.

#### Homeowner Assistance Fund Pilot Program

On May 18, 2021, MFA launched a pilot Homeowner Assistance Fund program (HAF Program) to provide mortgage, real estate contract, mobile home loan, mobile home lot, property tax and homeowner's insurance assistance, to eligible homeowners who are delinquent on their payments. Homeowners must have a household income at or below 100% of the area median income. The program provides a maximum of \$10,000 of housing assistance per household and serves eligible households statewide. MFA and the State have allocated \$1 million to this pilot program.

Individual homeowners apply to the program via an online application system or by paper application. MFA staff review eligibility and follow up with applicants if further information or documentation is needed. Upon approval, payment is disbursed to the applicable housing provider, such as the loan servicer, escrow company, mobile home lot owner/manager, etc.

As of June 24th, 2021, 725 applications have been submitted. Of which, 182 files have passed the initial eligibility review requesting \$857,945.53 in assistance for an average award amount of \$4,713.99 per file. Included in that total is a total is \$17,762.52 of payments already sent on behalf of six approved households. <sup>18</sup>.

Average Payment	Race of Funded	Ethnicity of Funded	AMI Level of Funded
	Applicants	Applicants	Applicants
\$2,960.42	83% White 17% Black/African American	57% Hispanic/Latino 44% Non- Hispanic/Non-Latino	33% at 30% AMI 17% at 50% AMI 17% at 60% AMI 33% at 80% AMI

#### Figure 1: NM HAF Pilot Program funded applications

#### Emergency Repair Pilot Program

In May 2021, MFA partnered with Southwest Regional Housing and Community Development Corporation (SWRHCDC) to launch the Emergency Repair Program piolet in the southwestern region of the state.<sup>19</sup> Homeowners household income must not exceed 100% of the area median income. The pilot program provides emergency roof repair to prevent homeowner displacement. MFA and the State allocated \$1 million to this pilot program.

Individual homeowners submit paper applications to SWRHCDC. After an initial screening, SWRHCDC enters pre-qualified applicants' information into an online application system for review by MFA staff. MFA staff determine which applicants are eligible. SWRHCDC then inspects the eligible applicants' homes to determine the nature of repairs needed, coordinates with contractors to make the repairs, and inspects the completed work. SWRHCDC submits invoices with supporting documentation to MFA for reimbursement of repair costs and SWRHCDC administrative expenses. MFA staff review invoices and supporting documentation prior to approval of payment to SWRHCDC. MFA staff also perform programmatic monitoring reviews. As of June 23<sup>rd</sup>, the program is processing 86 applications and SWRHCDC will begin roof replacement work in July.

<sup>&</sup>lt;sup>18</sup> All figures will be updated prior to submission of the HAF Plan to Treasury.

<sup>&</sup>lt;sup>19</sup> SWRHCDC service areas include Dona Ana, Luna, Grant, Hidalgo, Sierra and Otero counties.

# Budget

The U.S. Department of Treasury allocated \$55,772,684 to New Mexico under the Homeowner Assistance Fund. The State of New Mexico, in partnership with MFA, is requesting \$50,172,684 in funding for the following programs:

NMHAF Program	\$ 32,547,856
UAP Program	\$ 5,270,292
FPDP Program	\$ 2,788,634
Pilot Programs	\$ 2,000,000
Admin Funding	\$ 7,565,902
Total Funding Requested from Treasury	\$ 50,172,684

# Tables

## Table 1: Homeowner Households at or below 150% AMI MFA Calculation from American Community Survey 2015-2019 5-Year Estimates

County	Homeowner Households Earning Below 150% AMI	All Homeowner Households	% State Homeowner Households Earning Below 150% AMI	% of County Homeowner Households Earning Below 150% AMI
Bernalillo	119,574	168,608	31.9%	70.9%
Catron	1,028	1,162	0.3%	88.4%
Chaves	11,460	16,040	3.1%	71.4%
Cibola	4,354	5,981	1.2%	72.8%
Colfax	3,183	4,157	0.9%	76.6%
Curry	7,443	10,576	2.0%	70.4%
De Baca	348	421	0.1%	82.7%
Doña Ana	31,618	49,113	8.4%	64.4%
Eddy	10,802	14,768	2.9%	73.1%
Grant	5,971	8,067	1.6%	74.0%
Guadalupe	639	867	0.2%	73.7%
Harding	101	138	0.0%	73.3%
Hidalgo	902	1,186	0.2%	76.0%
Lea	10,026	15,045	2.7%	66.6%
Lincoln	4,464	6,096	1.2%	73.2%
Los Alamos	3,142	5,878	0.8%	53.5%
Luna	3,851	5,422	1.0%	71.0%
McKinley	9,951	14,852	2.7%	67.0%
Mora	1,009	1,465	0.3%	68.9%
Otero	11,042	15,172	2.9%	72.8%
Quay	1,227	1,869	0.3%	65.7%
Rio Arriba	6,853	9,784	1.8%	70.0%
Roosevelt	2,771	3,984	0.7%	69.5%
San Juan	20,087	30,813	5.4%	65.2%
San Miguel	5,818	8,166	1.6%	71.2%
Sandoval	28,026	40,082	7.5%	69.9%
Santa Fe	31,786	43,900	8.5%	72.4%
Sierra	3,126	4,106	0.8%	76.1%
Socorro	2,084	3,316	0.6%	62.8%
Taos	6,641	9,249	1.8%	71.8%
Torrance	4,040	4,697	1.1%	86.0%
Union	643	906	0.2%	71.0%
Valencia	17,637	22,010	4.7%	80.1%
New Mexico	371,648	527,896	100.0%	70.4%

## Table 2: Homeowner Households at or below 100% AMI Comprehensive Housing Affordability Strategy 2013-2017 5-Year Estimates

County	Homeowner Households Earning Below 100% AMI	All Homeowner Households	% State Homeowner Households Earning Below 100% AMI	% of County Homeowner Households Earning Below 100% AMI
Bernalillo	61,855	165,610	27.9%	37.3%
Catron	595	1,330	0.3%	44.7%
Chaves	7,100	15,870	3.2%	44.7%
Cibola	3,230	6,450	1.5%	50.1%
Colfax	1,760	3,770	0.8%	46.7%
Curry	4,435	10,665	2.0%	41.6%
De Baca	220	445	0.1%	49.4%
Doña Ana	20,005	48,140	9.0%	41.6%
Eddy	6,325	15,010	2.9%	42.1%
Grant	3,650	8,585	1.6%	42.5%
Guadalupe	500	835	0.2%	59.9%
Harding	70	150	0.0%	46.7%
Hidalgo	695	1,280	0.3%	54.3%
Lea	6,055	15,000	2.7%	40.4%
Lincoln	2,560	6,190	1.2%	41.4%
Los Alamos	1,215	5,545	0.5%	21.9%
Luna	3,420	5,610	1.5%	61.0%
McKinley	8,650	14,130	3.9%	61.2%
Mora	725	1,155	0.3%	62.8%
Otero	6,585	15,170	3.0%	43.4%
Quay	1,210	2,115	0.5%	57.2%
Rio Arriba	5,020	9,850	2.3%	51.0%
Roosevelt	2,020	4,360	0.9%	46.3%
San Juan	13,140	30,645	5.9%	42.9%
San Miguel	4,345	7,770	2.0%	55.9%
Sandoval	15,870	39,815	7.2%	39.9%
Santa Fe	16,905	43,345	7.6%	39.0%
Sierra	2,325	4,020	1.0%	57.8%
Socorro	1,740	3,575	0.8%	48.7%
Taos	4,775	9,365	2.2%	51.0%
Torrance	2,755	4,485	1.2%	61.4%
Union	480	935	0.2%	51.3%
Valencia	11,690	21,720	5.3%	53.8%
New Mexico	221,925	522,940	100.0%	42.4%

# Table 3: Race and Ethnicity of Homeowner HouseholdsAmerican Community Survey 2015-2019 5-Year Estimates

County	Socially Disadvantaged Owner Occupied	Hispanic Owner Occupied	Native American and Alaska Native Owner Occupied	Black or African American	Asian Owner Occupied	Native Hawaiian and Pacific Islander Owner Occupied	Other Race Owner Occupied or Two or More Races	White Owner Occupied
Bernalillo	99,398	70,205	4,084	2,907	3,363	97	18,742	86,955
Catron	154	144	0	0	0	0	10	1,018
Chaves	9,148	7,700	228	68	62	0	1,090	8,057
Cibola	4,741	2,255	2,047	0	5	0	434	1,707
Colfax	2,326	1,876	54	0	0	0	396	2,221
Curry	5,987	3,689	70	183	54	0	1,991	6,537
De Baca	294	178	0	0	4	0	112	243
Doña Ana	34,976	29,557	512	662	254	0	3,991	17,853
Eddy	6,600	5,501	139	207	11	0	742	8,868
Grant	3,634	3,206	152	87	0	0	189	4,609
Guadalupe	804	706	32	0	0	0	66	138
Harding	65	47	0	0	0	0	18	91
Hidalgo	622	523	30	15	0	0	54	606
Lea	8,281	6,899	194	335	65	0	788	7,574
Lincoln	1,432	1,284	46	0	13	0	89	4,715
Los	1,259	734	35	37	177	0	276	4,761
Alamos Luna	3,215	2,892	41	63	21	0	198	2,367
McKinley	13,685	2,069	10,608	106	50	6	846	2,079
Mora	1,656	1,177	2	0	0	0	477	256
Otero	6,573	4,680	704	378	83	0	728	9,185
Quay	811	639	2	17	33	0	120	1,170
Rio Arriba	11,464	7,179	1,069	7	22	2	3,185	1,533
Roosevelt	1,876	1,249	45	10	0	0	572	2,633
San Juan	20,322	12,741	2,873	561	545	75	3,527	22,775
San Miguel	15,577	4,791	8,992	138	190	26	1,440	16,608
Sandoval	9,670	6,410	84	67	42	10	3,057	1,546
Santa Fe	22,523	17,390	1,069	316	416	0	3,332	24,636
Sierra	1,094	842	78	0	6	0	168	3,201
Socorro	2,090	1,572	250	0	92	0	176	1,384
Taos	6,000	4,814	451	6	18	0	711	3,953
Torrance	2,043	1,681	4	7	0	0	351	2,953
Union	325	270	7	0	0	0	48	620
Valencia	15,059	11,818	805	221	107	0	2,108	8,854
New Mexico	313,704	216,718	34,707	6,398	5,633	216	50,032	261,706

County	% NM Socially Disadvantaged Owner Occupied	% NM Hispanic Owner Occupied	% NM Native American and Alaska Native Owner Occupied	% NM Black or African American	% NM Asian Owner Occupied	% NM Native Hawaiian and Pacific Islander Owner Occupied	% NM Other Race Owner Occupied or Two or More Races	% NM White Owner Occupied
Bernalillo	31.7%	32.4%	11.8%	45.4%	59.7%	44.9%	37.5%	33.2%
Catron	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%
Chaves	2.9%	3.6%	0.7%	1.1%	1.1%	0.0%	2.2%	3.1%
Cibola	1.5%	1.0%	5.9%	0.0%	0.1%	0.0%	0.9%	0.7%
Colfax	0.7%	0.9%	0.2%	0.0%	0.0%	0.0%	0.8%	0.8%
Curry	1.9%	1.7%	0.2%	2.9%	1.0%	0.0%	4.0%	2.5%
De Baca	0.1%	0.1%	0.0%	0.0%	0.1%	0.0%	0.2%	0.1%
Doña Ana	11.1%	13.6%	1.5%	10.3%	4.5%	0.0%	8.0%	6.8%
Eddy	2.1%	2.5%	0.4%	3.2%	0.2%	0.0%	1.5%	3.4%
Grant	1.2%	1.5%	0.4%	1.4%	0.0%	0.0%	0.4%	1.8%
Guadalupe	0.3%	0.3%	0.1%	0.0%	0.0%	0.0%	0.1%	0.1%
Harding	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Hidalgo	0.2%	0.2%	0.1%	0.2%	0.0%	0.0%	0.1%	0.2%
Lea	2.6%	3.2%	0.6%	5.2%	1.2%	0.0%	1.6%	2.9%
Lincoln	0.5%	0.6%	0.1%	0.0%	0.2%	0.0%	0.2%	1.8%
Los Alamos	0.4%	0.3%	0.1%	0.6%	3.1%	0.0%	0.6%	1.8%
Luna	1.0%	1.3%	0.1%	1.0%	0.4%	0.0%	0.4%	0.9%
McKinley	4.4%	1.0%	30.6%	1.7%	0.9%	2.8%	1.7%	0.8%
Mora	0.5%	0.5%	0.0%	0.0%	0.0%	0.0%	1.0%	0.1%
Otero	2.1%	2.2%	2.0%	5.9%	1.5%	0.0%	1.5%	3.5%
Quay	0.3%	0.3%	0.0%	0.3%	0.6%	0.0%	0.2%	0.4%
Rio Arriba	3.7%	3.3%	3.1%	0.1%	0.4%	0.9%	6.4%	0.6%
Roosevelt	0.6%	0.6%	0.1%	0.2%	0.0%	0.0%	1.1%	1.0%
San Juan	6.5%	5.9%	8.3%	8.8%	9.7%	34.7%	7.0%	8.7%
San Miguel	5.0%	2.2%	25.9%	2.2%	3.4%	12.0%	2.9%	6.3%
Sandoval	3.1%	3.0%	0.2%	1.0%	0.7%	4.6%	6.1%	0.6%
Santa Fe	7.2%	8.0%	3.1%	4.9%	7.4%	0.0%	6.7%	9.4%
Sierra	0.3%	0.4%	0.2%	0.0%	0.1%	0.0%	0.3%	1.2%
Socorro	0.7%	0.7%	0.7%	0.0%	1.6%	0.0%	0.4%	0.5%
Taos	1.9%	2.2%	1.3%	0.1%	0.3%	0.0%	1.4%	1.5%
Torrance	0.7%	0.8%	0.0%	0.1%	0.0%	0.0%	0.7%	1.1%
Union	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.1%	0.2%
Valencia	4.8%	5.5%	2.3%	3.5%	1.9%	0.0%	4.2%	3.4%
New Mexico	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

County	% County Socially Disadvantaged Owner Occupied	% County Hispanic Owner Occupied	% County Native American and Alaska Native Owner Occupied	% County Black or African American	% County Asian Owner Occupied	% County Native Hawaiian and Pacific Islander Owner Occupied	% County Other Race Owner Occupied or Two or More Races	% County White Owner Occupied
Bernalillo	53.3%	37.7%	2.2%	1.6%	1.8%	0.1%	10.1%	46.7%
Catron	13.1%	12.3%	0.0%	0.0%	0.0%	0.0%	0.9%	86.9%
Chaves	53.2%	44.8%	1.3%	0.4%	0.4%	0.0%	6.3%	46.8%
Cibola	73.5%	35.0%	31.7%	0.0%	0.1%	0.0%	6.7%	26.5%
Colfax	51.2%	41.3%	1.2%	0.0%	0.0%	0.0%	8.7%	48.8%
Curry	47.8%	29.5%	0.6%	1.5%	0.4%	0.0%	15.9%	52.2%
De Baca	54.7%	33.1%	0.0%	0.0%	0.7%	0.0%	20.9%	45.3%
Doña Ana	66.2%	55.9%	1.0%	1.3%	0.5%	0.0%	7.6%	33.8%
Eddy	42.7%	35.6%	0.9%	1.3%	0.1%	0.0%	4.8%	57.3%
Grant	44.1%	38.9%	1.8%	1.1%	0.0%	0.0%	2.3%	55.9%
Guadalupe	85.4%	74.9%	3.4%	0.0%	0.0%	0.0%	7.0%	14.6%
Harding	41.7%	30.1%	0.0%	0.0%	0.0%	0.0%	11.5%	58.3%
Hidalgo	50.7%	42.6%	2.4%	1.2%	0.0%	0.0%	4.4%	49.3%
Lea	52.2%	43.5%	1.2%	2.1%	0.4%	0.0%	5.0%	47.8%
Lincoln	23.3%	20.9%	0.7%	0.0%	0.2%	0.0%	1.4%	76.7%
Los	20.9%	12.2%	0.6%	0.6%	2.9%	0.0%	4.6%	79.1%
Alamos Luna	57.6%	51.8%	0.7%	1.1%	0.4%	0.0%	3.5%	42.4%
McKinley	86.8%	13.1%	67.3%	0.7%	0.3%	0.0%	5.4%	13.2%
Mora	86.6%	61.6%	0.1%	0.0%	0.0%	0.0%	24.9%	13.4%
Otero	41.7%	29.7%	4.5%	2.4%	0.5%	0.0%	4.6%	58.3%
Quay	40.9%	32.3%	0.1%	0.9%	1.7%	0.0%	6.1%	59.1%
Rio Arriba	88.2%	55.2%	8.2%	0.1%	0.2%	0.0%	24.5%	11.8%
Roosevelt	41.6%	27.7%	1.0%	0.2%	0.0%	0.0%	12.7%	58.4%
San Juan	47.2%	29.6%	6.7%	1.3%	1.3%	0.2%	8.2%	52.8%
San Miguel	48.4%	14.9%	27.9%	0.4%	0.6%	0.1%	4.5%	51.6%
Sandoval	86.2%	57.2%	0.7%	0.6%	0.4%	0.1%	27.3%	13.8%
Santa Fe	47.8%	36.9%	2.3%	0.7%	0.9%	0.0%	7.1%	52.2%
Sierra	25.5%	19.6%	1.8%	0.0%	0.1%	0.0%	3.9%	74.5%
Socorro	60.2%	45.3%	7.2%	0.0%	2.6%	0.0%	5.1%	39.8%
Taos	60.3%	48.4%	4.5%	0.1%	0.2%	0.0%	7.1%	39.7%
Torrance	40.9%	33.6%	0.1%	0.1%	0.0%	0.0%	7.0%	59.1%
Union	34.4%	28.6%	0.7%	0.0%	0.0%	0.0%	5.1%	65.6%
Valencia	63.0%	49.4%	3.4%	0.9%	0.4%	0.0%	8.8%	37.0%
New Mexico	54.5%	37.7%	6.0%	1.1%	1.0%	0.0%	8.7%	45.5%

## Table 4: Housing Cost Burden for Homeowner Households with a Mortgage and Annual Household Income Less than \$75,000 American Community Survey 2015-2019 5-Year Estimates

County	Cost Burden for	Total Homeowner	% of NM Homeowner	% of County
	Homeowner Households with a	Households with a Mortgage and Annual	Households with a Mortgage and Annual	Homeowner Households with a
	Mortgage and Annual	Household Income	Household Income	Mortgage and Annual
	Household Income	Less than \$75,000	Less than \$75,000	Household Income
	Less than \$75,000			Less than \$75,000
Bernalillo	36,214	88,050	34.9%	41.1%
Catron	136	1,019	0.1%	13.3%
Chaves	3,006	10,743	2.9%	28.0%
Cibola	771	4,177	0.7%	18.5%
Colfax	1,005	3,113	1.0%	32.3%
Curry	2,349	7,040	2.3%	33.4%
De Baca	68	326	0.1%	20.9%
Doña Ana	9,978	31,115	9.6%	32.1%
Eddy	1,814	7,468	1.7%	24.3%
Grant	1,494	5,594	1.4%	26.7%
Guadalupe	108	674	0.1%	16.0%
Harding	22	98	0.0%	22.4%
Hidalgo	255	857	0.2%	29.8%
Lea	1,706	8,503	1.6%	20.1%
Lincoln	1,339	4,009	1.3%	33.4%
Los Alamos	332	1,112	0.3%	29.9%
Luna	1,085	4,050	1.0%	26.8%
McKinley	1,989	10,620	1.9%	18.7%
Mora	348	1,224	0.3%	28.4%
Otero	2,654	10,334	2.6%	25.7%
Quay	269	1,384	0.3%	19.4%
Rio Arriba	1,400	6,237	1.3%	22.4%
Roosevelt	790	2,592	0.8%	30.5%
San Juan	5,081	18,288	4.9%	27.8%
San Miguel	2,060	6,194	2.0%	33.3%
Sandoval	8,127	20,486	7.8%	39.7%
Santa Fe	9,819	22,316	9.5%	44.0%
Sierra	960	3,342	0.9%	28.7%
Socorro	413	2,205	0.4%	18.7%
Taos	1,537	6,463	1.5%	23.8%
Torrance	1,338	3,577	1.3%	37.4%
Union	134	648	0.1%	20.7%
Valencia	5,241	14,567	5.0%	36.0%
New Mexico	103,842	308,425	100.0%	33.7%

#### Table 5: Financial Hardship in New Mexico Housing Pulse Survey: Average Response During Week 1-Week 28 of the HPS

	Experienced Loss of Employment Income	Last Months' Housing Payment was not made or deferred	No or Slight Confidence in Ability to Make Next month's housing payment or payment will be deferred
Less than \$25,000	54.8%	26.7%	39.1%
\$25,000 - \$34,999	48.8%	24.1%	29.0%
\$35,000 - \$49,999	45.4%	14.5%	23.5%
\$50,000 - \$74,999	42.3%	14.9%	19.1%
\$75,000 - \$99,999	38.0%	8.6%	12.9%
\$100,000 - \$149,999	33.9%	5.9%	8.5%
\$150,000 - \$199,999	30.9%	2.1%	6.7%
\$200,000 and above	27.2%	5.3%	7.1%
Hispanic or Latino	49.5%	16.4%	25.8%
White	37.3%	10.1%	12.5%
Black	45.9%	11.8%	13.0%
Asian	41.5%	11.9%	16.4%
Two or more races & Other races	51.6%	15.1%	22.4%

#### Table 6: Forborne and Delinquent Single-Family Loans in New Mexico

Department of Treasure Supplied Data Federal Reserve Bank Mortgage Dashboard and Federal Agency Data

	Forbearance Rate	Delinquency Rate
Rural	4.2%	2.1%
Urban	3.5%	1.4%
Low-Income	3.9%	1.8%
Non-Low-Income	3.6%	1.5%
High Minority	4.0%	1.8%
Low Minority	3.4%	1.4%
Federal Housing Administration	8.7%	
United States Department of Agriculture	7.1%	
Veteran's Affairs loans	4.2%	

#### Table 7: Non-Forborne90+ Day Delinquent Single-Family Loans CoreLogic Market Trends January 2021

County	90+ Day Delinquent	Loan County	% NM 90+ Day Delinquent	% County 90+ Day Delinquent
Bernalillo	3,176	88,443	38.2%	3.6%
Catron	1	144	0.0%	0.7%
Chaves	272	4,546	3.3%	6.0%

Cibola	54	785	0.6%	6.9%
Colfax	37	1,415	0.4%	2.6%
Curry	204	4,486	2.5%	4.5%
De Baca	-	57	0.0%	0.0%
Doña Ana	706	19,282	8.5%	3.7%
Eddy	244	4,779	2.9%	5.1%
Grant	96	2,326	1.2%	4.1%
Guadalupe	8	126	0.1%	6.3%
Harding	-	7	0.0%	0.0%
Hidalgo	4	109	0.0%	3.7%
Lea	303	4,005	3.6%	7.6%
Lincoln	104	3,244	1.3%	3.2%
Los Alamos	27	3,363	0.3%	0.8%
Luna	53	1,145	0.6%	4.6%
McKinley	52	1,315	0.6%	4.0%
Mora	5	206	0.1%	2.4%
Otero	179	5,065	2.2%	3.5%
Quay	15	285	0.2%	5.3%
Rio Arriba	111	2,400	1.3%	4.6%
Roosevelt	63	1,180	0.8%	5.3%
Sandoval	842	22,271	10.1%	3.8%
San Juan	412	7,750	5.0%	5.3%
San Miguel	74	1,325	0.9%	5.6%
Santa Fe	668	22,188	8.0%	3.0%
Sierra	26	664	0.3%	3.9%
Socorro	30	822	0.4%	3.6%
Taos	160	3,521	1.9%	4.5%
Torrance	41	704	0.5%	5.8%
Union	10	167	0.1%	6.0%
Valencia	333	6,841	4.0%	4.9%
New Mexico	8,310	214,966	100.0%	3.9%

## Table 8: Likelihood of Leaving Home Due to Foreclosure in New Mexico

Housing Pulse Survey: Average Response During Week 1-Week 28 of the HPS

	Very or somewhat likely to have to leave home in the next two months due to foreclosure (4/23/2021)
Less than \$25,000	84.3%
\$25,000 - \$34,999	21.2%
\$35,000 - \$49,999	5.4%
\$50,000 - \$74,999	0.0%
\$75,000 - \$99,999	0.0%

\$100,000 - \$149,999	0.0%
\$150,000 - \$199,999	0.0%
\$200,000 and above	0.0%
Hispanic or Latino	8.3%
White	8.0%
Black	0.0%
Asian	0.0%
Two or more races & Other races	46.3%
New Mexico Total	19.8%

## Table 9: PRC Survey Responses

New Mexico Public Regulation Commission Survey April 2021

Utility/Cooperative	Accounts/Customers in Arrears	Total Residential Delinquency (Accounts in Arrears and Accounts Subject to Disconnect)
Central New Mexico	1,340	\$510,760
Central Valley	415	\$137,483
Columbus	320	\$84,582
Continental Divide	3,258	\$1,669,928
El Paso Electric Company		\$2,261,989
EPCOR	1,840	\$781,814
EPCOR Water		\$781,814
Farmers'	1,657	\$252,840
Jemez Mountains EC	3,074	\$1,352,933
Jemez Mountain Electric Coop		\$1,411,169
Kit Carson EC	785	\$312,236
Kit Carson Electric Coop		\$481,574
Lea County	662	\$284,007
Mora-San Miguel	719	\$237,100
NM Gas Company		
NM Rural Electric Cooperatives (combined)		
NM Water Service Co.	1,205	\$198,697
NORA	307	\$38,812
Otero County	533	\$284,942
Public Service Company of NM		\$19,471,176
Raton Natural Gas	181	\$19,435
Raton Natural Gas		\$1,613
Roosevelt County	30	\$13,238
Sandia Peak Utility Co.	177	\$43,924
Sierra	492	\$138,273
Socorro	1,467	\$483,803

Southwest Public Service Company		
Springer	443	\$54,108
SWEC	115	\$49,999
Zia Natural Gas	2,231	\$1,186,132

## Table 10: Housing Condition Issues

# American Community Survey 2015-2019 5-Year Estimates

County	Lacking Complete Kitchens	Lacking Complete Plumbing	Total Occupied Housing Units	% of State Lacking Complete Kitchens	% of County Lacking Complete Kitchens	% of State Lacking Complete Plumbing	% of County Lacking Complete Plumbing
Bernalillo	4,511	2,993	293,787	11.3%	1.5%	7.4%	1.0%
Catron	280	669	3,756	0.7%	7.5%	1.7%	17.8%
Chaves	1,643	1,559	27,279	4.1%	6.0%	3.9%	5.7%
Cibola	1,435	1,846	11,397	3.6%	12.6%	4.6%	16.2%
Colfax	389	502	10,284	1.0%	3.8%	1.2%	4.9%
Curry	388	380	21,267	1.0%	1.8%	0.9%	1.8%
De Baca	62	67	1,092	0.2%	5.7%	0.2%	6.1%
Doña Ana	2,397	2,865	87,897	6.0%	2.7%	7.1%	3.3%
Eddy	1,553	735	24,576	3.9%	6.3%	1.8%	3.0%
Grant	1,263	817	15,071	3.2%	8.4%	2.0%	5.4%
Guadalupe	425	305	2,670	1.1%	15.9%	0.8%	11.4%
Harding	135	100	567	0.3%	23.8%	0.2%	17.6%
Hidalgo	465	178	2,454	1.2%	18.9%	0.4%	7.3%
Lea	1,426	958	26,610	3.6%	5.4%	2.4%	3.6%
Lincoln	676	512	18,156	1.7%	3.7%	1.3%	2.8%
Los Alamos	46	0	8,384	0.1%	0.5%	0.0%	0.0%
Luna	946	359	11,287	2.4%	8.4%	0.9%	3.2%
McKinley	3,788	5,055	26,312	9.5%	14.4%	12.5%	19.2%
Mora	522	565	2,981	1.3%	17.5%	1.4%	19.0%
Otero	1,340	1,761	31,745	3.3%	4.2%	4.4%	5.5%
Quay	800	446	5,690	2.0%	14.1%	1.1%	7.8%
Rio Arriba	1,896	2,127	20,184	4.7%	9.4%	5.3%	10.5%
Roosevelt	262	238	8,518	0.7%	3.1%	0.6%	2.8%
San Juan	4,036	4,520	51,113	10.1%	7.9%	11.2%	8.8%
San Miguel	1,439	1,237	15,984	3.6%	9.0%	3.1%	7.7%
Sandoval	1,751	1,576	56,585	4.4%	3.1%	3.9%	2.8%
Santa Fe	1,377	1,206	72,988	3.4%	1.9%	3.0%	1.7%
Sierra	413	431	8,555	1.0%	4.8%	1.1%	5.0%
Socorro	954	1,849	8,234	2.4%	11.6%	4.6%	22.5%
Taos	1,432	1,568	20,916	3.6%	6.8%	3.9%	7.5%
Torrance	780	912	8,026	1.9%	9.7%	2.3%	11.4%

Union	382	371	2,347	1.0%	16.3%	0.9%	15.8%
Valencia	809	1,603	31,208	2.0%	2.6%	4.0%	5.1%
New Mexico	40,021	40,310	937,920	100.0%	4.3%	100.0%	4.3%