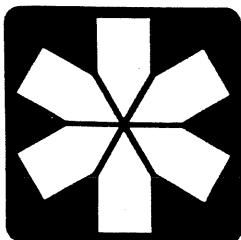


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**REPORT OF THE  
MIGRANT  
FARMWORKER  
HOUSING TASK FORCE**

**JUNE 1990**



**MINNESOTA  
HOUSING  
FINANCE  
AGENCY**



*Pursuant to 1990 LAws, Chap 568*

*Article 4, Section 83*

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This report was prepared by the Multifamily Technical Division of the Minnesota Housing Finance Agency and the Department of Human Services under the guidance of the Migrant Farmworker Housing Task Force. Thanks to the members of the Task Force:

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# MIGRANT FARMWORKER HOUSING TASK FORCE REPORT

## Executive Summary

### BACKGROUND

In 1989, the Minnesota Legislature enacted legislation requiring that the Department of Human Services, in conjunction with the Minnesota Housing Finance Agency, convene a task force to consider issues relating to public assistance and housing for migrant farmworkers. The primary issues of concern in these areas are the rising costs of emergency assistance and the lack of affordable housing for migrant farmworkers.

There are approximately 12,000 to 15,000 migrant farmworkers who come to work in Minnesota's agricultural fields each year. The major agricultural industries that use migrant farm worker labor in Minnesota are sugar beets, asparagus and sweet corn. An estimated 5,000 to 6,000 jobs for migrant farmworkers were created in 1987, a year in which sugar beet growers' revenues in Minnesota were \$203 million.

### HOUSING

Many growers and larger agricultural industries traditionally have provided housing, either on the grower's farm, or in a congregate housing development or camp. Some migrant farmworkers and their families rent housing on the private market and others are vouchered into motels by social service agencies. Factors which affect the nature of the available housing include the need for proximity to the workplace, the short-term nature of the annual need and the fact that the workers have little money when they arrive. The cost of providing the housing is prohibitive because the rents need to be high enough while the housing is occupied to pay for debt on the building year-round.

Other factors in addition to cost which work against providing housing include the difficulty of finding a sponsor, the unpredictability of the need in a given area year-to-year, resistance to placing a development to serve migrant farmworkers in the community, and the long-term commitment to a housing development which may or may not be needed in the future.

### ECONOMIC ASSISTANCE

Many migrant farm workers make use of Aid to Families with Dependent Children-Emergency Assistance (AFDC-EA) when they arrive in Minnesota. The funds are used by many Minnesotans to resolve an emergency and by migrant farmworker families to pay for a place to stay while seeking work. A common pattern of usage is for a migrant farmworker family to apply for assistance and for the county human service agency to make a vendor payment to a motel or landlord on behalf of the family. Those who are provided housing by either a grower or an agricultural processing plant generally do not use AFDC-EA.

It is difficult to estimate how many migrant farmworkers will come to Minnesota each year. Their number depends on word-of-mouth information about work availability, crop conditions in the workers' home states, and the previous year's growing conditions. The current system requires migrant farmworker families to arrive in Minnesota with neither housing nor employment secured. In addition, much of the existing housing is unsuitable for use by migrant farmworker families. This

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may be because long-term leases are required, housing is too expensive, or it is often unsuitable for large families.

### **STATE OPTIONS**

In dealing with the issue, a number of options exist for the State. One option is to maintain the current system. While there are problems with the present system, the relatively high cost of paying for motel housing is offset by the fact that such housing requires no long-term investment on the part of the State.

A second option is to expand the State's Migrant Farmworker Housing Program which was funded with a \$100,000 appropriation to the Minnesota Housing Finance Agency by the 1990 Legislature. The program is set up to rehabilitate or purchase primarily mobile homes and abandoned farmsteads to be used by growers to provide housing for migrant farmworkers. The demonstration project, which recently began, will be reviewed in a report to the Legislature to be prepared for the 1991 Legislative Session. An explanation of the program is provided in the attached sheets.

A third option is to utilize the Farmer's Home Administration Farm Labor Housing Grant and Loan Program. This is an existing program which provides some grant funds and low interest loans for migrant farmworker housing developments. The housing produced under this program can only be used for migrant farmworkers. However, because of the short growing season in Minnesota, it is difficult for such projects to succeed financially. As a result, the Minnesota FmHA office is reluctant to fund such projects.

A fourth option is to increase the availability of grower-provided housing - either through incentives or regulation. Incentives could be grant or loan funds such as those available through the existing State and Farmer's Home programs.

### **CONCLUSION**

A significant increase in new dollars for migrant housing is not likely from either state or federal sources. A careful evaluation of the modest state effort, described in the attached sheets, will be made. It is likely that a continuation of this approach — a small amount of state dollars as an incentive for growers to do more — is the most appropriate action by the state; however, a final decision on this cannot be enacted until the current program is evaluated.

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# MIGRANT FARMWORKER HOUSING TASK FORCE REPORT

## I. DISCUSSION OF LEGISLATION

### Introduction

It is public policy in Minnesota to provide shelter to indigent families with children in emergency situations. This policy extends to migrant farmworker families who arrive in Minnesota in search of work. The influx of migrant farmworker families each summer has resulted in local human service agencies facing unpredictable and uncontrollable costs for emergency shelter.

Considerable controversy surrounds the issue of migrant farmworkers receiving public assistance in Minnesota. Some communities, responding to continued conflict and miscommunication about the issue, have formed task forces to increase public dialogue.

In 1989, the Minnesota Legislature enacted legislation which requires the Department of Human Services, in conjunction with the Minnesota Housing Finance Agency, to convene a task force to consider issues relating to public assistance and housing for migrant farmworkers. The Migrant Farmworker Housing Task Force is composed of representatives from the migrant farmworker community, representatives of communities in which migrant farmworkers reside, employers of migrant farmworkers, Minnesota Housing Finance Agency and Department of Human Services staff, and representatives of advocacy groups. To date, the Task Force met twice - once in Moorhead and once in Willmar - with much of the discussion focused on the availability and quality of existing housing and the use of public assistance funds to pay for emergency housing. Data was presented to the Task Force for review and members shared their experiences in dealing with migrant farmworker housing issues. This report was prepared to reflect issues and concerns identified in the meetings.

The primary issues involve the rising costs of emergency assistance and the lack of affordable housing for migrant farmworkers. Motels and hotels, the primary source of emergency housing for social service agencies, are inappropriate to house large families over long periods of time. Rental housing, meanwhile, is either scarce or expensive. In some instances, landlords are unwilling to rent to migrant farmworker families. Furthermore, migrant farmworker families do not have the resources to pay damage deposits and/or the first month's rent. Many growers who once provided housing for their workers no longer continue this practice. Ultimately, the Minnesota Department of Human Services is responsible for housing families and individuals who travel to Minnesota to find farm work if employer-provided housing is not available.

The cost of providing shelter is only one factor which contributes to the controversy surrounding the presence of migrant farmworker families in Minnesota. Other factors include general prejudice against public assistance recipients, racism and the perception that sugar beet growers are, in effect, subsidized by their employees' use of public assistance. (Racism is an issue because the majority of migrant farmworkers in Minnesota are Hispanics/Chicanos. Documented cases of discrimination against migrant farmworkers exist in the provision of social services and housing.)

### Migrant Farmworkers in Minnesota

There are approximately 12,000 to 15,000 migrant farmworkers who come annually to work in Minnesota's agriculture fields. The majority of these migrant farmworkers are from Texas, primarily the Rio Grande Valley, Winter Garden area, Laredo, El Paso and other Texas regions that employ farm labor.

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Some migrant farmworkers travel between Texas and Minnesota as work is available. Others journey to different parts of the country, passing randomly through Minnesota on their work route. Factors that influence the choice of work pattern include family tradition, economic conditions in Texas and the availability of work in Minnesota.

The major agricultural industries that use migrant farmworkers in Minnesota are the sugar beet, asparagus and sweet corn industries. Sugar beets are grown in the south central and western parts of the state while asparagus and sweet corn are produced in southern Minnesota. The sugar beet industry is one of the most important agricultural industries in this state, with growers earning \$203 million in 1987. That same year, the sugar beet harvest in Minnesota and North Dakota created an estimated 5,000 to 6,000 jobs for migrant farmworkers.

### **Migrant Farmworkers in the U.S.**

Migrant farmworkers typically are defined as farmworkers who must travel to work and are unable to return to their permanent residence within the same day. The agriculture industry generally hires migrant farmworkers to perform such farm labor as soil preparation, planting, cultivating, harvesting, and packing and canning agricultural crops or products. In 1982, the 80,000 fruit and vegetable farms in the U.S. provided farm jobs for about one million migrant farmworkers. A ready supply of mobile, hand labor is an established and necessary aspect of the agriculture industry in the United States, with migrant farmworkers engaged in physical work that other laborers reject.

## **II. HOUSING CONDITIONS**

### **Regulations and Monitoring**

The Agency which bears primary responsibility for the inspection and regulation of migrant farmworker housing in Minnesota is the Minnesota Department of Health (MDH). It has issued rules under MDH 204 which detail the basic standards for safety and sanitation for migrant labor camps. Migrant labor camps are defined as "one or more buildings or structures, tents, or vehicles, together with the tract of land on which they are situated, used as living quarters by seasonal or temporary migrant agricultural workers." The standards apply to virtually all housing for migrant farmworkers in Minnesota; therefore, according to the rules, individuals who want to provide such housing must apply for and be granted a permit by the MDH.

Due to limited resources, the MDH currently inspects migrant farmworker housing only upon receipt of a complaint. Absent a routine housing inspection, MDH has suggested abolishing the rules governing such housing. Migrant Legal Services opposes this action on the grounds that, without such rules, there would be no legal remedy to address unsafe and inadequate migrant farmworker housing in Minnesota.

Currently, two federal-level agencies have regulations which affect migrant farmworker housing. The Employment and Training Administration (ETA) of the U.S. Department of Labor (DOL) has migrant farmworker housing standards which an employer must meet in order to use the DOL's interstate job order service. If an employer chooses to use the service to recruit workers, an inspector from the local Job Service office must certify that the housing to be provided meets ETA standards. In addition, the Department of Occupational Safety and Health Administration (OSHA) is responsible for monitoring migrant farmworker conditions. In 1976, OSHA issued stringent housing standards and increased enforcement nationwide as a result of publicity over housing conditions for

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migrant farmworkers in Florida. While OSHA has statutory responsibility for enforcement, a portion of the appropriation language has for some time limited the agency's involvement, excluding migrant farmworker housing which pertains to 11 or fewer workers. This effectively exempts most migrant farmworker housing in Minnesota from OSHA inspection, except in cases where OSHA receives complaints or uncovers violations during the investigation of an accident investigation.

### **Current Types of Housing Available**

Fear of OSHA regulation still exists among growers even though OSHA does not routinely monitor such housing. The decision by many growers to discontinue providing housing for their employees is blamed on the expense of keeping housing in line with government standards. However, it's noteworthy that growers pay the same rates for labor whether or not they provide housing. With migrant farmworkers now working for many different growers over one summer, there is some fear of subsidizing growers even if just a portion provide housing. Thus, it is to the growers' economic advantage not to provide housing unless they believe the labor would otherwise be unavailable.

In December 1989, the MHFA conducted an informal survey of 10 county social service agencies in Minnesota with the highest combined payments of Minnesota Migrant Council emergency vouchers and AFDC-Emergency Assistance to migrant families. Those counties were: Chippewa, Clay, Kandiyohi, McLeod, Norman, Olmsted, Polk, Ramsey, Renville and Wilkin. Figures on the amount of economic assistance to migrant farmworkers in each county were requested, as was information about the current housing situation for migrant farmworkers in each county. Furthermore, counties were asked to assess the availability and adequacy of some types of housing: grower-provided housing, rental housing, motels and other housing alternatives available in a particular county. Ramsey and Olmsted Counties reported that they had no migrant farmworkers and therefore did not complete the surveys. No information was received from Renville and Chippewa Counties. Consequently, survey results were collected from only six counties.

According to the survey's narrative responses, grower-provided housing in Minnesota generally is of good quality and size. Housing costs range from free to \$10 per night. The number of units in each county varies from about seven to 30 units, except in McLeod County where Green Giant offers dormitory-style housing for 548 workers. Overall, there is not enough grower-provided housing available, especially in counties with large numbers of sugar beet growers. There is little affordable rental housing available for migrant farmworkers and their families, and the available units are often too small. In addition, the quality of available rental housing varies.

Sometimes, landlords are reluctant to rent to migrant farmworkers for reasons ranging from racism on the part of landlords, fear of damage to the units by migrant families and conflicts with other tenants. In some instances, growers rent housing for their workers. Emergency Assistance funds can be used to pay for damage deposits and rent for migrant families.

When migrant farmworkers arrive in search of work, housing them on an emergency basis becomes the responsibility of human service agencies. County social service agencies and

the Minnesota Migrant Council offices provide assistance in finding housing. Motels are often used and are reported to be of good quality, adequate availability and in close proximity to work. The

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costs range from \$20 to \$50 per night. The rooms are not suited for families or for extended stays as they are small and lack cooking facilities. Emergency Assistance funds are often used to pay for motel stays.

Alternative housing, which includes staying with relatives or friends that have relocated to Minnesota, is an option for some migrant farmworkers. Often, young families will relocate to attend vocational schools and, upon their parent's return to Minnesota, the students will provide shelter to the extended family. This is not an ideal situation since in most cases the young families live in small apartments and additional people create new problems as well as intensify existing ones. Other housing alternatives mentioned in the survey include emergency shelters, mobile homes, campgrounds and cars. While the quality of this type of housing is very poor, migrant farmworkers may be reluctant to complain about housing conditions for fear of losing their jobs.

### **Industry-Provided Housing**

The asparagus industry in Minnesota has a history of providing housing for its migrant farmworkers. The Owatonna Canning Company (OCC) is Minnesota's largest employer of migrant farmworkers in the planting and harvesting of asparagus. In recent years, the number of migrant farmworker families hired by OCC has been between 100 and 150 families. The company also hires individual migrant farmworkers in its canning operations in Owatonna. OCC hires several crewleaders who in turn recruit migrant farmworkers in Plainview and south Texas. The canning company provides housing for migrant farmworker families and individuals in the form of labor camps located in Dodge and Steele Counties, with the majority in Dodge County. Each labor camp provides housing for approximately 30 to 35 families. During 1989, the OCC used four of its seven labor camps.

Essentially, the migrant farmworkers are hired in Texas and do not come to Minnesota until the OCC informs the crewleaders that the work is to begin. The migrant farmworkers snapping asparagus are paid piece rate (by the pound) or the hourly minimum wage, whichever is greater, and those working in other operations are normally paid by the hour. All workers are paid on a weekly basis.

Most of the migrant farmworker families begin to arrive during the third or fourth week of April. The work involving snapping asparagus is normally completed by June. After completing the asparagus field work, many of the families stay to work in OCC's canning operation. Because these operations generally do not coincide, many of the families work for local farmers in the interim. The migrant families continue to live in OCC's labor camps which usually are rent-free during this period.

When migrant farmworkers recruited/hired by the OCC arrive in Dodge or Steele Counties, they usually don't have an AFDC-EA need for housing. Normally, they apply for food stamps and, depending on their weekly earnings, they might qualify for food stamps.

Migrant farmworkers who work in the production of asparagus have little, if any, impact on AFDC-EA expenditures. This is borne out in Stearns County by the total lack of AFDC-EA expenditures in 1989. This is because the employer either provides housing or has secured funding to provide housing, and pays wages on a timely and frequent basis.

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### **Factors Which Affect the Nature of Housing Availability**

The choice of housing for migrant farmworkers is affected by a number of issues including the location of the work, period of occupancy, and the cost and size of the housing. Housing needs to be accessible to the workplace. It also needs to be centrally located in order to be accessible to different growers' fields, located on a grower's farm, or located next to an agricultural processing plant. Some field operations have to be performed over an extremely short time when a ready supply of workers is crucial. Traditionally, employers have provided housing for migrant farmworkers. The need for hand labor cannot be met by local communities or the local labor pool. Also, most rural communities do not have readily available temporary housing for seasonal employees. Major employers, i.e., Green Giant and Owatonna Canning Company, recognize this dilemma and provide housing. It appears that the major problems occur primarily in the sugar beet industry of the Red River Valley and only with some of the individual growers.

It should be noted that counties, cities, and local housing authorities are reluctant to sponsor housing for migrant farmworkers. Given the inadequate supply of housing for migrant farmworkers, local governments are concerned that their communities will become responsible for more than their fair share of workers. Many small town residents feel that migrant farmworkers bring problems to the communities due to language barriers, cultural differences and a lack of familiarity with Minnesota laws.

Another factor in the availability of housing for migrant farmworkers is the limited period the housing is occupied. It is difficult for social service agencies to predict when and for how long the housing will be needed. The number of families which arrive each year is dependent on word-of-mouth information about where work is available, the actual need for workers in the area, and working conditions in other parts of the country. For example, due to the recent freeze in the southern part of the United States, more workers are expected to come north in 1990 than in previous years. Also, the Immigration Reform and Control Act of 1986 increased the number of resident alien workers available for work which strains resources and depresses wages in some areas. Because housing for migrant farmworkers is only inhabited for part of the year, it is difficult to generate income for operating expenses or debt service. In Minnesota, the growing season is especially short, resulting in unusually high rents during the summer months in order to support debt and operation of the buildings for 12 months.

### **III. USE OF ECONOMIC ASSISTANCE**

Aid to Families with Dependent Children - Emergency Assistance (AFDC-EA) is a federal program that makes payments to families with children that do not have the resources to prevent imminent destitution. As of January 1, 1990, AFDC-EA will be funded 50% by the federal government and 50% by state government. Prior to that date, it was funded 50% by the federal government, 45% by the local county, and 5% by state government.

AFDC-EA is the program most affected by the lack of housing for farmworkers. Migrant farmworkers do qualify for and receive other public assistance benefits, i.e., food stamps, medical assistance, general assistance, and AFDC, but this report will only focus on AFDC-EA because of its direct relationship to housing.

Eligibility for AFDC-EA is broadly defined to allow the program to meet a wide variety of emergencies. A family must be in emergency need, and all resources available to the family must be insuffi-

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cient to resolve the emergency. There are no set income or property limits, although property which can be liquidated in time to meet the emergency must be sold, unless doing so would create another emergency.

For example, a car may have to be sold to pay for temporary shelter unless the sale of the car would prevent the earning of income and, therefore, another emergency. In the case of migrant farmworkers, the sale of their automobile would render them without transportation to work as well as eliminate their means of returning to their permanent home.

While there are some payment limits on AFDC-EA, the general rule is that the program will spend the amount required to prevent destitution. A family may receive AFDC-EA for only one 30-day period, although in some cases a family may receive the cash equivalent of two 30-day periods. In either instance, AFDC-EA may only be provided once in a 12-month period.

Eligibility for AFDC-EA requires that a family meet the federal residency requirement. A family may establish residency by: (1) being physically present in Minnesota with the intent to make Minnesota its home; or, (2) having entered Minnesota with a job commitment or seeking employment in the state (whether or not currently employed). The majority of migrant farmworkers meet the residency requirement with their intent to work. The federal government added this condition in 1980. Prior to that time, migrant farmworkers did not qualify for AFDC-EA because they did not intend to make Minnesota their permanent home. The intent-to-work provision applies to **all** persons applying for AFDC-EA.

A common pattern of AFDC-EA use is that a migrant farmworker family will come to Minnesota seeking employment, find no affordable shelter, and apply for AFDC-EA through the county human service agency to resolve this need. The county human service agency typically makes a vendor payment to a hotel, motel, or rental housing unit. In many cases, the migrant farmworker family has received a two- or three-day vendor payment for shelter from the Minnesota Migrant Council prior to applying for assistance from the county human service agency. Because the Minnesota Migrant Council's primary responsibility is employment and training, it does not have sufficient funds to provide long-term shelter assistance.

Migrant farmworker families who work for employers that provide housing generally do not receive AFDC-EA. A county's AFDC-EA expenditures for migrant farmworker families are affected by the following factors:

1. Whether housing is provided by the employer;
2. Whether the county has a supply of private housing, such as motels, apartments, temporary housing, college student housing; and,
3. Whether the neighboring county improperly refers clients to them.

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It also appears that counties which border North Dakota show greater expenditures. The following counties have employers that generally provide housing for their migrant farmworker employees: Dodge, LeSueur, McLeod, Steele and Stearns. The combined number of migrant farmworkers receiving AFDC-EA during the calendar year 1989 for these counties was 84 cases for a total of \$19,875. This contrasts sharply with the expenditures of Norman, Wilkin, Clay and Polk Counties where the predominant agricultural industry is sugar beets. The combined AFDC expenditures for these counties was \$315,275 for 852 cases in 1989. This amounts to 77% of the state's expenditure for migrant family AFDC-EA and only 3.1% of the state's total expenditure for AFDC-EA that year.

For the past several years the availability of housing for migrant farmworker families has been a severe problem in the Red River Valley, accounting for the high public assistance expenditures. Traditionally, Minnesota's sugar beet growers have provided housing for their migrant farmworkers, but in recent years, some growers discontinued this practice. In addition, the payment system utilized by sugar beet growers has a direct effect on migrant farmworkers qualifying for public assistance. Traditionally, sugarbeet growers pay migrant farmworkers when the work is completed, although most growers will provide advances/loans after the work is started and some will provide advances/loans before the work is started — depending on the grower's relationship with the migrant farmworker family.

#### **IV. PROBLEMS WITH THE CURRENT SYSTEM OF PROVIDING HOUSING**

It is difficult to estimate how many migrant farmworkers will come to Minnesota each year. Their number generally depends on word-of-mouth information about work availability, on crop conditions in the southern states where most workers reside, and on the previous year's growing conditions. Workers without a job commitment still come north hoping to find work. Such an unpredictable system makes it hard to estimate housing demand in advance. The direct recruitment of migrant farmworkers in their home states would eliminate some use of emergency assistance by allowing migrant families to go directly to grower-provided housing upon arriving in Minnesota. The current system requires migrant families to arrive in Minnesota with neither housing nor employment secured. This can lead to reliance on AFDC-EA while the migrant family searches for work and housing.

Responses to the MHFA survey of counties suggest that growers should share some of the responsibility for housing. Migrant farmworkers receive not only housing assistance but other economic assistance as well. The agricultural industry's use of low-cost labor results in the necessary use of public assistance programs by migrant farmworkers.

Migrant farmworkers and their families still encounter community resistance to their presence in the small rural Minnesota towns near which they work. It appears the farm workers bring a new culture and language to otherwise homogeneous areas which can result in conflicts.

Furthermore, much of the existing housing available is unsuitable for migrant farmworkers for a variety of reasons. Market-rate rental housing is often too expensive, especially when damage deposits and possibly long-term leases are required. In addition, migrant families can be very large and motel units are often too small to safely and comfortably accommodate the workers.

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## V. OPTIONS FOR THE STATE

### **Option 1: Maintain Current System**

The Minnesota Migrant Council estimates that 12,000 to 15,000 migrant farmworkers come to Minnesota each year, often without essential resources. Some use foodstamps and emergency assistance to meet their basic needs while waiting to start work or receive pay.

Meanwhile, debate in Congress over continued import controls on sugar provide for an uncertain future for sugar beet growers. This uncertainty affects housing which, as a long-term investment, requires a long-term need to make it financially feasible or desirable. The relatively high cost per night of motel housing may be offset by the fact that it requires no long-term investment by the state, local government, or grower. If future demand for migrant farmworkers diminishes or ceases, fewer motel rooms would need to be rented. Given the economic value of the industry to the state and the state assumption of the cost of public assistance programs, the best approach may be to maintain the current system.

### **Option 2: Expand the State's Migrant Farmworker Housing Program**

The legislature appropriated \$100,000 to be used as a migrant housing demonstration program. The Minnesota Housing Finance Agency currently provides grants and loans to a variety of specialized multi-family housing developments serving groups such as the homeless, developmentally disabled, low income persons living alone who do not qualify for most types of housing assistance and persons who have a mental illness.

The MHFA issued an RFP on November 30, 1989 with proposals due January 31, 1990. In contrast to other Agency programs, interest in and inquiries about the program were minimal. This echoed the experience of MHFA staff in talking with interested parties about possible migrant farmworker housing solutions. Discussion inevitably stalled when the question of sponsorship arose.

The MHFA received one proposal which would provide grants to individual growers on a matching basis as an incentive for them to provide housing on their farms. It is projected to add 30 units of housing in the next year — primarily mobile homes and rehabilitation of existing structures that previously have not been in use. If a contract is entered into for this proposal, a report on the effectiveness of this type of program will be prepared at the end of 1990.

### **Option 3: Utilize Existing Farmer's Home Administration Farm Labor Housing Grant and Loan Programs**

The Farmer's Home Administration has grant and loan money available to provide migrant farmworker housing. There is one project in Minnesota - a 23-unit apartment building in Brooten - which made use of both grant funds and loans with an interest rate of 1%. Despite the low cost of the debt service, the project is still struggling without enough income to cover year-round operating costs. The growing season is short and insurance costs on an empty building are high. The development is currently being subsidized by the owners. The Minnesota FmHA is reluctant to finance further developments due to the short growing season in Minnesota which affects the occupancy of the project. FmHA rules prohibit any other use of the facility.

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While a similar project in North Dakota is operating successfully, the local Farmers Home Administration determined at the onset that substantial operating subsidies would be required throughout the life of the project.

**Option 4: Increase Availability of Grower-Provided Housing**

The areas of the state with the highest public assistance costs used for housing are those areas which use migrant farmworkers on individual farms doing field work. In most cases, the workers are employed with a single farmer at a time - although that time may be extremely short. A solution would be to provide regulations to require growers to provide housing on their farms or to require grower cooperatives to provide housing. The advantage to this is that the cost would be borne by the industry which employs the labor.