

# Consolidated Annual Performance and Evaluation Report (CAPER)

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PROGRAM YEAR 2021: JUNE 1, 2021 – MAY 31, 2022

City of Saint Paul, Minnesota

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## **CR-05 - Goals and Outcomes**

### **Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)**

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

This report summarizes to the U.S. Department of Housing and Urban Development (HUD) how the City of Saint Paul (City) invested and leveraged HUD funds from June 1, 2021 through May 31, 2022 (PY2021). The City uses HUD funded Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) and Emergency Solutions Grant (ESG) programs mostly for housing related activities, including rehabilitation and development of single family and multi-unit housing, and homelessness prevention and shelter services. To complement the housing effort, CDBG funds are also used for public service activities, public improvement projects, and activities promoting economic development.

HUD in response to the COVID-19 pandemic through the Corona, Aid, Relief, and Economic Security Act (CARES Act) provided the City with additional funds in 2020 in two separate allocations: CDBG–CV of \$6,061,828 and ESG–CV of \$7,992,924. HUD also provided waivers and flexibilities within each of its funding programs. The City continued to use these funds and waivers in PY2021 to prevent, prepare for, and respond to the COVID-19 pandemic. CDBG–CV funds were committed to various public services, including emergency rental assistance navigators, housing stabilization, meal support, career labs, family distance learning programs and low and no contact library services. All programs are currently underway. In PY2021 889 persons received assistance to ensure access to ERA support, 4,237 people benefitted from the distance learning services and 92 households received mortgage stabilization assistance.

The City also subgrants CDBG dollars to community development organizations to achieve housing and economic development goals stated in the Consolidated Plan. The City worked with 3 community development organizations to assist low- to moderate-income (LMI) homeowners with housing rehabilitation. The City subgranted CDBG dollars to 3 community development organizations to assist businesses with economic development activities in low- to moderate-income areas (LMA) and/or serve LMI residents (job creation/retention). CDBG funds were also used to support an employment program for Saint Paul youth, ages 14-21, from an LMI family or who had a barrier to employment. Also-funded were Fair Housing initiatives and the Block Nurse program to serve older adults and their caregivers, providing in-home health visits, rides to appointments, grocery shopping/errands, and caregiver support and respite, all to help older residents remain at home as long as possible.

CDBG funded community engagement through 10 neighborhood District Councils (DCs) that represent LMI residents in LMAs. DCs are neighborhood-based non-profit organizations that serve as liaisons between residents and the City, engaging residents on issues directly affecting DC residents, such as residential and commercial development.

The City is continually challenged to effectively address community development priorities, goals and strategies with HUD resources as the need continues to exceed the resources. This was worsened with the COVID-19 pandemic directly affecting the City’s residents and community development needs and created some delay and delivery of HUD funded programs and activities. The City continues to expand economic opportunities, preserve and create affordable housing, address the needs of those experiencing homelessness or are at-risk of homelessness, provide accessible public services for vulnerable populations, affirmatively further fair housing and leverage its HUD funding to make significant, sustainable change in the community.

**Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)**

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Community Engagement	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	906500	342355	37.77%	181300	125740	69.35%
Development of New Housing	Affordable Housing	CDBG: \$ / HOME: \$	Rental units constructed	Household Housing Unit	75	17	22.67%	15	17	113.33%

Development of New Housing	Affordable Housing	CDBG: \$ / HOME: \$	Rental units rehabilitated	Household Housing Unit	0	0		6	0	0.00%
Development of New Housing	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Added	Household Housing Unit	0	8		0	5	
Development of New Housing	Affordable Housing	CDBG: \$ / HOME: \$	Housing for Homeless added	Household Housing Unit	0	0		0	0	
Development of New Housing	Affordable Housing	CDBG: \$ / HOME: \$	Housing for People with HIV/AIDS added	Household Housing Unit	0	0		0	0	
Economic Development	Non-Housing Community Development	CDBG: \$	Facade treatment/business building rehabilitation	Business	15	7	46.67%	3	4	133.33%
Economic Development	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	25	29	116.00%	5	20	400.00%
Economic Development	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	10	3	30.00%	2	1	50.00%
Homeless Prevention	Homeless	ESG: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	625	150	24.00%	125	95	76.00%

Homeless Prevention	Homeless	ESG: \$	Homeless Person Overnight Shelter	Persons Assisted	15000	5559	37.06%	3000	2116	70.53%
Homeless Prevention	Homeless	ESG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0		400	0	0.00%
Homeless Prevention	Homeless	ESG: \$	Homelessness Prevention	Persons Assisted	2000	607	30.35%			
Homeowner Housing Rehabilitation	Affordable Housing	CDBG: \$	Homeowner Housing Added	Household Housing Unit	0	3		0	0	
Homeowner Housing Rehabilitation	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	255	194	76.08%	51	103	201.96%
Homeowner Housing Rehabilitation	Affordable Housing	CDBG: \$	Housing for Homeless added	Household Housing Unit	0	0		0	0	
Homeowner Housing Rehabilitation	Affordable Housing	CDBG: \$	Housing for People with HIV/AIDS added	Household Housing Unit	0	0		0	0	
Public Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	35625	16585	46.55%	8960	9000	100.45%
Public Services	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15000	11548	76.99%	3000	10201	340.03%

Remediation of Substandard Properties	Non-Housing Community Development	CDBG: \$	Buildings Demolished	Buildings	85	6	7.06%	17	1	5.88%
Rental Housing Rehabilitation	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	130	136	104.62%	26	0	0.00%
Rental Housing Rehabilitation	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	0		0	0	
Rental Housing Rehabilitation	Affordable Housing	CDBG: \$	Housing for Homeless added	Household Housing Unit	0	7				
Rental Housing Rehabilitation	Affordable Housing	CDBG: \$	Housing for People with HIV/AIDS added	Household Housing Unit	0	0				
Youth Employment	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1290	455	35.27%	258	215	83.33%

**Table 1 - Accomplishments – Program Year & Strategic Plan to Date**

**Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.**

Creation of affordable housing through construction or rehabilitation and the preservation of existing affordable housing are the highest priorities for City investment of CDBG and HOME funds. As shown in Table 1, the City met most of the 2021 Annual Action Plan goals for the

program year, however, the Coronavirus pandemic (COVID-19) has delayed starting or completing projects.

The City and its community partners provided loans to make necessary health and safety improvements to 103 single family, LMI owner-occupied homes. The City and its CBDO partners added 5 units of new construction housing. The City provided funding for the acquisition and demolition of one blighted building to make way for a new construction affordable senior housing project. The City completed construction of 123 affordable rental units, 17 of which are designated as HOME-assisted with HOME-program specific affordability and reporting requirements. Construction is underway on an additional 60-unit HOME assisted project, of which 9 units are HOME assisted; construction and lease-up will be complete in PY2022.

Another priority in the City's 2020-24 Consolidated Plan is Economic Development. There were 5 businesses serving low/mod areas which received funding for façade improvements one of which is still in progress. Eleven LMI jobs were created (a total of 12, 1 was a non-LMI jobs) from current and previous years' assisted businesses, and 3 additional projects are underway. Again, COVID-19 has delayed some job creation, particularly for those businesses which require face-to-face contact with its customer base and those in the hospitality sector.

The City also utilized CDBG funding during the 2021 program year to assist several agencies to provide public services. These programs either provided services to areas of the City which are comprised of at least 51% LMI households or provided direct services to LMI persons. The following public service activities were assisted during the program year: Community Engagement, Block Nurse Program, Youth Employment, Pre-Court Diversion, Domestic Intervention, and housing related legal services for LMI residents;

As part of its application and funding approval process, HUD requires the City to certify that at least 70% of CDBG project funds expended will principally benefit LMI persons. The City may select a one-, two-, or three-year period for this certification; the City has selected a 3-year period. 2021 is the 2nd year and the City has expended 74.96% of its allocation on activities benefitting LMI households. The remaining funds were allocated for activities which eliminated slum and blight conditions and public improvement/public facility benefiting LMI households.

The City received \$6,061,828 in CDBG-CV funding. Funding allocated by program year end included funding for build out of a food shelf, expanded legal services, expanded meal access, Saint Paul Public Library career labs and library materials lockers, and family distance learning programming to enhance distance learning support and homework assistance.

## CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG	HOME	ESG
White	1,887	0	1,895
Black or African American	2,086	17	2,487
Asian	903	0	279
American Indian or American Native	103	0	273
Native Hawaiian or Other Pacific Islander	1	0	24
<b>Total</b>	<b>4,980</b>	<b>17</b>	<b>4,958</b>
Hispanic	733	0	517
Not Hispanic	4,771	17	4,984

Table 2 – Table of assistance to racial and ethnic populations by source of funds

### Narrative

For the program year, 108 households were assisted through CDBG funded housing activities. For these households: 46 were white, 45 were Black/African American, 27 were Asian, 1 was American Indian/Native American, and 6 identified as a mixed-race household, 5 households identified as Hispanic, and 54 were female-headed households. Totals for all CDBG funded activities are in the table above.

The City assisted 6,118 persons with ESG and ESG-CV program funding. Of those served, 1,895 were white, 2,487 were Black/African American, 279 were Asian, 273 were American Indian/Native American, 24 were Native Hawaiian/Other Pacific Islander, 543 were multiple races, and 617 declined to comment/did not know or data was not collected. Of these, 517 identified as Hispanic/Latino.



## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	7,701,217	6,038,196
HOME	public - federal	1,909,572	2,898,659
ESG	public - federal	587,816	629,234

Table 3 - Resources Made Available

### Narrative

The City had \$6,969,838 in CDBG entitlement funds and estimated \$731,379 in program income available to fund activities in the 2021 program year. The City recipted an additional \$3,422,297 in program income over what it estimated. A substantial amendment will need to be processed to allocate those additional funds before they are available. The City also had on hand CDBG funds that had been allocated during prior program years. The total expended for activities, administration and planning was \$6,038,196. There was \$5,916,917 in CDBG-CV funds available during the program year; \$1,801,599 was expended for activities, administration and planning.

The City had \$1,873,435 in current program year HOME entitlement funds, \$36,137 in program income available for activities in the 2021 program year. The City expended HOME funds that had been allocated during prior program years. The City expended a total of \$2,898,656 during the program year. Funding was used to pay for eligible expenses directly associated with administration of the HOME program and reimbursement for HOME eligible project-related expenses for 3 multi-family new construction rental properties. All funding reported as expended reflects only draws from the City's Treasury account completed during the program year, June 1, 2021 through May 31, 2022. Remaining funds will be carried over into program year 2022 and expended on projects currently under construction and those implemented in the new program year.

The City was awarded \$6,789,929 in HOME-ARP funds. The City is required to submit a HOME-ARP plan before accessing these funds. Due to staffing levels, the City had not yet begun work on the plan by the end of the 2021 program year.

The City was awarded \$587,816 in ESG funding in PY2021. The City also had on hand ESG funds that had been allocated during prior program years. The City expended a total \$629,233 of ESG funds. The City also had a balance of \$7,992,374 in previously awarded ESG-CV funding available, \$4,581,298 was expended during the program year.

**Identify the geographic distribution and location of investments**

<b>Target Area</b>	<b>Planned Percentage of Allocation</b>	<b>Actual Percentage of Allocation</b>	<b>Narrative Description</b>
Citywide	100	100	Other

**Table 4 – Identify the geographic distribution and location of investments**

**Narrative**

Funds were available citywide, to income-eligible residents. The City also provided funding to subgrantees whose programs are available to income-eligible residents residing in the subgrantee service areas. These subgrantee CDBG-eligible areas include Districts 1-8, 11, and 17. A map which shows the areas of the City with at least 51% LMI persons, referred to as CDBG-eligible block groups and census tracts and is included as Attachment C to this report. All CDBG-funded activities providing an area benefit had a service area that was located primarily in a shaded portion of the map in Attachment C.

## Leveraging

**Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.**

The City actively pursues and/or requires developers to apply for State funding including from the Minnesota Housing Finance Agency (MHFA), Minnesota State General Obligation (GO) Bonds, Metropolitan Council, and Minnesota Department of Employment and Economic Development. Private funders include foundations, banks, other lenders, and developer equity. City funding includes Housing and Redevelopment Authority (HRA) funds, Tax Increment Financing (TIF), Conduit Revenue Bonds, City sales tax (STAR) funds, and discounted City/HRA owned land. Other sources are Low-Income Housing Tax Credits, Housing Revenue Bonds, New Markets Tax Credits, Historic Tax Credits (federal and state) and Opportunity Zone equity.

In PY18, the City established a local Housing Trust Fund (HTF) to facilitate more intensive investments in housing access, affordability, stability, and quality. During the program year, working in partnership with local foundations and supportive service providers, the City provided a rent supplement program, Families First. A homebuyer assistance program was available to pay closing costs, inspection fees and down payment for LMI households.

The City's dedication to preserving healthy, affordable housing for the well-being and stability of all residents and the community is partly achieved through the 4(d) Affordable Housing Incentive Program. The City offered a property tax incentive and small cash grant for rental property owners to preserve affordability. In the program year, 63 properties were enrolled, 495 total units; 90 at 50% AMI and 405 at 60% AMI. The City continues its rental rehab program offering 0% interest loans to landlords for repairs to rental buildings provided they maintain rents affordable at 60% AMI.

The City disposed of several publicly-held parcels during the program year, of these, 1 parcel was sold to the developer of The Hollows which will result in 60 units of affordable rental housing; 5 parcels will result in affordable new construction single family homeowner units.

The City leverages its ESG funds through allocations to organizations that work collaboratively with Ramsey County Continuum of Care (CoC)-funded activities. ESG requires a dollar-for-dollar match, which was met by its subgrantees in the amount of \$546,669 for PY21, in the following ways:

- State Government funds

- Private funds
- Program Income

HUD requires all participating jurisdictions match HOME program funding spent with 25% non-federal funds. Effective April 10, 2021 HUD issued a statutory suspension to meet COVID-19-related immediate housing needs and help prevent spread of the virus - a 100% reduction in matching contributions for cities, like Saint Paul, covered by a major disaster declaration. It applies to fiscal years 2020 and 2021; HOME funds expended from October 1, 2019 through September 30, 2021. No match was earned during the program year and is summarized in Tables below.

The City ended the 2021 program year with \$54,828,264 in excess match. No additional match was earned from HOME-assisted developments. As of May 31, 2022, the City’s excess match was \$54,828,264 (see Summary - HOME Match Report).

<b>Fiscal Year Summary – HOME Match</b>	
1. Excess match from prior Federal fiscal year	54,828,264
2. Match contributed during current Federal fiscal year	0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	54,828,264
4. Match liability for current Federal fiscal year	0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	54,828,264

**Table 5 – Fiscal Year Summary - HOME Match Report**

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match

Table 6 – Match Contribution for the Federal Fiscal Year

**HOME MBE/WBE report**

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
974,398	183,084	986,391	0	171,090

Table 7 – Program Income

<b>Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period</b>						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
<b>Contracts</b>						
Dollar Amount	3,699,737	0	0	0	0	3,699,737
Number	2	0	0	0	0	2
<b>Sub-Contracts</b>						
Number	82	3	2	1	3	73
Dollar Amount	11,667,285	229,968	101,570	101,193	1,623,316	9,611,239
	Total	Women Business Enterprises	Male			
<b>Contracts</b>						
Dollar Amount	1,226,050	0	1,226,050			
Number	1	0	1			
<b>Sub-Contracts</b>						
Number	81	33	48			
Dollar Amount	11,751,071	4,531,439	7,219,632			

**Table 8 - Minority Business and Women Business Enterprises**

<b>Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted</b>						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

**Table 9 – Minority Owners of Rental Property**

<b>Relocation and Real Property Acquisition</b> – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		0	0			
Businesses Displaced		0	0			
Nonprofit Organizations Displaced		0	0			
Households Temporarily Relocated, not Displaced		0	0			
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	2	0	2	0	0	0
Cost	72,132	0	72,132	0	0	0

**Table 10 – Relocation and Real Property Acquisition**

## CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	98	125
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>98</b>	<b>125</b>

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	21	22
Number of households supported through Rehab of Existing Units	77	108
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>98</b>	<b>130</b>

Table 12 – Number of Households Supported

**Discuss the difference between goals and outcomes and problems encountered in meeting these goals.**

This program year, 17 new HOME-assisted rental units and 5 new single-family homeownership units were completed. Additionally, construction is underway on a 60-unit new construction HOME-assisted development that was funded in PY20 of which 9 units are HOME-assisted. Closings were delayed on 2 additional HOME-assisted projects due to increased construction costs resulting in additional financing gaps.



The major obstacle in meeting goals continues to be the lack of sufficient funds. With rising construction costs, production of new housing and rehabilitation of existing affordable units requires a substantial subsidy. The City must partner with other government agencies and various foundations to sufficiently finance affordable housing development projects each year. The COVID-19 pandemic and the impact on how the City conducts business created an additional barrier to committing and closing on HOME funded projects; planned developments are moving forward but there have been some delays with shifts to mostly-remote work. The Coronavirus pandemic (COVID-19) has also delayed completing projects and the pace for advancing new projects.

**Discuss how these outcomes will impact future annual action plans.**

The City will continue to budget approximately 50% of its CDBG allocation and all its HOME allocation toward the rehabilitation of existing and creation of new affordable housing units.

**Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	27	0
Low-income	42	7
Moderate-income	39	10
<b>Total</b>	<b>108</b>	<b>17</b>

**Table 13 – Number of Households Served**

**Narrative Information**

CDBG funded the rehabilitation of 108 owner-occupied housing units. Twenty-seven (27) units are occupied by households at or below 30% AMI, 42 were occupied by households with incomes from 31% to 50% AMI, and 39 were occupied by households with income from 51% to 80% AMI. Of these, 45 were female-headed households. It also provided funding for 5 new homeownership units through acquisition/rehabilitation/resale and new construction to lower income households, 2 of which were female-headed households.

The City funded and began construction in a prior year for a new affordable HOME-assisted rental development; a total of 60 units of which 9 are designated HOME units. Construction and lease-up will complete late in calendar year 2022. Some delays in construction and project advancement are related to COVID-19 and subsequent supply chain issues and rising construction costs.

\*A review of the 2021 PR-23 and cross checking with 2021 PR-03, we confirm that 108 were the 2021 actual households served/accomplishments. The discrepancy appears to come from some of our multi-year projects that had accomplishment reports in 2019 & 2020. Those numbers appear to accumulate with the 2021 reports.

## **CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)**

**Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:**

### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The City and Ramsey County receive Emergency Solutions Grant (ESG) funding through direct allocations from HUD. In order to administer the deployment of City ESG funds more efficiently, the City entered into a Joint Powers Agreement (JPA) with the County during the program year. The County administers the ESG funds; selects subrecipients and enters into contracts to implement use of funds; processes subrecipient reimbursements; monitors subrecipient performance; manages HMIS data collection and required reporting to HUD and the City. During the early days of the pandemic, street outreach service models were revised to follow public health guidance, in some cases resulting in a temporary reduction in services provided during the program year. Some service providers changed how services were provided by doing so over the phone or through virtual/remote meetings, while others modified their in-person practices with PPE and social distancing for employees and clients. Funding was awarded as follows:

**People Inc.** – Metropolitan Homeless Street Outreach Program (MHSOP) - Provided street outreach to unsheltered adults with mental illness – working directly with residents living outside or in camps. MHSOP services through street outreach were basic survival gear, benefits assistance, and assistance in stabilizing mental health symptoms. Outreach Specialists addressed housing needs and worked with Ramsey County Group Residential Housing Program (housing and services) to assist participants in securing stable housing.

**RADIAS Health (South Metro Human Services) – ACCESS Program** - Provided outreach and case management services to unsheltered adults with serious and persistent mental illness and substance abuse disorders in Ramsey County. Staff worked at shelters, Dorothy Day Center, and drop-in centers. ESG funds were also used for street outreach services in partnership with the Saint Paul Police Department program using licensed clinical social workers and housing vouchers from MHFA to provide stable housing.

**CARES Act Emergency Solutions Grant - ESG-CV** - \$7,992,924 was awarded to the City. From that award, additional funding was provided to street outreach through People, Inc. and South Metro Human Services to enhance efforts already funded through the City's annual ESG allocation, and Breaking Free was funded to provide street outreach to women and children escaping sexual exploitation, all with an emphasis on efforts to prevent, prepare for and respond to the coronavirus and those most vulnerable to the impact of the coronavirus.

Jurisdiction's Progress: Adequate funding for street outreach remains a concern and was made more

difficult by the spread of COVID-19. In response, the City's ESG funded street outreach efforts were focused on unsheltered residents, emergency shelter and rapid re-housing in response to COVID-19 during PY20. At the same time, the City, Ramsey County, and Saint Paul Foundation granted additional funds to community service providers for comprehensive street outreach to unsheltered residents sheltering in downtown skyways and on light-rail transit. Ramsey County and partners continued Safe Space with connection to supportive services and some day-time services such as limited storage lockers, showers, and coffee in the morning.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

Saint Paul addressed emergency shelter and transitional housing needs of unsheltered residents as follows:

Emergency Solutions Grant (ESG) - City ESG partially funded operational costs of emergency shelters and transitional housing services, street outreach to unsheltered residents, homelessness prevention, and Rapid Re-Housing (RRH) programs assisting residents experiencing homelessness. These funds supplemented community services financed through the Ramsey County Continuum of Care (CoC) and state-funded Family Homelessness Prevention Assistance Program (FHPAP).

**Emergency Shelter** – City ESG grant dollars partially funded operational costs of Dorothy Day Center Higher Ground (emergency shelter-adults), Family Service Center (emergency family shelter), Lutheran Social Services (LSS) Safe House (emergency youth shelter), Salvation Army Booth Brown House, (emergency youth shelter), Interfaith Action (emergency family shelter), Neighborhood House (hotel/motel voucher stays) and the Listening House Day Center (day center for homeless families). With additional support from Ramsey County, Saint Paul Foundation, and the City, Model Cities also operated an overnight shelter, Safe Space, with additional beds initially only during the coldest months but now open all year.

**Rapid Re-Housing (RRH)** - ESG partially funded Face to Face Safe Zone (RRH services for homeless youth), Theresa Living Center (homeless women and single-parent families) and YMCA of the north (homeless youth).

**Transitional Housing** - ESG partially funded operating costs for transitional housing for single-parent families at the Theresa Living Center.

**Catholic Charities** – The Dorothy Day Center Higher Ground facility provided: 280 shelter beds (including medical respite and pay-for-stay beds), and 193 permanent single room occupancy (SRO) supportive housing units. The Saint Paul Opportunity Center provided 177 permanent housing units integrated with a one-stop location to connect people with critical services to improve health, income, housing stability, and well-being.

**ESG-CV** - funded the YWCA (transitional housing for women), Face to Face (RRH services for homeless

youth), Theresa Living Center (RRH for homeless women and single-parent families), Breaking Free (RRH services for women and children escaping sexual exploitation), and Community Stabilization Project (RRH homeless families). Interfaith Action, Model Cities, Emma Norton, Catholic Charities, and Listening House received funding for emergency shelter operations.

Due to COVID-19 the number of beds available for emergency shelter decreased to ensure social distancing. Ramsey County filled in this gap by funding additional beds in alternative locations, e.g. hotels, and working with the City and social service organizations to identify alternative emergency shelter space. As the program year came to a close, emergency shelters had opened additional space within their facilities in order to maintain social distancing and continue to provide an equivalent or nearly equivalent number of beds pre-COVID-19. Ramsey County opened a separate shelter space with individual rooms for unsheltered residents experiencing COVID symptoms not severe enough to require hospitalization. City-County work group identified additional shelter space throughout the City and County.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

Ramsey County funds community programs and counseling to previously institutionalized or homeless individuals by funding nonprofit service providers that assist low-income individuals and families in the transition to permanent housing. The County and its community partners administer the primary social service networks that perform these functions and include assistance for childcare, job training, transportation, mental health counseling, chemical dependency treatment, and job search assistance.

The City's ESG Program funded homelessness prevention programs in partnership with Minnesota Community Care (in partnership with Ramsey County) – HouseCalls/Families in Crisis. Prevention services offered included, financial assistance for utility payments, rent payments, rental deposits – all necessary to secure and maintain stable housing. Ramsey County chose to shift to one prevention program due to the increase in federal and state funding during the pandemic. ESG-CV was not used for prevention services.

Saint Paul has a long history of funding supportive housing facilities, which include Crestview, Visitation, Jackson Street Village, Jeremiah Program, St. Christopher's Place; and Saint Paul Residence which continues to provide 120 supportive housing units (60 units for late stage chronic alcoholics and 60 units for formerly homeless residents including some adults who may have been discharged from publicly-funded institutions). Catholic Charities' new Dorothy Day Center Higher Ground facility provides 280 shelter beds which includes medical respite beds, pay-for-stay beds, and 193 permanent SRO supportive housing units.

Overall, the City and County worked with its community agency partners to fund programs that assist residents experiencing homelessness, including allocating CDBG funds for the Block Nurse Program and neighborhood non-profit programs that helped residents in need.

In summary, during PY21, affordable housing and supportive services were provided within the City of Saint Paul to residents experiencing homelessness and residents needing supportive housing, including the elderly, frail elderly, persons with disabilities, persons with HIV/AIDS, persons with chemical dependency, and those with limited English-speaking proficiency. That said, more affordable housing and more affordable supportive housing are needed citywide. In response, the City continues to finance affordable housing developments, and the City of Saint Paul's Comprehensive Plan includes strategies to facilitate the development of affordable housing citywide.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

In partnership with Ramsey County CoC, the City assisted adults, families, and youth experiencing homelessness with the following services:

**Homeless Adults** – Catholic Charities Higher Ground and Opportunity Center providing 177 permanent housing units integrated with a one-stop location to connect people with critical services to improve health, income, housing stability, and well-being. Saint Paul Residence provided permanent supportive housing using the Housing First model (60 units for those with late stage chronic alcoholism and 60 units for long term homeless residents) which focuses on providing permanent, affordable housing as quickly as possible and then provides the supportive services and connections to community-based supports needed for individuals/families to keep their housing.

**Homeless Families** – Homeless families were assisted with transitional housing/RRH programs through Catholic Charities, YMCA of the north (youth), and Theresa Living Center. Prevention initiatives included rental assistance, legal services, and utility assistance through Neighborhood House and WSCHS HouseCalls all of which provided supportive services to those at risk of losing their housing.

**Homeless Youth** - Recognizing that the number of emergency shelter beds/housing for homeless youth remains insufficient, the City partially financed emergency shelters, drop-in centers, and RRH services. Partners included the Salvation Army, LSS Safe House, and Face to Face Safe Zone.

**Affordable Housing** - The lack of affordable housing is often cited as a reason for homelessness. In response, Saint Paul allocated City (Housing and Redevelopment Authority and sales tax), Federal financing allocations (LIHTC and tax-exempt bonds) and HUD funds (CDBG, HOME) to construct or

preserve affordable housing. New initiatives included: established a local Housing Trust Fund; funding for community land trusts to provide new pathways to homeownership and promote long-term affordable ownership; creation of a database of NOAH units across the City to inform preservation strategies; implemented Families First, a rental supplement program with supportive services for households at/below 50% AMI and a child in St. Paul Public schools; enrolled 89 properties in the 4(d) program with property tax incentives to stabilize and preserve existing affordable housing units; and continued the rental rehab program providing loans to landlords for building improvements provided they maintain affordable rents.

The City's owner-occupied rehab program and its non-profit partners improved homeowner housing conditions. The HRA's LIHTC Qualified Allocation Plan (QAP) encourages economic integration and housing stability with production and preservation of affordable housing throughout the city. The QAP prioritizes projects that create larger, family sized housing units and projects that commit to longer periods of affordability and promotes greater access to housing by limiting security deposits and denials based on rental and credit history. An additional condition for receiving LIHTC through the HRA is developing tenant screening guidelines that implement the 2016 HUD Fair Housing Guidance related to the use of criminal history.

## **CR-30 - Public Housing 91.220(h); 91.320(j)**

### **Actions taken to address the needs of public housing**

**Public Housing and Project-Based Rental Assistance (PBRA):** Saint Paul Public Housing Agency (PHA) is an important provider of affordable housing for thousands of Saint Paul households with the greatest need (households at or below 30% of AMI). PHA owns and manages 418 public housing units and 3,836 units with Project-Based Rental Assistance (PBRA). PHA also currently administers 4,924 Housing Choice Vouchers (HCVs). In total, PHA provides over 9,000 affordable homes to more than 22,000 people.

PHA strives to provide excellent property management and maintenance for 16 hi-rises, 4 family housing developments and its 418 scattered site homes. PHA has strict but fair standards for its rental leases and prepares its vacant units to high standards for each new resident. All emergency work orders are performed within 24 hours. Routine work orders usually in less than 3 days. All apartments are inspected at least twice annually to ensure local codes and HUD standards are met. (Some routine work orders and inspections were delayed due to the COVID 19 pandemic, to protect residents and PHA staff.) PHA's excellent property management and maintenance help to maintain and improve the City's housing stock and promote neighborhood stability. PHA provides community policing (with St. Paul Police Dept) and assisted living services for frail elderly, disabled residents and others.

**Waiting Lists** – As of May 31, 2021, PHA's waiting list for the PBRA and public housing units includes 9,320 households. The waiting list is open (closed from August 2018 to September 2020). The Housing Choice Voucher (Section 8) waiting list currently includes 2,545 households. The list, closed since June 2019, is expected to reopen in 2023. PHA is accepting applicant referrals from partner agencies for special voucher categories, including VASH (Veteran Affairs Supportive Housing), FUP (Family Unification Program), Mainstream Vouchers (for non-elderly persons with a disability), and clients graduating from supportive housing service programs with project-based vouchers (Move Up).

The Annual Agency Plan for federal FY 2022 (PHA's Fiscal Year 2021, beginning April 1, 2021), Five-Year Capital Fund Plan, and Annual Report are posted at <https://www.stpha.org/>.

**Public Housing** – PHA has maintained its High Performer status under HUD's Public Housing Assessment System for 30 consecutive years. PHA does not administer HOPE VI activities or Mixed-Finance Modernization and Development. PHA has also maintained its High Performer status under HUD's Section 8 Management Assessment Program (SEMAP) for 20 consecutive years. PHA successfully implements and administers current agreements for Project-Based Vouchers (PBV); including PBV(s) in supportive housing that assists the State, Ramsey County, and the City with their plans to end homelessness.

**Rental Assistance Demonstration Conversion (RAD)** – Effective January 1, 2020, most public housing units converted, debt-free, to HUD's Project-Based Rental Assistance (PBRA) program via HUD's RAD program. The conversion does not constitute privatization of public housing; PHA continues to own, manage, maintain and improve those former public housing units through long-term PBRA contracts.

The initial 20-year contracts, by law, must be renewed; this ensures the units remain permanently affordable to low-income households. Residents continue to pay 30 percent of income towards rent and retain the same basic rights as living in PHA owned housing. The primary benefit is more predictable, reliable funding.

### **Actions taken to encourage public housing residents to become more involved in management and participate in homeownership**

The PHA encourages resident participation in management through a network of active resident organizations, including:

- Hi-Rise Presidents Council (16 Hi-Rise buildings).
- Family Residents' City-Wide Residents Council (16 members, including the 4 officers from each of the 4 family housing developments).
- Two of the 7 PHA Commissioners are residents. 1 Commissioner represents the elderly hi-rise residents and 1 Commissioner represents family residents.

PHA also supports a Resident Advisory Board (RAB) comprised of volunteer residents/participants from the public housing program and Section 8. The RAB advises PHA staff and Board on the annual updates to the Agency Plan. The draft is then released for public comment and a public hearing is held in mid-November.

During the program year, PHA Senior Management meets with the Hi-Rise Presidents Council and the Family City-Wide Residents' Council, to discuss PHA policy changes, Annual Plan, and Capital Improvements. Additionally, PHA Resident Initiatives Department and the Resident Councils work together to form new partnerships with community service agencies for the benefit of its residents.

To promote economic opportunities, PHA participates, as required and to the greatest extent feasible, with the Section 3 program – by hiring qualified PHA residents and contracting with qualified Section 3 businesses. Thanks to the PHA's Section 3 Program, public housing residents have been able to access job skills training and attend hiring fairs at PHA community centers. PHA residents are referred to Workplace Essentials training facilitated by Avivo (formerly Minnesota Resource Center). Approximately 30 PHA residents have successfully completed small business training provided by African Economic Development Solutions (AEDS). Moving forward, these graduates will have access to unlimited counseling in business development, marketing insights, general support and financial advice, leads and Sharia banking if relevant.

In the future PHA plans to revisit possible options for resident homeownership/asset preservation for the 418 housing units remaining in the public housing program.



## **Actions taken to provide assistance to troubled PHAs**

**Not applicable.** PHA has maintained its High Performer status under HUD's Public Housing Assessment System for 30 consecutive years and its High Performer status under HUD's Section 8 Management Assessment Program (SEMAP) for 20 consecutive years.

PHA has a continual need for stable Federal funding to maintain its high standards.

### **CR-30 PHA - Capital Improvements and Section 8 HCV Program - CONTINUED**

Capital Improvements PHA follows its 5-Year Capital Plan to renovate/modernize the affordable housing it owns, including the public housing units. Improvements focus on fire and life safety; also, renovations and maintenance use green sustainable designs to conserve energy and water. To preserve and improve units PHA uses PBRA operating revenues and replacement reserves, HUD Capital Fund grants, forgivable loans from MHFA's Publicly Owned Housing Program (POHP) and grants from Federal Home Loan Bank's Affordable Housing Program. Section 8 Housing Choice Voucher Program PHA fully utilized its vouchers (4,924) without exceeding authorized limits, and continued collaboration with the CoC to meet housing needs of the City's most vulnerable residents. Vouchers include 175 FUP, 288 Mainstream Program/Disability, and 241 VASH. PHA has allocated 723 project-based vouchers (PBVs); about half are in supportive housing developments that assist the City, County and State Plans to End Long-Term Homelessness. In 2018 PHA committed to project-basing up to 300 more vouchers over 5 years for mixed-income, supportive-housing for homeless using a combination of HCVs, VASH and FUP vouchers, 220 of which have been awarded. Up to 70 were offered in MHFA's 2021 Consolidated Request for Proposals.

## **CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)**

**Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)**

In PY21 the City had approximately 12,228 publicly assisted affordable housing units; 418 public housing units, 3,836 PBRA units, and 4,949 Housing Choice vouchers (HCV). Roughly 36% of City renters receive some housing assistance, yet over 50% of renters in Saint Paul are cost burdened and more than 25% of renters are severely cost burdened. The City has identified the most significant barriers to affordable housing: 1) Housing costs which continue to rise coupled with an insufficient number of housing units for all income levels and 2) median household incomes and wages not keeping pace with housing cost, especially for households with incomes at or below 50% AMI and for people of color.

In response, the City's Affordable Housing Policy requires that City-financed rental projects include affordable housing units: 10% of units affordable to households at 30% AMI; 10% affordable to households at 50% AMI; and 10% affordable to households at 60% AMI. The City's Locational Choice Policy and LIHTC program also encourage an equitable distribution of affordable housing citywide.

**Lack of Sufficient Funding for Publicly-Assisted Housing** - The lack of sufficient federal funding and LIHTC are the most substantial barriers for developing affordable housing. In general, the City continually receives less CDBG and HOME program funding. For PY21 the City received \$6,687,235 or 36% in CDBG funds of what it received in 1975 and only \$1,978,232 or 85% in HOME funds received in 2000. It is expected this trend will continue or remain steady; a similar trend is likely for LIHTCs.

**Zoning Code** – City amended its zoning code to increase housing density on high-use transportation corridors to increase housing development; the City's Zoning Code does not impose conditional use permits for supportive housing which is classified as apartments; and increasingly allows for rezoning to increase building heights; requirements for parkland dedication was reduced for affordable housing developments; Accessory Dwelling Units (ADU) are now allowed throughout the city and the City is working with a non-profit developer to build 5 affordable single family units that include an ADU; the Sustainable Building Regulations Ordinance established sustainable building regulations for buildings owned, operated or funded by the City ensuring energy efficiency and sustainability and thus lower costs for building owners and ultimately tenants; changed definition of Family to Household and from 4 unrelated adults and their children to 6 unrelated adults and their children.

**Financial Incentives** - St. Paul's Inspiring Communities program provides homebuyer assistance of up to \$5,000 for households under 80% AMI and \$2,500 for incomes over 80% AMI to purchase single-family homes constructed on vacant lots sold to developers and subsidized by the HRA. A new homebuyer assistance program provides up to \$40,000 for downpayment, inspections, closing costs for LMI buyers.

During PY21 the City/HRA provided funding to 103 low income homeowners to bring their property up to current property standards and preserve homeownership. An additional 5 new construction homes were sold to income qualifying borrowers and 3 additional units are under construction.

**Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)**

There is no single strategy or program that can solve the City's housing crisis. The City is dedicated to creative, collaborative and thoughtful approaches that deepen and widen investment across the entire City of Saint Paul.

Affordable rental housing and affordable homeownership remain underserved needs. During PY21, the City and its subrecipients addressed many underserved needs through its ongoing, multi-year HUD funded housing programs using CDBG, HOME, state and local funds, and LIHTC. Funds were used for programs to develop affordable rental and home-ownership units. The City's homeownership programs (home-improvement deferred loans, Mortgage Foreclosure Prevention Program, and affordable production program) stabilized households. The City participated with the Minnesota Home Ownership Center's (MNHOC) Home Ownership Opportunity Alliance to develop strategies to decrease the disparities in homeownership and increase homeownership within communities of color. Finally, the City also partnered with CDCs to develop and rehabilitate housing citywide, a total of 108 households were served.

New City initiatives - established a local Housing Trust Fund to facilitate more intensive investments in housing access, affordability, stability, and quality. During the program year, working in partnership with local foundations, the City established a rent supplement program, Families First, to provide families a \$300 monthly rent supplement and ongoing supportive services to LMI households for up to 3 years in select Saint Paul schools. Households must meet income and rental limits, based on household size, and not be receiving other significant housing assistance such as public housing or a Section 8 voucher. Through the 4(d) Affordable Housing Incentive Program exhibits the City offers property tax incentives for rental property owners to preserve affordability. In the program year, 63 properties were enrolled, 495 total units; 18% were at 50% AMI, the rest at 60% AMI.

Through the HRA Housing Trust Fund a Community Land Trust (CLT) project was developed. It provides a flexible financial tool to address the current housing affordability crisis in Saint Paul. The homebuyer purchases the home and land ownership is retained by the CLT. Long-term affordability is created by using a long-term ground lease.

In early 2021, the City accepted a direct allocation of Emergency Rental Assistance funds to provide assistance to renter households that had experienced or were at risk of financial hardship due to the COVID-19 pandemic. Households provided assistance were at/below 80% AMI, experiencing homelessness or financial instability or at risk for either. Priority was given to households at/below 50% AMI and those unemployed for at least 90 days. In addition the City used its CDBG-CV Cares Act funds to contract with 5 community organizations to ensure its traditionally underserved communities had

access to the ERA funds.

Housing Services for Underserved Residents - ESG funds were allocated for emergency shelters (homeless individuals, families, and youth), and rapid re-housing programs (assisting homeless adults, youth, and families move from shelters to permanent housing). Catholic Charities' High Ground and Phase II Opportunity Center helped ease the continued need for emergency shelter space and permanent supportive housing and provided an integrated one-stop location connecting people to critical health and community services and housing. Catholic Charities continued to operate Saint Paul Residence which has 120 supportive housing units including 60 housing units for residents with late stage chronic alcoholism. Ramsey County, using ESG Cares Act dollars increased the number of shelter beds available. The City and the County also worked with community agencies to respond to the needs of new Americans, refugees, and persons with limited English proficiency (LEP).

**Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)**

The problem of lead-based paint (LBP) hazards remains a major concern for the City due to the large number of older housing units. The City continued to comply with all LBP regulations. The City provided information on LBP hazards to households utilizing federal funds for housing activities, i.e. purchasing a home or receiving housing rehabilitation services, during the 2021 program year. All City housing programs include adequate funding to address LBP, and the City works in conjunction with health officials and other agencies to address the issue. The City has enhanced its documentation requirements of Lead Certified contractors to ensure all employees are aware of and complying with lead safe work practices.

**Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)**

During PY21, the City partnered with youth workforce activities and other related public service activities which complement programs provided by Ramsey County, the primary social service provider in Saint Paul. Workforce activities included outreach, basic skills and job training, job placement, and follow-up employment services.

The City offered summer employment to Saint Paul youth ages 14 to 21 from low-income families and/or with a barrier to employment. The program is a pipeline for youth career development and building a diverse future workforce. The City, Saint Paul Public Schools, Saint Paul Area Chamber of Commerce, local businesses, foundations and community-based organizations team up to provide employment opportunities and help build professional skillsets for Saint Paul youth.

The City opened CareerLabs at 5 of its libraries to provide opportunities for accessible workforce support and services, career lab access, and virtual training locations for Saint Paul residents impacted by COVID-19, services include digital literacy supports, increased access to employment support/services and increasing and improving virtual training opportunities. In 2021, Career Lab staff provided 2,675 individual help sessions. From January-June 2022, staff provided 1,571 help sessions. Drop-in Tech Help

hours were added at four locations and will be delivering basic computer classes in Fall 2022.

The City's CERT Program (business certification program for M/W/SBE), Vendor Outreach Program (VOP), and Section 3 programs provide economic opportunities to businesses and individuals who have historically lacked equitable access to public contracting opportunities. VOP encourages economic opportunities for minority- and women-owned and small businesses. The Section 3 Program promoted local economic development by requiring that when employment or contracting opportunities are generated on HUD-funded construction projects, preference must be given to low-income persons or businesses residing in the community where the project is located. The City continues to work with vendors to ensure Section 3 businesses and residents are notified and utilized in local public contracting opportunities. Residents can register in Spanish for the Section 3 program. The City hosted monthly workshops to help businesses certify and access resources. These workshops offered M/W/SBE and Section 3 businesses an opportunity to complete a CERT and Section 3 application, register with City Procurement, meet with volunteer business mentors, attorneys and City licensing officials. CERT also partners with Wells Fargo and the Federal Reserve Bank to host workshops for W/M/SBE and Section 3 businesses to help them access capital.

People's Prosperity Guaranteed Income Pilot was launched spring of 2021. It provides up to 150 Saint Paul families with \$500 per month in guaranteed income for up to 18 months. Participants were randomly selected from families participating in the CollegeBound Saint Paul program, the City's college savings initiative which provides every child born to a Saint Paul resident with a college savings account seed deposit of \$50. Families can contribute to the fund. The program is sustained with funding from the City, the State, foundations, corporations and individual donors. The goal: get cash to families in the community with no strings attached – families know best what they need.

In late 2018, Saint Paul signed into law a citywide minimum wage ordinance. Beginning in 2020, the minimum wage for macro businesses, 10,001+ employees and City employees, is \$12.50 and increases to a full \$15 by July 1, 2022. Smaller businesses began July 1, 2020, and go up in small increments, depending on the number of employees, through July 1, 2025, when the minimum wage will be the City rate for all businesses.

### **CR-35 Other Actions - Additional Actions to Reduce the Number of Poverty Level Families**

**Municipal Fines and Fees** National League of Cities (NLC) has selected Saint Paul to participate in its Cities Addressing Fines and Fees Equitably (CAFFE) six-city technical assistance initiative designed to help cities assess and reform their use of local fines and fees and develop equitable collections strategies. Cities will assess fines and fee structures within at least one of their municipal collections entities; learn new ways to reduce inequities in how fines and fees are imposed; and make program or policy changes that lead to a new collections model for the city, connecting residents in debt with services that improve their financial health. The study outcomes pending. Job fairs were held virtually with the City and County several times during the year. Held in partnership with Ramsey County Workforce Solutions, Chambers of Commerce and other community partners, job fairs focused on specific employers and/or

employment sectors. Held separately, but enhancing the impact of job fairs, are Community Power-Up meetings, held virtually and typically monthly and provided citizens with opportunities to clear criminal record and erase an evictions, receive practical education on work, finances, legal issues and housing issues. Other opportunities include Full Stack and MSP Tech Hire who work to find best in class vendors that provide tech training and bootcamps, then provides scholarships to low income residents and under-represented residents (BIPOC, women, and those with a disability) to attend at little to no cost. Orgs we partner with here include Prime Digital Academy, Software Guild, and IT Ready. We work with Ramsey County Workforce Solutions to screen and vet for other public assistance. We also launched a new youth focused cohort with Right Track last year. We've presented stats at recent HRA meetings and could dig up. <https://www.stpaul.gov/businesses/open-business/full-stack-saint-paul/msp-techhire> Full Stack is also sponsoring multiple events each year with partners working to provide access to tech and innovation related training, careers, networking, and entrepreneurial growth. Examples include Code Switch, Hack the Gap, and Lunar Startups. Family Distance Learning, Library Career Labs, enhanced Mobile library services, and expanded legal services.

### **Actions taken to develop institutional structure. 91.220(k); 91.320(j)**

Saint Paul's institutional structure created opportunities for the City to partner with many organizations. During PY21, the City collaborated with other government partners - Federal, State, and County, non-profit organizations, and housing developers to implement housing, economic development, and community development activities.

The City, through its ESG funding, participated with the CoC and community agencies, such as Catholic Charities and the YWCA Saint Paul, to provide support to unsheltered residents and Coordinated Access, which required substantial local funding. During PY21 the City also partnered with a variety of subgrantees to assist those experiencing homelessness and those at risk of becoming homeless, including underserved populations such as new Americans, those with limited English proficiency, seniors, youth, and homeless Veterans.

During PY21, Saint Paul residents were also empowered by City's institutional structures, such as the City's Central CERT Program, VOP, and Section 3 program - all of which provide economic opportunities to businesses and individuals who have historically lacked equitable access to public contracting opportunities. City's Section 3 Program ensured that Section 3 businesses and residents were notified and utilized in local public contracting opportunities. These City compliance programs, in conjunction with the all the City's investments in housing, business growth, and infrastructure, all better connect Saint Paul residents and its businesses to opportunities within Saint Paul and throughout the region.

Also related to economic development the City's Open for Business initiative provided guidance and resources to assist existing and start-up businesses to start, grow, and thrive in Saint Paul and the Full Stack program spurs business innovation and supports technology and innovation sector businesses to start up and scale up.

In 2021, the community services department at Saint Paul Public Library (SPPL) provided 137 virtual digital literacy classes in Spanish in partnership with CLUES. These classes have continued in 2022, and are now provided three times a week, and community services measures student outcomes with the Northstar Digital Literacy assessment, measuring students' grasp of various concepts like email and internet basics. SPPL partnered with Ramsey County Workforce Solutions and the Ramsey County Library to distribute 500 hotspots for long term loan through the Emergency Connectivity Fund. SPPL's digital navigators assisted patrons with set up and skill-building through this initiative. This initiative lasted from 11/21-6/30/22, and we are awaiting word on further device and hotspot loan, to assist patrons in accomplishing goals both daily and long term, and in connecting with the library's digital resources. SPPL is also piloting a more robust digital navigator program, to assist patrons with internet sign up, device access, and skill-building. This program began in October of 2021, and will continue in pilot phase through September of 2022. Outputs measured include the number of people connected with internet access, devices, and skill building opportunities. From the beginning of the program through the end of May, digital navigators reported 900 interactions with patrons and 500 internet connections enabled. The library, the city, and Ramsey county are partners in the connectivity blueprint, a community engagement initiative with partners across the city and county, including multiple school districts, the chamber of commerce, and St. Paul College. The connectivity blueprint seeks to establish an understanding of Ramsey County residents' experiences with digital inequity, to guide future policy and investments.

### **Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)**

During PY21, Saint Paul encouraged the coordination between social service agencies and housing providers. Ramsey County is the primary funding source for social services for Saint Paul residents. The Saint Paul Public Housing Agency (PHA) is the primary housing provider for households at or below 30% AMI.

The City participated with the CoC Governing Board which coordinated social services that assisted homeless residents and those at risk of losing their housing within Saint Paul and Ramsey County. More directly, the City's ESG and ESG-CV each partially funded 13 community agencies to provide essential services, homeless prevention, emergency shelters, and rapid re-housing.

An additional working partnership is the HouseCalls Program (a collaboration of City, Ramsey County Public Health and WCHS's Health Care for the Homeless) which recognized that preventing homelessness directly impacts family health and ultimately community health. HouseCalls collaborated with the City's Department of Safety and Inspections (DSI) to assist residents at-risk of being homeless because their homes were declared unfit for human habitation.

Dorothy Day Center Higher Ground Opportunity Center provides 177 permanent housing units integrated with a one-stop location to connect people with critical services to improve health, income, housing stability, and well-being.

CDBG-CV funds were allocated to non-profit community service organizations to provide emergency rental assistance navigation to serve those hardest to reach (LEP residents) to apply for rental and utility assistance as well as working with landlords to assist their tenants to apply for assistance. These services will help those affected by COVID-19 retain their housing and provide rental income for landlords.

The City worked with CDCs, non-profit organizations, and the private sector to provide housing, economic development, community development, and public services. In partnership with financial institutions, the City's Economic Development programs provided gap financing supporting business and job growth. This coordination maximized the amount of non-HUD funds invested in these projects. Finally, the City's Section 3 Program increased low-income resident employment and low-income business inclusion on City-funded construction projects.

### **Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)**

During PY21, the City used its housing policy and housing practices to develop actions to affirmatively further fair housing (AFFH).

The City continues to operationalize its Housing Trust Fund (HTF) strategies which serve as flexible financial tools to address the current crisis of housing affordability in Saint Paul. Current issues within the Saint Paul housing market include increasing costs of labor and materials limiting new construction, housing costs rising faster than average incomes, and significant disparities in homeownership.

HTF strategy objectives are to meet the needs of those with the lowest incomes by increasing supply; invest in low- and moderate-income residents by investing in the existing housing supply to retain housing options and limit displacement; explore new approaches to meet housing needs; build wealth for residents and communities; and promote fair access to housing for all City residents.

As a contributing member of the Fair Housing Implementation Council (FHIC), the City worked with regional partners and contracted with the Lawyers Committee for Civil Rights Under Law to draft the 2020 AI. The 2020 AI was finalized by the FHIC and The Lawyers Committee for Civil Rights Under Law on January 21, 2021. During the process of drafting the 2020 AI the Preserving Community and Neighborhood Choice Rule was published and adopted. It is the City's understanding there is no longer a formal regulatory or compliance requirement to submit this plan; the FHIC submitted the Final AI to the local HUD field office for feedback.

The following goals were identified in the 2020 Analysis of Impediments:

***Goal 1: Increase the supply of affordable housing in high opportunity areas.***

***Goal 2: Preserve the existing stock of affordable rental housing.***



**Goal 3:** *Support homeownership for households of color.*

**Goal 4:** *Prevent Displacement of Black and Brown low- and moderate-income residents.*

**Goal 5:** *Increase community integration for person with disabilities.*

**Goal 6:** *Ensure equal access to housing for person with protected characteristics, lower-income, and homeless.*

**Goal 7:** *Expand access to opportunity for protected classes.*

**Goal 8:** *Reduce barriers to mobility.*

The FHIC is currently working to identify and prioritize the goals and strategies within the 2020 AI to be addressed as a region. The City will continue to work towards understanding the impediments and operationalizing the goals identified in this AI through coordination with the FHIC and within the City's jurisdiction. Additional information on actions to Affirmatively Further Fair Housing may be found in Attachment B.

## **CR-40 - Monitoring 91.220 and 91.230**

**Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

The City's Grants Management division of the Planning and Economic Development (PED) department served as the City's overall grant administrator ensuring compliance with all pertinent CDBG, HOME, and ESG program regulations and requirements. In PY21, the City utilized an outside consultant to assist with monitoring its CDBG subgrantees, and to ensure that HOME-assisted units met rent, occupancy, income, and property standards requirements of the HOME program through the property's affordability period. The City's outside consultant also provides on-going compliance training for property managers and owners of properties it monitors. The outside consultant also monitored the City's ESG program in PY2021

Staff consults the CPD Monitoring Handbook before conducting a compliance review. Risk rating is conducted prior to funding and to determine monitoring frequency and technical assistance needs for each subgrantee and City-administered program. Additionally, all requests for financial assistance included a review of conformance with the Consolidated Plan prior to consideration for and approval of funding.

Compliance monitoring consisted of:

- Reviewing reports and supporting documents submitted by subgrantees and in-house programs for cost reimbursement;
- Performing on-site and/or desk monitoring reviews at subgrantees and in-house locations; and,
- Observing the delivery of services that benefit eligible program participants.

The City monitors contract compliance for labor standards and Section 3 through LCPtracker. The Central Certification (CERT) program is a small business certification program that certifies Minority-Owned Business Enterprise (MBE), Women-Owned Business Enterprise (WBE), and Small Business Enterprise (SBE) and is recognized by Hennepin County, Ramsey County, and the City of Saint Paul. The Vendor Outreach Program (VOP) sets goals for purchasing from certified WBEs, MBEs and SBEs in a variety of products and service categories. The City monitors contract compliance for the VOP through the B2Gnow system. The system audits projects monthly to confirm payments to subcontractors. Staff members from the Department of Human Rights and Equal Employment Opportunity (HREEO) monitor all compliance.

## **Citizen Participation Plan 91.105(d); 91.115(d)**

### **Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.**

The City published a legal notice on August 5, 2022, in the *The Pioneer Press*, Saint Paul City Council's designated legal newspaper of general circulation, advertising the availability of the draft PY21 CAPER, providing notice of the 15-day comment period, and notice of public hearing. The public hearing will be held via Teams on August 16, 2022, at 2:00 p.m. and also simultaneously in-person at 25 West 4th Street Suite 1300, Saint Paul, MN to accommodate a variety of members of the public. In-person meetings, or meetings conducted under Minn. Stat. § 13D.02 for the City of Saint Paul Department of Planning and Economic Development (PED), may not be practical or prudent for all members of the public due to the COVID-19 health pandemic. However, some members of the public prefer and have better access to centrally located in-person meetings. Members of the public are also able to provide public comment on the City's CAPER by calling the numbers listed in the public notice, via e-mail, or U.S. Postal Service mail. A hard copy of the draft CAPER was made available at the Saint Paul Public Library Bookmobile and posters were prominently displayed at all Saint Paul public libraries and the bookmobile inviting City residents to provide public comment. Each library and the bookmobile were provided with instructions for residents to access the draft CAPER on the City's website.

All public comments received or post-marked by the end of the public comment period, August 23, 2022, will be considered.

The public hearing notice includes language that requests for accommodation will be made and includes contact information for accommodation in English, Hmong, Spanish, and Somali – the most prevalent languages in St. Paul. Language interpretation services are available in all City departments. Additionally, the City's webpages are translatable and ADA compliant.

The City will also send a notice through the City's Early Notification System (ENS) to all direct subscribers and to all District Council Offices (17 in total). District Councils represent the entire City and provide opportunities for all residents to learn about and provide input on what is happening in their neighborhoods and citywide. ENS notification to District Councils request that each Council inform their constituents of the availability of the report and public hearing date.

The City's Citizen Participation Process is included as attachment E.

Publish date: August 5th, 2022

Public Hearing date: August 16, 2022

Public comment period: August 8 - August 23, 2022

No public comments were received.

## **CR-45 - CDBG 91.520(c)**

**Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

The COVID-19 pandemic continued to impact all aspects of programming during PY21. Federal Register Notice FR-6218-N-01 allowed CDBG grantees to incorporate waivers and alternative requirements into the administration of 2019 and 2020 CDBG program years. Any new activities were vetted for compliance with eligibility and national objective and were still subject to the requirements of environmental review, labor, and fair housing. Any activities that were amended to take advantage of COVID-19 waivers must assist the City to prevent, prepare for, and respond to the coronavirus.

The City received a total of \$6,061,828, in two separate allocations, of CDBG-CV funding under the CARES Act. Funding was committed to emergency rental assistance navigators, expanded legal services, emergency meal support and access to meals, enhancements to Saint Paul Public Library career labs and the addition of lockers for library materials pickup, and family distance learning programs. Despite the City making concerted efforts towards achieving the strategic plan goals articulated in the Consolidated Plan in PY 2020, most of the CDBG-CV funding carried into PY2021. An additional substantial amendment was made to the 2020 annual action plan during PY2021 in response to the end of the foreclosure moratorium:

Substantial Amendment No. 6: Simultaneously with the 2019 Substantial Amendment No. 10, this substantial amendment will move CDBG in the amount of \$843,000 from Planning and Administration (Project 12) to create a new project CV Expanded Public Services (Project 13) to fund a new activity - the Saint Paul Homeowner Stability Mortgage Assistance Program.

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

No

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**

## **CR-50 - HOME 91.520(d)**

### **Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations**

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

During the 2021 program year the City utilized an outside consultant, Affordable Housing Connections, Inc. (AHC), to monitor its HOME-assisted units ensuring all units met rent, occupancy, income, and property standards requirements of the HOME program through the property's affordability period. See the attached Summary Report provided by AHC, Attachment D.

In PY21, 43 annual reports were reviewed and 174 HOME units were inspected and tenant files were reviewed. Where applicable, all review concerns related to the tenant files have been clarified and/or resolved. No deficiencies affected households' income eligibility or units' rent compliance. There were instances of "Sufficient but Imperfect" findings. Owner/Management have been advised to correct or improve procedures to assure compliance in the future. One property has an open site compliance finding. Work is to be completed by Aug 31, 2022.

If a HOME-assisted property is not in compliance during the affordability period, the City's third-party HOME compliance contractor, Affordable Housing Connections, Inc. (AHC), works directly with the property owner/property management company to bring the property into compliance. If an owner does make appropriate changes, the matter is referred to the City. The City would then work directly with the property owner to ensure compliance with all HOME regulations.

All requests for rent increases for HOME-assisted must be submitted to AHC. AHC reviews requests to ensure proposed rent increases and applicable utility allowances are within the HOME program limits. Requests are then submitted to the City, with a recommendation to approve or deny, for final review and approval by City Grants Management staff.

### **Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)**

Proposals for HOME funding are accepted throughout the year, and affirmative marketing is required (the Minnesota Housing Finance Agency (MHFA) Fair Housing Marketing Plan is used).

Turnover is very low in HOME-assisted units and about 90% of the projects are maintaining waiting lists. Most of the projects also work with referrals from a wide variety of social service and government agencies, which serve to promote diversity through each entity's outreach.

For projects with Affordable Fair Housing Marketing Plans (AFHMPs) that are more than 5 years old, the City recommended that project owners review marketing activities and adjust, if necessary, to attract a higher percentage of applicants who meet the demographic characteristics outlined in their plans.

**Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics**

Program income was aggregated through March 15, 2021, for use in program year 2021, in the amount of \$11,993.00. The aggregated program income was utilized for project costs associated with an 82-unit new construction rental project, 8 units of which were HOME assisted; 2 for households with income at or below 50% AMI and 6 for households with income at or below 60% AMI. Construction began in program year 2020 and was completed in program year 2021 or early 2022. Program income received March 15, 2021 through March 15, 2022, will be aggregated and used for administrative and project costs in program year 2022.

**Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)**

The City works with other funding entities, CDCs, and developers to assess development opportunities, unmet community needs, and funding options. Communications are pro-active, and the City invites engagement with entities who have interest in local project development through communication tools such as the City website and social media accounts, media outreach, and frequent community engagement. The City strongly encourages pre-development interaction and planning. As a Tax Credit Sub-allocator, the City works closely with MHFA tax credit proposals in assessing the resources available.

## CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

<b>Total Labor Hours</b>	<b>CDBG</b>	<b>HOME</b>	<b>ESG</b>	<b>HOPWA</b>	<b>HTF</b>
Total Number of Activities	2	0	0	0	0
Total Labor Hours	0	0	0		
Total Section 3 Worker Hours	0	0	0		
Total Targeted Section 3 Worker Hours	0	0	0		

**Table 14 – Total Labor Hours**

<b>Qualitative Efforts - Number of Activities by Program</b>	<b>CDBG</b>	<b>HOME</b>	<b>ESG</b>	<b>HOPWA</b>	<b>HTF</b>
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	5	5	5		
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	5	5	5		
Direct, on-the job training (including apprenticeships).	66	66	66		
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	66	66	66		
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	5	5	5		
Outreach efforts to identify and secure bids from Section 3 business concerns.	41	41	41		
Technical assistance to help Section 3 business concerns understand and bid on contracts.	41	41	41		
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	22	22	22		
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	66	66	66		
Held one or more job fairs.	0	0	0		
Provided or connected residents with supportive services that can provide direct services or referrals.	225	225	225		
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	225	225	225		
Assisted residents with finding child care.	0	0	0		
Assisted residents to apply for, or attend community college or a four year educational institution.	0	0	0		
Assisted residents to apply for, or attend vocational/technical training.	0	0	0		
Assisted residents to obtain financial literacy training and/or coaching.	225	225	225		
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	225	225	225		
Provided or connected residents with training on computer use or online technologies.	0	0	0		
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	225	225	225		
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0	0	0		

Other.	0	0	0		
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**Table 15 – Qualitative Efforts - Number of Activities by Program**

**Narrative**

The Housing and Urban Development (HUD) Section 3 program requires that opportunities generated by HUD financial assistance be directed to low-income families and individuals, particularly those who are recipients of public housing and other government assistance. Section 3 also benefits businesses that employ and train local low-income residents. The City is committed to working with local vendors, community partners, and other local government agencies to ensure Section 3 continues to benefit local and low-income businesses and workers.

For this reporting cycle, we have two projects with a combined \$957,000 of CDBG funding, and a total development cost of \$4,143,171.

**CR-60 - ESG 91.520(g) (ESG Recipients only)**

**ESG Supplement to the CAPER in *e-snaps***

**For Paperwork Reduction Act**

**1. Recipient Information—All Recipients Complete**

**Basic Grant Information**

**Recipient Name** ST. PAUL  
**Organizational DUNS Number** 961663390  
**UEI**  
**EIN/TIN Number** 416005521  
**Identify the Field Office** MINNEAPOLIS  
**Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance** Saint Paul/Ramsey County CoC

**ESG Contact Name**

**Prefix** Ms  
**First Name** Beth  
**Middle Name** A  
**Last Name** Hubler-Ulrich  
**Suffix**  
**Title** Grants Manager



**ESG Contact Address**

**Street Address 1** 25 West 4th Street  
**Street Address 2** Suite 1100  
**City** Saint Paul  
**State** MN  
**ZIP Code** 55102-  
**Phone Number** 6512666689  
**Extension**  
**Fax Number**  
**Email Address** beth.ulrich@ci.stpaul.mn.us

**ESG Secondary Contact**

**Prefix** Ms  
**First Name** Austria  
**Last Name** Zahar Castillo  
**Suffix**  
**Title** Grants Specialist  
**Phone Number** 6512666691  
**Extension**  
**Email Address** austria.castillo@ci.stpaul.mn.us

**2. Reporting Period—All Recipients Complete**

**Program Year Start Date** 06/01/2021  
**Program Year End Date** 05/31/2022

**3a. Subrecipient Form – Complete one form for each subrecipient**

**Subrecipient or Contractor Name:** ST. PAUL  
**City:** ST. PAUL  
**State:** MN  
**Zip Code:** 55102,  
**DUNS Number:** 961663390  
**UEI:**  
**Is subrecipient a victim services provider:** N  
**Subrecipient Organization Type:** Unit of Government  
**ESG Subgrant or Contract Award Amount:** 0

**Subrecipient or Contractor Name:** Catholic Charities of the Archdiocese of St. Paul and Minneapolis  
**City:** Minneapolis  
**State:** MN  
**Zip Code:** 55403, 2513  
**DUNS Number:** 108504168  
**UEI:**  
**Is subrecipient a victim services provider:** N  
**Subrecipient Organization Type:** Faith-Based Organization  
**ESG Subgrant or Contract Award Amount:** 115000

**Subrecipient or Contractor Name:** Breaking Free, Inc.  
**City:** St. Paul  
**State:** MN  
**Zip Code:** 55104,  
**DUNS Number:** 015890965  
**UEI:**  
**Is subrecipient a victim services provider:** Y  
**Subrecipient Organization Type:** Other Non-Profit Organization  
**ESG Subgrant or Contract Award Amount:** 57632

**Subrecipient or Contractor Name:** Face to Face Health & Counseling  
**City:** St. Paul  
**State:** MN  
**Zip Code:** 55102,  
**DUNS Number:** 030014575  
**UEI:**  
**Is subrecipient a victim services provider:** N  
**Subrecipient Organization Type:** Other Non-Profit Organization  
**ESG Subgrant or Contract Award Amount:** 86550

**Subrecipient or Contractor Name:** Theresa Living Center  
**City:** St. Paul  
**State:** MN  
**Zip Code:** 55106,  
**DUNS Number:** 966111205  
**UEI:**  
**Is subrecipient a victim services provider:** N  
**Subrecipient Organization Type:** Other Non-Profit Organization  
**ESG Subgrant or Contract Award Amount:** 45000

**Subrecipient or Contractor Name:** West Side Community Health Services

**City:** St. Paul

**State:** MN

**Zip Code:** 55107,

**DUNS Number:** 135938926

**UEI:**

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 18000

**Subrecipient or Contractor Name:** RAMSEY COUNTY, MN

**City:** Saint Paul

**State:** MN

**Zip Code:** 55102, 1635

**DUNS Number:** 010354488

**UEI:**

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Unit of Government

**ESG Subgrant or Contract Award Amount:** 41147

**Subrecipient or Contractor Name:** Neighborhood House-ES Family Ctr

**City:** St. Paul

**State:** MN

**Zip Code:** ,

**DUNS Number:** 091721704

**UEI:**

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 18662

**Subrecipient or Contractor Name:** People, Inc.

**City:** Saint Paul

**State:** MN

**Zip Code:** 55120, 1271

**DUNS Number:** 071511356

**UEI:**

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 5000

**Subrecipient or Contractor Name:** Interfaith Action of Greater Saint Paul

**City:** Saint Paul

**State:** MN

**Zip Code:** 55105, 1815

**DUNS Number:** 138618165

**UEI:**

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Faith-Based Organization

**ESG Subgrant or Contract Award Amount:** 64098

**Subrecipient or Contractor Name:** lutheran social services

**City:** Saint Paul

**State:** MN

**Zip Code:** 55104, 6104

**DUNS Number:** 079728721

**UEI:**

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 21075

**Subrecipient or Contractor Name:** South metro Human Services

**City:** Saint Paul

**State:** MO

**Zip Code:** 55101, 1421

**DUNS Number:** 800168338

**UEI:**

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 5000

**Subrecipient or Contractor Name:** Institute For Community Alliances, IA

**City:** Des Moines

**State:** IA

**Zip Code:** 50314, 2510

**DUNS Number:** 149341732

**UEI:**

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 11757

**Subrecipient or Contractor Name:** Listening House

**City:** Saint Paul

**State:** MN

**Zip Code:** 55106, 4428

**DUNS Number:** 969721112

**UEI:**

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 38840

**Subrecipient or Contractor Name:** Salvation Army

**City:** Saint Paul

**State:** MN

**Zip Code:** 55108, 2542

**DUNS Number:** 082719084

**UEI:**

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Faith-Based Organization

**ESG Subgrant or Contract Award Amount:** 20000

**Subrecipient or Contractor Name:** YMCA Greater Twin Cities

**City:** Minneapolis

**State:** MN

**Zip Code:** 55402, 1609

**DUNS Number:** 020496519

**UEI:**

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 40055

## CR-65 - Persons Assisted

### 4. Persons Served

#### 4a. Complete for Homelessness Prevention Activities

Number of Persons in Households	Total
Adults	40
Children	21
Don't Know/Refused/Other	0
Missing Information	0
<b>Total</b>	<b>61</b>

Table 16 – Household Information for Homeless Prevention Activities

#### 4b. Complete for Rapid Re-Housing Activities

Number of Persons in Households	Total
Adults	81
Children	86
Don't Know/Refused/Other	0
Missing Information	0
<b>Total</b>	<b>167</b>

Table 17 – Household Information for Rapid Re-Housing Activities

#### 4c. Complete for Shelter

Number of Persons in Households	Total
Adults	4,808
Children	539
Don't Know/Refused/Other	2
Missing Information	48
<b>Total</b>	<b>5,397</b>

Table 18 – Shelter Information

#### 4d. Street Outreach

Number of Persons in Households	Total
Adults	476
Children	8
Don't Know/Refused/Other	2
Missing Information	7
<b>Total</b>	<b>493</b>

Table 19 – Household Information for Street Outreach

#### 4e. Totals for all Persons Served with ESG

Number of Persons in Households	Total
Adults	5,405
Children	654
Don't Know/Refused/Other	4
Missing Information	55
<b>Total</b>	<b>6,118</b>

Table 20 – Household Information for Persons Served with ESG

#### 5. Gender—Complete for All Activities

	Total
Male	3,643
Female	2,004
Transgender	48
Don't Know/Refused/Other	27
Missing Information	394
<b>Total</b>	<b>6,116</b>

Table 21 – Gender Information

## 6. Age—Complete for All Activities

	<b>Total</b>
Under 18	653
18-24	593
25 and over	4,812
Don't Know/Refused/Other	3
Missing Information	57
<b>Total</b>	<b>6,118</b>

Table 22 – Age Information

## 7. Special Populations Served—Complete for All Activities

### Number of Persons in Households

<b>Subpopulation</b>	<b>Total</b>	<b>Total Persons Served – Prevention</b>	<b>Total Persons Served – RRH</b>	<b>Total Persons Served in Emergency Shelters</b>
Veterans	218	0	0	218
Victims of Domestic Violence	1,481	14	50	1,417
Elderly	350	6	0	344
HIV/AIDS	29	0	0	29
Chronically Homeless	2,160	0	16	2,143
<b>Persons with Disabilities:</b>				
Severely Mentally Ill	2,051	15	34	2,002
Chronic Substance Abuse	2,835	2	2	2,831
Other Disability	1,112	9	11	1,092
Total (Unduplicated if possible)	10,236	47	113	10,076

Table 23 – Special Population Served



## CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes

### 10. Shelter Utilization

Number of New Units - Rehabbed	0
Number of New Units - Conversion	0
Total Number of bed-nights available	191,260
Total Number of bed-nights provided	191,260
Capacity Utilization	100.00%

Table 24 – Shelter Capacity

### 11. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

The City and Ramsey County receive Emergency Solutions Grant (ESG) funding through direct allocations from HUD. To administer City ESG funds more efficiently, the City entered into a Joint Powers Agreement (UPA) with the County. The County administers City ESG and ESG-CV funds; selects subrecipients and enters into contracts to implement use of funds; processes subrecipient reimbursements; monitors subrecipient performance; manages HMIS data collection and required reporting to HUD and City.

Through the JPA, the County administered City ESG/ESG-CV funds were provided to 11 community agencies to support emergency shelter operations and support services and RRH programs. Support services included case management, legal services, and transportation to emergency shelters. Also funded, through an additional 4 community agencies, was street outreach and HMIS data collection. Priorities for City ESG/ESG-CV is to support agencies and community services that work with and support Coe efforts to end homelessness in Saint Paul.

City and ESG/ESG-CV-funded community agencies assist unsheltered residents and those at risk of losing their housing. For single adults, Catholic Charities Dorothy Day Higher Ground provides emergency overnight shelter, pay-for-stay temporary housing, respite care, and permanent supportive housing along with supportive services - such as mental health counseling, during the day. Catholic Charities' Family Service Center provides emergency family shelter for up to 120 days - allowing time for families to seek more permanent housing. The Salvation Army Booth Brown House and Lutheran Social Services Safe House provide emergency shelter services for homeless youth. Interfaith Action of St. Paul and Model Cities provide supportive housing and services for families and individuals, and Listening House provides a day shelter and supportive services.

With additional support from Ramsey County and Saint Paul Foundation, the City continues Safe Space, overnight shelter, open all year with extended hours and services. For longer-term supportive housing, four agencies provided Rapid Re-Housing (RRH): Theresa Living Center for homeless women and single-parent families; Women's Advocates for homeless domestic violence victims/survivors; YWCA for families and single adults; and Face to Face for homeless youth.

For homelessness prevention, Minnesota Community Care provides emergency financial assistance, including emergency utility assistance in response to the State's Cold- Weather Rule (restricting utility shut-off from October 15 - April 15). ESG/ESG-CV-funded community service agencies recognize that residents experiencing homelessness often have barriers to securing permanent housing, barriers that limit the ability to earn sufficient income to obtain and retain stable housing. In response, the City's ESG/ESG-CV-funded housing and support services, in partnership with the County and Coe priorities and resources, empowered residents experiencing homelessness to move toward self-sufficiency.

In addition to ESG-funded activities, the City owns St. Paul Residence - 120 supportive housing units - 60 units for late stage alcoholics and 60 units for formerly homeless/at-risk of becoming homeless. Operated by Catholic Charities, the Housing First model is used with a focus on providing permanent, affordable housing as quickly as possible and then connections with supportive services and community-based supports to retain housing. Additional beds and services are available at Catholic Charities Dorothy Day.

## CR-75 – Expenditures

### 11. Expenditures

#### 11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2019	2020	2021
Expenditures for Rental Assistance	69,924	35,968	47,228
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	5,112	0	0
Expenditures for Housing Relocation & Stabilization Services - Services	20,763	5,000	5,000
Expenditures for Homeless Prevention under Emergency Shelter Grants Program	0	0	0
<b>Subtotal Homelessness Prevention</b>	<b>95,799</b>	<b>40,968</b>	<b>52,228</b>

Table 25 – ESG Expenditures for Homelessness Prevention

#### 11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2019	2020	2021
Expenditures for Rental Assistance	42,006	164,348	161,083
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	22,515	0	3,265
Expenditures for Housing Relocation & Stabilization Services - Services	0	0	0
Expenditures for Homeless Assistance under Emergency Shelter Grants Program	0	0	0
<b>Subtotal Rapid Re-Housing</b>	<b>64,521</b>	<b>164,348</b>	<b>164,348</b>

Table 26 – ESG Expenditures for Rapid Re-Housing

#### 11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	2019	2020	2021
Essential Services	0	25,963	15,775
Operations	254,695	244,488	258,357
Renovation	45,710	0	0

Major Rehab	0	0	0
Conversion	0	0	0
<b>Subtotal</b>	<b>300,405</b>	<b>270,451</b>	<b>274,132</b>

Table 27 – ESG Expenditures for Emergency Shelter

#### 11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year		
	2019	2020	2021
Street Outreach	30,756	49,787	71,601
HMIS	11,577	11,888	11,888
Administration	0	40,866	55,036

Table 28 - Other Grant Expenditures

#### 11e. Total ESG Grant Funds

Total ESG Funds Expended	2019	2020	2021
	503,058	578,308	629,233

Table 29 - Total ESG Funds Expended

#### 11f. Match Source

	2019	2020	2021
Other Non-ESG HUD Funds	0	0	0
Other Federal Funds	0	0	0
State Government	181,573	658,380	114,672
Local Government	117,708	334,816	0
Private Funds	421,059	463,700	271,997
Other	0	0	45,000
Fees	0	0	0
Program Income	0	0	115,000
<b>Total Match Amount</b>	<b>720,340</b>	<b>1,456,896</b>	<b>546,669</b>

Table 30 - Other Funds Expended on Eligible ESG Activities

**11g. Total**

<b>Total Amount of Funds Expended on ESG Activities</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
	1,223,398	2,035,204	1,175,902

**Table 31 - Total Amount of Funds Expended on ESG Activities**

# Attachment

## CAPER attachments



## HUD ESG CAPER

Grant: ESG: St Paul - MN - Report Type: CAPER

## Report Date Range

6/1/2021 to 5/31/2022

## Contact Information

First Name Loni  
 Middle Name  
 Last Name Aadalen  
 Suffix  
 Title  
 Street Address 1 160 E Kellogg Blvd Suite 9200  
 Street Address 2  
 City St. Paul  
 State Minnesota  
 ZIP Code 55101  
 E-mail Address loni.aadalen@co.ramsey.mn.us  
 Phone Number (651)266-4116  
 Extension  
 Fax Number ()-

## Project types carried out during the program year

Components	Projects	Total Persons Reported	Total Households Reported
Emergency Shelter	9	2732	2116
Day Shelter	2	2665	2140
Transitional Housing	0	0	0
<b>Total Emergency Shelter Component</b>	<b>11</b>	<b>5397</b>	<b>4256</b>
Total Street Outreach	3	493	454
Total PH - Rapid Re-Housing	4	215	95
Total Homelessness Prevention	2	61	33

## Grant information

## Emergency Shelter Rehab/Conversion

Did you create additional shelter beds/units through an ESG-funded rehab project No

Did you create additional shelter beds/units through an ESG-funded conversion project No

## Data Participation information

Are there any funded projects, except HMIS or Admin, which are not listed on the Project Links and Uploads form? This includes projects in the HMIS and from VSP No

How many of the VSP projects have a HUD approved plan and are using a template rather than a comparable database report uploaded? 0

## Project Outcomes

- no data -

## Financial information

- no data -

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**Q05a: Report Validations Table**

Total Number of Persons Served	6166
Number of Adults (Age 18 or Over)	5420
Number of Children (Under Age 18)	687
Number of Persons with Unknown Age	59
Number of Leavers	5452
Number of Adult Leavers	4931
Number of Adult and Head of Household Leavers	4940
Number of Stayers	714
Number of Adult Stayers	489
Number of Veterans	236
Number of Chronically Homeless Persons	2481
Number of Youth Under Age 25	577
Number of Parenting Youth Under Age 25 with Children	57
Number of Adult Heads of Household	4826
Number of Child and Unknown-Age Heads of Household	12
Heads of Households and Adult Stayers in the Project 365 Days or More	101

**Q06a: Data Quality: Personally Identifying Information (PII)**

Data Element	Client Doesn't Know/Refused	Information Missing	Data Issues	Total	% of Error Rate
Name	0	9	42	51	<i>0.83%</i>
Social Security Number	356	563	590	1509	<i>24.47%</i>
Date of Birth	1	334	0	335	<i>5.43%</i>
Race	156	441	0	597	<i>9.68%</i>
Ethnicity	89	505	0	594	<i>9.63%</i>
Gender	1	377	0	378	<i>6.13%</i>
Overall Score				1627	<i>26.39%</i>

Numbers in *green italics* have been recalculated or weighted based on available totals.



**Q06b: Data Quality: Universal Data Elements**

Data Element	Error Count	% of Error Rate
Veteran Status	430	7.93%
Project Start Date	0	0%
Relationship to Head of Household	622	10.09%
Client Location	33	0.68%
Disabling Condition	908	14.73%

Numbers in *green italics* have been recalculated or weighted based on available totals.

**Q06c: Data Quality: Income and Housing Data Quality**

Data Element	Error Count	% of Error Rate
Destination	1643	30.14%
Income and Sources at Start	1233	22.70%
Income and Sources at Annual Assessment	50	49.50%
Income and Sources at Exit	1088	22.02%

Numbers in *green italics* have been recalculated or weighted based on available totals.

**Q06d: Data Quality: Chronic Homelessness**

Entering into project type	Count of Total Records	Missing Time in Institution	Missing Time in Housing	Approximate Date Started DK/R/missing	Number of Times DK/R/missing	Number of Months DK/R/missing	% of Records Unable to Calculate
ES, SH, Street Outreach	2400	0	0	341	353	356	15.90%
TH	0	0	0	0	0	0	0
PH (All)	96	0	0	0	1	4	4.22%
Total	2496	0	0	0	0	0	15.45%

Numbers in *green italics* have been recalculated or weighted based on available totals.

**Q06e: Data Quality: Timeliness**

Time for Record Entry	Number of Project Start Records	Number of Project Exit Records
0 days	1734	1516
1-3 Days	2003	1889
4-6 Days	317	270
7-10 Days	255	247
11+ Days	1231	1304

**Q06f: Data Quality: Inactive Records: Street Outreach & Emergency Shelter**

Data Element	# of Records	# of Inactive Records	% of Inactive Records
Contact (Adults and Heads of Household in Street Outreach or ES - NBN)	164	124	75.61%
Bed Night (All Clients in ES - NBN)	26	20	76.92%

Numbers in *green italics* have been recalculated or weighted based on available totals.

**Q07a: Number of Persons Served**

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Adults	5420	5030	388	0	2
Children	687	0	662	25	0
Client Doesn't Know/ Client Refused	3	0	0	0	3
Data Not Collected	56	0	3	0	53
Total	6166	5030	1053	25	58
For PSH & RRH – the total persons served who moved into housing	117	22	95	0	0

**Q07b: Point-in-Time Count of Persons on the Last Wednesday**

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
January	786	584	187	6	9
April	814	588	211	6	9
July	540	304	223	5	8
October	755	506	237	4	8

**Q08a: Households Served**

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Total Households	4838	4512	315	8	3
For PSH & RRH – the total households served who moved into housing	58	22	36	0	0

**Q08b: Point-in-Time Count of Households on the Last Wednesday**

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
January	426	365	59	1	1
April	449	384	64	0	1
July	337	264	71	1	1
October	388	309	78	0	1

**Q09a: Number of Persons Contacted**



Number of Persons Contacted	All Persons Contacted	First contact – NOT staying on the Streets, ES, or SH	First contact – WAS staying on Streets, ES, or SH	First contact – Worker unable to determine
Once	387	4	339	0
2-5 Times	32	0	25	0
6-9 Times	1	0	1	0
10+ Times	3	0	3	0
Total Persons Contacted	423	4	368	0

**Q09b: Number of Persons Engaged**

Number of Persons Engaged	All Persons Contacted	First contact – NOT staying on the Streets, ES, or SH	First contact – WAS staying on Streets, ES, or SH	First contact – Worker unable to determine
Once	103	1	86	0
2-5 Contacts	16	0	14	0
6-9 Contacts	0	0	0	0
10+ Contacts	0	0	0	0
Total Persons Engaged	119	1	100	0
Rate of Engagement	28.13%	25.00%	27.17%	0



Numbers in *green italics* have been recalculated or weighted based on available totals.

**Q10a: Gender of Adults**

	Total	Without Children	With Children and Adults	Unknown Household Type
Male	3311	3243	68	0
Female	1701	1381	318	2
No Single Gender	17	17	0	0
Questioning	9	9	0	0
Transgender	48	47	1	0
Client Doesn't Know/Client Refused	1	1	0	0
Data Not Collected	333	332	1	0
Total	5420	5030	388	2
Trans Female (MTF or Male to Female) 				
Trans Male (FTM or Female to Male) 				

**Effective 10/1/2021, this table contains a consolidated Transgender row which includes the sum of data from the previously separate Transgender rows, tagged with .**

**Q10b: Gender of Children**

	Total	With Children and Adults	With Only Children	Unknown Household Type
Male	344	332	12	0
Female	340	329	11	0
No Single Gender	0	0	0	0
Questioning	0	0	0	0
Transgender	0	0	0	0
Client Doesn't Know/Client Refused	0	0	0	0
Data Not Collected	3	1	2	0
Total	687	662	25	0
Trans Female (MTF or Male to Female) 				
Trans Male (FTM or Female to Male) 				

**Effective 10/1/2021, this table contains a consolidated Transgender row which includes the sum of data from the previously separate Transgender rows, tagged with .**

**Q10c: Gender of Persons Missing Age Information**

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Male	6	0	0	0	6
Female	1	0	0	0	1
No Single Gender	0	0	0	0	0
Questioning	0	0	0	0	0
Transgender	0	0	0	0	0
Client Doesn't Know/Client Refused	0	0	0	0	0
Data Not Collected	52	0	3	0	49
Total	59	0	3	0	56
Trans Female (MTF or Male to Female) 					
Trans Male (FTM or Female to Male) 					

**Effective 10/1/2021, this table contains a consolidated Transgender row which includes the sum of data from the previously separate Transgender rows, tagged with .**

**Q10d: Gender by Age Ranges**

	Total	Under Age 18	Age 18-24	Age 25-61	Age 62 and over	Client Doesn't Know/ Client Refused	Data Not Collected
Male	3661	344	268	2773	270	3	3
Female	2042	340	268	1366	67	0	1
No Single Gender	17	0	8	8	1	0	0
Questioning	9	0		3	3	0	0
Transgender	48	0	3	31	2	0	0
Client Doesn't Know/Client Refused	1	0	0	0	1	0	0
Data Not Collected	388	3	33	272	28	0	52
<b>Total</b>	<b>6166</b>	<b>687</b>	<b>595</b>	<b>4453</b>	<b>372</b>	<b>3</b>	<b>56</b>
Trans Female (MTF or Male to Female)							
Trans Male (FTM or Female to Male)							

Effective 10/1/2021, this table contains a consolidated Transgender row which includes the sum of data from the previously separate Transgender rows, tagged with .

**Q11: Age**

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Under 5	240	0	234	6	0
5 - 12	315	0	306	9	0
13 - 17	132	0	122	10	0
18 - 24	595	512	83	0	0
25 - 34	1318	1173	145	0	0
35 - 44	1416	1305	110	0	1
45 - 54	1103	1061	42	0	0
55 - 61	616	608	7	0	1
62+	372	371	1	0	0
Client Doesn't Know/Client Refused	3	0	0	0	3
Data Not Collected	56	0	3	0	53
<b>Total</b>	<b>6166</b>	<b>5030</b>	<b>1053</b>	<b>25</b>	<b>58</b>

**Q12a: Race**

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
White	1900	1750	145	4	1
Black, African American, or African	2512	1881	616	13	2
Asian or Asian American	291	235	55	0	1
American Indian, Alaska Native, or Indigenous	273	247	21	4	1
Native Hawaiian or Pacific Islander	24	23	0	0	1
Multiple Races	546	339	205	2	0
Client Doesn't Know/Client Refused	168	167	0	0	1
Data Not Collected	452	388	11	2	51
Total	6166	5030	1053	25	58

**Q12b: Ethnicity**

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Non-Hispanic/Non-Latin(a)(o)(x)	5025	4069	932	19	5
Hispanic/Latin(a)(o)(x)	521	410	107	4	0
Client Doesn't Know/Client Refused	90	90	0	0	0
Data Not Collected	530	461	14	2	53
Total	6166	5030	1053	25	58

**Q13a1: Physical and Mental Health Conditions at Entry**

	Total Persons	Without Children	Adults in HH with Children & Adults	Children in HH with Children & Adults	With Children and Adults ☺	With Only Children	Unknown Household Type
Mental Health Disorder	3075	2938	111	20		4	2
Alcohol Use Disorder	315	313	2	0		0	0
Drug Use Disorder	470	457	13	0		0	0
Both Alcohol Use and Drug Use Disorders	518	509	9	0		0	0
Chronic Health Condition	1027	1010	15	0		2	0
HIV/AIDS	47	47	0	0		0	0
Developmental Disability	472	426	24	22		0	0
Physical Disability	1179	1145	23	10		1	0

☺ The "With Children and Adults" column is retired as of 10/1/2019 and replaced with the columns "Adults in HH with Children & Adults" and "Children in HH with Children & Adults".

**Q13b1: Physical and Mental Health Conditions at Exit**

	Total Persons	Without Children	Adults in HH with Children & Adults	Children in HH with Children & Adults	With Children and Adults ☺	With Only Children	Unknown Household Type
Mental Health Disorder	2834	2724	93	14		3	0
Alcohol Use Disorder	292	289	3	0		0	0
Drug Use Disorder	433	423	10	0		0	0
Both Alcohol Use and Drug Use Disorders	489	480	9	0		0	0
Chronic Health Condition	950	935	13	0		2	0
HIV/AIDS	42	42	0	0		0	0
Developmental Disability	438	402	20	16		0	0
Physical Disability	1103	1070	25	7		1	0

☺ The "With Children and Adults" column is retired as of 10/1/2019 and replaced with the columns "Adults in HH with Children & Adults" and "Children in HH with Children & Adults".



**Q13c1: Physical and Mental Health Conditions for Stayers**

	Total Persons	Without Children	Adults in HH with Children & Adults	Children in HH with Children & Adults	With Children and Adults	With Only Children	Unknown Household Type
Mental Health Disorder	287	249	28	7		1	2
Alcohol Use Disorder	25	25	0	0		0	0
Drug Use Disorder	42	38	4	0		0	0
Both Alcohol Use and Drug Use Disorders	30	29	1	0		0	0
Chronic Health Condition	93	90	3	0		0	0
HIV/AIDS	5	5	0	0		0	0
Developmental Disability	45	32	5	8		0	0
Physical Disability	98	91	4	3		0	0

☞ The "With Children and Adults" column is retired as of 10/1/2019 and replaced with the columns "Adults in HH with Children & Adults" and "Children in HH with Children & Adults".

**Q14a: Domestic Violence History**

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Yes	1640	1420	216	4	0
No	2844	2690	151	3	0
Client Doesn't Know/Client Refused	28	26	2	0	0
Data Not Collected	920	894	20	1	5
Total	5432	5030	389	8	5

**Q14b: Persons Fleeing Domestic Violence**

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Yes	557	462	94	1	0
No	918	795	120	3	0
Client Doesn't Know/Client Refused	15	14	1	0	0
Data Not Collected	150	149	1	0	0
Total	1640	1420	216	4	0

**Q15: Living Situation**

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
<b>Homeless Situations</b>					
Emergency shelter, including hotel or motel paid for with emergency shelter voucher	1916	1751	163	2	0
Transitional housing for homeless persons (including homeless youth)	28	25	3	0	0
Place not meant for habitation	1484	1444	38	2	0
Safe Haven	9	6	3	0	0
Host Home (non-crisis)	1	0	1	0	0
Interim Housing					
<b>Subtotal</b>	<b>3438</b>	<b>3226</b>	<b>208</b>	<b>4</b>	<b>0</b>
<b>Institutional Settings</b>					
Psychiatric hospital or other psychiatric facility	35	35	0	0	0
Substance abuse treatment facility or detox center	67	65	2	0	0
Hospital or other residential non-psychiatric medical facility	77	76	0	1	0
Jail, prison or juvenile detention facility	65	65	0	0	0
Foster care home or foster care group home	3	3	0	0	0
Long-term care facility or nursing home	2	2	0	0	0
Residential project or halfway house with no homeless criteria	20	20	0	0	0
<b>Subtotal</b>	<b>269</b>	<b>266</b>	<b>2</b>	<b>1</b>	<b>0</b>
<b>Other Locations</b>					
Permanent housing (other than RRH) for formerly homeless persons	40	40	0	0	0
Owned by client, no ongoing housing subsidy	18	13	5	0	0
Owned by client, with ongoing housing subsidy	6	5	1	0	0
Rental by client, with RRH or equivalent subsidy	2	2	0	0	0
Rental by client, with HCV voucher (tenant or project based)	5	5	0	0	0
Rental by client in a public housing unit	9	9	0	0	0
Rental by client, no ongoing housing subsidy	120	103	17	0	0
Rental by client, with VASH subsidy	3	3	0	0	0

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Rental by client with GPD TIP subsidy	0	0	0	0	0
Rental by client, with other housing subsidy	101	76	25	0	0
Hotel or motel paid for without emergency shelter voucher	85	67	18	0	0
Staying or living in a friend's room, apartment or house	370	329	38	2	1
Staying or living in a family member's room, apartment or house	238	195	43	0	0
Client Doesn't Know/Client Refused	8	8	0	0	0
Data Not Collected	720	683	32	1	4
<b>Subtotal</b>	<b>1725</b>	<b>1538</b>	<b>179</b>	<b>3</b>	<b>5</b>
Total	5432	5030	389	8	5

Interim housing is retired as of 10/1/2019.

**Q16: Cash Income - Ranges**

	Income at Start	Income at Latest Annual Assessment for Stayers	Income at Exit for Leavers
No income	1729	2	1544
\$1 - \$150	130	0	124
\$151 - \$250	658	0	638
\$251 - \$500	107	0	98
\$501 - \$1000	999	6	912
\$1,001 - \$1,500	297	2	274
\$1,501 - \$2,000	172	1	151
\$2,001+	142	3	145
Client Doesn't Know/Client Refused	13	0	12
Data Not Collected	1173	0	1033
Number of Adult Stayers Not Yet Required to Have an Annual Assessment	0	389	0
Number of Adult Stayers Without Required Annual Assessment	0	86	0
Total Adults	5420	489	4931

**Q17: Cash Income - Sources**

	Income at Start	Income at Latest Annual Assessment for Stayers	Income at Exit for Leavers
Earned Income	393	5	356
Unemployment Insurance	47	1	41
SSI	875	1	814
SSDI	333	1	308
VA Service-Connected Disability Compensation	21	0	21
VA Non-Service Connected Disability Pension	6	0	7
Private Disability Insurance	2	0	2
Worker's Compensation	0	0	0
TANF or Equivalent	185	7	156
General Assistance	872	0	844
Retirement (Social Security)	65	0	61
Pension from Former Job	17	0	16
Child Support	33	2	27
Alimony (Spousal Support)	5	0	5
Other Source	137	0	136
Adults with Income Information at Start and Annual Assessment/Exit	0	14	12

Q19b: Disabling Conditions and Income for Adults at Exit

	AO: Adult with Disabling Condition	AO: Adult without Disabling Condition	AO: Total Adults	AO: % with Disabling Condition by Source	AC: Adult with Disabling Condition	AC: Adult without Disabling Condition	AC: Total Adults	AC: % with Disabling Condition by Source	UK: Adult with Disabling Condition	UK: Adult without Disabling Condition	UK: Total Adults	UK: % with Disabling Condition by Source
Earned Income	173	138	311	55.63%	13	42	55	23.64%	0	0	0	0
Supplemental Security Income (SSI)	717	44	761	94.22%	32	9	41	78.05%	0	0	0	0
Social Security Disability Insurance (SSDI)	283	10	293	96.59%	11	4	15	73.33%	0	0	0	0
VA Service-Connected Disability Compensation	20	1	21	95.24%	0	0	0	0	0	0	0	0
Private Disability Insurance	2	0	2	100.00%	0	0	0	0	0	0	0	0
Worker's Compensation	0	0	0	0	0	0	0	0	0	0	0	0
Temporary Assistance for Needy Families (TANF)	16	6	22	72.73%	58	70	128	45.31%	0	0	0	0
Retirement Income from Social Security	51	10	61	83.61%	1	0	1	100.00%	0	0	0	0
Pension or retirement income from a former job	16	1	17	94.12%	0	0	0	0	0	0	0	0
Child Support	3	2	5	60.00%	8	12	20	40.00%	0	0	0	0
Other source	923	71	994	92.86%	10	17	27	37.04%	0	0	0	0

	AO: Adult with Disabling Condition	AO: Adult without Disabling Condition	AO: Total Adults	AO: % with Disabling Condition by Source	AC: Adult with Disabling Condition	AC: Adult without Disabling Condition	AC: Total Adults	AC: % with Disabling Condition by Source	UK: Adult with Disabling Condition	UK: Adult without Disabling Condition	UK: Total Adults	UK: % with Disabling Condition by Source
No Sources	912	504	1416	64.41%	12	31	43	27.91%	0	0	0	0
Unduplicated Total Adults	2792	767	3559		97	149	246		0	0	0	

Numbers in *green italics* have been recalculated or weighted based on available totals.

**Q20: Type of Non-Cash Benefit Sources**

	Benefit at Start	Benefit at Latest Annual Assessment for Stayers	Benefit at Exit for Leavers
Supplemental Nutritional Assistance Program	2151	10	1991
WIC	73	1	62
TANF Child Care Services	16	1	14
TANF Transportation Services	4	0	4
Other TANF-Funded Services	6	0	6
Other Source	72	0	63

**Q21: Health Insurance**

	At Start	At Annual Assessment for Stayers	At Exit for Leavers
Medicaid	1129	29	1030
Medicare	516	1	433
State Children's Health Insurance Program	317	15	212
VA Medical Services	45	0	43
Employer Provided Health Insurance	45	1	36
Health Insurance Through COBRA	7	0	6
Private Pay Health Insurance	36	0	32
State Health Insurance for Adults	1893	3	1768
Indian Health Services Program	24	0	21
Other	48	0	43
No Health Insurance	1386	1	1216
Client Doesn't Know/Client Refused	35	0	33
Data Not Collected	1110	99	980
Number of Stayers Not Yet Required to Have an Annual Assessment	0	569	0
1 Source of Health Insurance	3231	41	2863
More than 1 Source of Health Insurance	398	4	370

**Q22a2: Length of Participation – ESG Projects**

	<b>Total</b>	<b>Leavers</b>	<b>Stayers</b>
0 to 7 days	4362	4268	94
8 to 14 days	254	218	36
15 to 21 days	155	125	30
22 to 30 days	172	131	41
31 to 60 days	327	253	74
61 to 90 days	167	105	62
91 to 180 days	355	233	122
181 to 365 days	192	82	110
366 to 730 days (1-2 Yrs)	101	14	87
731 to 1,095 days (2-3 Yrs)	35	20	15
1,096 to 1,460 days (3-4 Yrs)	17	3	14
1,461 to 1,825 days (4-5 Yrs)	3	0	3
More than 1,825 days (> 5 Yrs)	26	0	26
Data Not Collected	0	0	0
<b>Total</b>	<b>6166</b>	<b>5452</b>	<b>714</b>



**Q22c: Length of Time between Project Start Date and Housing Move-in Date (post 10/1/2018)**

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
7 days or less	17	11	6	0	0
8 to 14 days	6	3	3	0	0
15 to 21 days	6	3	3	0	0
22 to 30 days	3	1	2	0	0
31 to 60 days	10	0	10	0	0
61 to 180 days	25	3	22	0	0
181 to 365 days	0	0	0	0	0
366 to 730 days (1-2 Yrs)	0	0	0	0	0
Total (persons moved into housing)	67	21	46	0	0
Average length of time to housing	37.52	19.05	46.01	0	0
Persons who were exited without move-in	22	7	15	0	0
Total persons	89	28	61	0	0

Numbers in *green italics* have been recalculated or weighted based on available totals.

**Q22c: RRH Length of Time between Project Start Date and Housing Move-in Date (pre 10/1/2018)**

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
7 days or less					
8 to 14 days					
15 to 21 days					
22 to 30 days					
31 to 60 days					
61 to 180 days					
181 to 365 days					
366 to 730 days (1-2 Yrs)					
Total (persons moved into housing)					
Average length of time to housing					
Persons who were exited without move-in					
Total persons					


Numbers in *green italics* have been recalculated or weighted based on available totals.

**Q22d: Length of Participation by Household Type**

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
7 days or less	4362	4130	168	14	50
8 to 14 days	254	210	43	1	0
15 to 21 days	155	102	52	1	0
22 to 30 days	172	104	68	0	0
31 to 60 days	327	135	190	2	0
61 to 90 days	167	58	108	1	0
91 to 180 days	355	119	235	1	0
181 to 365 days	192	76	112	4	0
366 to 730 days (1-2 Yrs)	101	49	51	1	0
731 to 1,095 days (2-3 Yrs)	35	15	20	0	0
1,096 to 1,460 days (3-4 Yrs)	17	10	6	0	1
1,461 to 1,825 days (4-5 Yrs)	3	3	0	0	0
More than 1,825 days (> 5 Yrs)	26	19	0	0	7
Data Not Collected	0	0	0	0	0
<b>Total</b>	<b>6166</b>	<b>5030</b>	<b>1053</b>	<b>25</b>	<b>71</b>

**Q22e: Length of Time Prior to Housing - based on 3.917 Date Homelessness Started**


	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
7 days or less	382	266	110	6	0
8 to 14 days	57	26	31	0	0
15 to 21 days	44	24	20	0	0
22 to 30 days	57	22	35	0	0
31 to 60 days	144	68	76	0	0
61 to 180 days	371	166	204	1	0
181 to 365 days	226	181	45	0	0
366 to 730 days (1-2 Yrs)	331	236	95	0	0
731 days or more	797	630	167	0	0
Total (persons moved into housing)	2413	1621	785	7	0
Not yet moved into housing	98	15	83	0	0
Data not collected	447	293	144	3	7
Total persons	2954	1927	1010	10	7

**Q23a: Exit Destination – More Than 90 Days**  
 This question is retired as of 10/1/2019. 

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
<b>Permanent Destinations</b>					
Moved from one HOPWA funded project to HOPWA PH					
Owned by client, no ongoing housing subsidy					
Owned by client, with ongoing housing subsidy					
Rental by client, no ongoing housing subsidy					
Rental by client, with VASH housing subsidy					
Rental by client, with GPD TIP housing subsidy					
Rental by client, with other ongoing housing subsidy					
Permanent housing (other than RRH) for formerly homeless persons					
Staying or living with family, permanent tenure					
Staying or living with friends, permanent tenure					
Rental by client, with RRH or equivalent subsidy					
<b>Subtotal</b>					
<b>Temporary Destinations</b>					
Emergency shelter, including hotel or motel paid for with emergency shelter voucher					
Moved from one HOPWA funded project to HOPWA TH					
Transitional housing for homeless persons (including homeless youth)					
Staying or living with family, temporary tenure (e.g. room, apartment or house)					
Staying or living with friends, temporary tenure (e.g. room, apartment or house)					
Place not meant for habitation (e.g., a vehicle, an abandoned building, bus/train/subway station/airport or anywhere outside)					
Safe Haven					
Hotel or motel paid for without emergency shelter voucher					
<b>Subtotal</b>					
<b>Institutional Settings</b>					
Foster care home or group foster care home					

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Psychiatric hospital or other psychiatric facility					
Substance abuse treatment facility or detox center					
Hospital or other residential non-psychiatric medical facility					
Jail, prison, or juvenile detention facility					
Long-term care facility or nursing home					
<b>Subtotal</b>					
<b>Other Destinations</b>					
Residential project or halfway house with no homeless criteria					
Deceased					
Other					
Client Doesn't Know/Client Refused					
Data Not Collected (no exit interview completed)					
<b>Subtotal</b>					
Total					
Total persons exiting to positive housing destinations					
Total persons whose destinations excluded them from the calculation					
Percentage	Cannot calculate <sup>1</sup>	Cannot calculate <sup>1</sup>	Cannot calculate <sup>1</sup>	Cannot calculate <sup>1</sup>	Cannot calculate <sup>1</sup>

Numbers in *green italics* have been recalculated or weighted based on available totals.

**Q23b: Exit Destination – 90 Days or Less**  
 This question is retired as of 10/1/2019. 

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
<b>Permanent Destinations</b>					
Moved from one HOPWA funded project to HOPWA PH					
Owned by client, no ongoing housing subsidy					
Owned by client, with ongoing housing subsidy					
Rental by client, no ongoing housing subsidy					
Rental by client, with VASH housing subsidy					
Rental by client, with GPD TIP housing subsidy					
Rental by client, with other ongoing housing subsidy					
Permanent housing (other than RRH) for formerly homeless persons					
Staying or living with family, permanent tenure					
Staying or living with friends, permanent tenure					
Rental by client, with RRH or equivalent subsidy					
<b>Subtotal</b>					
<b>Temporary Destinations</b>					
Emergency shelter, including hotel or motel paid for with emergency shelter voucher					
Moved from one HOPWA funded project to HOPWA TH					
Transitional housing for homeless persons (including homeless youth)					
Staying or living with family, temporary tenure (e.g. room, apartment or house)					
Staying or living with friends, temporary tenure (e.g. room, apartment or house)					
Place not meant for habitation (e.g., a vehicle, an abandoned building, bus/train/subway station/airport or anywhere outside)					
Safe Haven					
Hotel or motel paid for without emergency shelter voucher					
<b>Subtotal</b>					
<b>Institutional Settings</b>					
Foster care home or group foster care home					

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Psychiatric hospital or other psychiatric facility					
Substance abuse treatment facility or detox center					
Hospital or other residential non-psychiatric medical facility					
Jail, prison, or juvenile detention facility					
Long-term care facility or nursing home					
<b>Subtotal</b>					
<b>Other Destinations</b>					
Residential project or halfway house with no homeless criteria					
Deceased					
Other					
Client Doesn't Know/Client Refused					
Data Not Collected (no exit interview completed)					
<b>Subtotal</b>					
Total					
Total persons exiting to positive housing destinations					
Total persons whose destinations excluded them from the calculation					
Percentage	Cannot calculate <sup>1</sup>	Cannot calculate <sup>1</sup>	Cannot calculate <sup>1</sup>	Cannot calculate <sup>1</sup>	Cannot calculate <sup>1</sup>

Numbers in *green italics* have been recalculated or weighted based on available totals.



Q23c: Exit Destination – All persons

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
<b>Permanent Destinations</b>					
Moved from one HOPWA funded project to HOPWA PH	0	0	0	0	0
Owned by client, no ongoing housing subsidy	2	0	2	0	0
Owned by client, with ongoing housing subsidy	6	1	5	0	0
Rental by client, no ongoing housing subsidy	71	16	55	0	0
Rental by client, with VASH housing subsidy	0	0	0	0	0
Rental by client, with GPD TIP housing subsidy	0	0	0	0	0
Rental by client, with other ongoing housing subsidy	237	29	208	0	0
Permanent housing (other than RRH) for formerly homeless persons	18	11	7	0	0
Staying or living with family, permanent tenure	26	2	24	0	0
Staying or living with friends, permanent tenure	0	0	0	0	0
Rental by client, with RRH or equivalent subsidy	11	10	1	0	0
Rental by client, with HCV voucher (tenant or project based)	26	12	14	0	0
Rental by client in a public housing unit	19	0	19	0	0
<b>Subtotal</b>	<b>416</b>	<b>81</b>	<b>335</b>	<b>0</b>	<b>0</b>
<b>Temporary Destinations</b>					
Emergency shelter, including hotel or motel paid for with emergency shelter voucher	114	67	46	1	0
Moved from one HOPWA funded project to HOPWA TH	0	0	0	0	0
Transitional housing for homeless persons (including homeless youth)	9	5	3	1	0
Staying or living with family, temporary tenure (e.g. room, apartment or house)	124	27	94	3	0
Staying or living with friends, temporary tenure (e.g. room, apartment or house)	146	28	117	1	0
Place not meant for habitation (e.g., a vehicle, an abandoned building, bus/train/subway station/airport or anywhere outside)	2913	2854	6	10	43
Safe Haven	0	0	0	0	0
Hotel or motel paid for without emergency shelter voucher	23	2	21	0	0
Host Home (non-crisis)	0	0	0	0	0
<b>Subtotal</b>	<b>3329</b>	<b>2983</b>	<b>287</b>	<b>16</b>	<b>43</b>

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
<b>Institutional Settings</b>					
Foster care home or group foster care home	1	1	0	0	0
Psychiatric hospital or other psychiatric facility	1	1	0	0	0
Substance abuse treatment facility or detox center	7	3	4	0	0
Hospital or other residential non-psychiatric medical facility	4	4	0	0	0
Jail, prison, or juvenile detention facility	0	0	0	0	0
Long-term care facility or nursing home	0	0	0	0	0
<b>Subtotal</b>	13	9	4	0	0
<b>Other Destinations</b>					
Residential project or halfway house with no homeless criteria	0	0	0	0	0
Deceased	4	3	1	0	0
Other	42	18	24	0	0
Client Doesn't Know/Client Refused	17	11	6	0	0
Data Not Collected (no exit interview completed)	1631	1532	90	2	7
<b>Subtotal</b>	1694	1564	121	2	7
<b>Total</b>	5452	4637	747	18	50
Total persons exiting to positive housing destinations	399	103	296	0	0
Total persons whose destinations excluded them from the calculation	9	8	1	0	0
Percentage	7.33%	2.23%	39.68%	0%	0%

Numbers in *green italics* have been recalculated or weighted based on available totals.

**Q24: Homelessness Prevention Housing Assessment at Exit**

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Able to maintain the housing they had at project start--Without a subsidy	19	7	12	0	0
Able to maintain the housing they had at project start--With the subsidy they had at project start	32	5	27	0	0
Able to maintain the housing they had at project start--With an on-going subsidy acquired since project start	0	0	0	0	0
Able to maintain the housing they had at project start--Only with financial assistance other than a subsidy	0	0	0	0	0
Moved to new housing unit--With on-going subsidy	0	0	0	0	0
Moved to new housing unit--Without an on-going subsidy	0	0	0	0	0
Moved in with family/friends on a temporary basis	1	1	0	0	0
Moved in with family/friends on a permanent basis	0	0	0	0	0
Moved to a transitional or temporary housing facility or program	0	0	0	0	0
Client became homeless - moving to a shelter or other place unfit for human habitation	4	4	0	0	0
Client went to jail/prison	0	0	0	0	0
Client died	0	0	0	0	0
Client doesn't know/Client refused	2	2	0	0	0
Data not collected (no exit interview completed)	0	0	0	0	0
<b>Total</b>	<b>58</b>	<b>19</b>	<b>39</b>	<b>0</b>	<b>0</b>

**Q25: Number of Veterans**

	Total	Without Children	With Children and Adults	Unknown Household Type
Chronically Homeless Veteran	115	115	0	0
Non-Chronically Homeless Veteran	121	118	3	0
Not a Veteran	4738	4358	379	1
Client Doesn't Know/Client Refused	18	18	0	0
Data Not Collected	428	421	6	1
<b>Total</b>	<b>5420</b>	<b>5030</b>	<b>388</b>	<b>2</b>

**Q26b: Number of Chronically Homeless Persons by Household**

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Chronically Homeless	2481	2312	168	1	0
Not Chronically Homeless	2441	1616	819	6	0
Client Doesn't Know/Client Refused	28	25	3	0	0
Data Not Collected	1216	1077	63	18	58
Total	6166	5030	1053	25	58

## **Affirmatively Further Fair Housing (AFFH) Narrative**

### **CITY OF SAINT PAUL**

As a recipient of U.S. Department of Housing and Urban Development (HUD) funding, inclusive of Community Development Block Grant (CDBG), Home Investment Partnerships (HOME) funds, and Emergency Solutions Grant (ESG) funds, the City of Saint Paul (City) has the obligation to Affirmatively Further Fair Housing, and to take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.

To "affirmatively further fair housing," the City of Saint Paul will:

- *Analyze and eliminate housing discrimination in the jurisdiction.*
- *Promote fair housing choice for all persons.*
- *Provide opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability, and national origin.*
- *Promote housing that is structurally accessible to, and usable by, all persons, particularly persons with disabilities.*
- *Foster compliance with nondiscrimination provisions of the Fair Housing Act.*

The City's obligation to affirmatively further fair housing applies to all housing and housing related activities in the grantee's jurisdictional area whether publicly or privately funded. The City's Human Rights Ordinance prohibits discrimination by private parties, such as owners, lessees, managing agents, real estate brokers, real estate sales persons, appraisers, developers, banks, banking organizations, mortgage companies, insurance companies, or other persons having the right to sell, rent, or lease any real property (City of Saint Paul Legislative Code, Chapter 183.06). Correspondingly, the City's public policies and regulations were adopted to foster equal opportunity for all to obtain employment, education, real property, public accommodations, public services, contract, and franchise without regard to race, creed, religion, sex, sexual or affectional orientation, color, national origin, ancestry, familial status, age, disability, marital status or status with regard to public assistance, and strictly in accord with their individual merits as human beings.

During program year 2021, the City used its housing policy and housing practices to determine whether its actions to affirmatively further fair housing expanded housing opportunities that promoted fair housing choice; worked with the Fair Housing Implementation Council (FHIC) to consider regional approaches to Fair Housing issues;

provided housing services for limited-English-speaking residents; and financed affordable housing and affordable supportive housing.

The City's CAPER demonstrates that its housing programs, housing policies and procedures actively work to remove the identified impediments while also furthering fair housing, as noted below.

## **CITY HOUSING PROGRAMS AND PROCEDURES THAT AFFIRMATIVELY FURTHER FAIR HOUSING CHOICE**

### **AFFORDABLE HOUSING**

Although affordable housing issues are not fair housing concerns per se, the lack of affordable housing in the Twin Cities effectively reduces housing choices for many protected classes. Many communities lack affordable housing opportunities and economic conditions can impact the development or preservation of affordable housing. Over half of renter households earning up to 100% of AMI are identified as being cost burdened with 26% cost burdened (with housing costs greater than 30% of income) and 27% severely cost burdened (with housing costs greater than 50% of income). For homeownership households, 24% of households earning up to 100% of AMI are cost burdened and 18% are severely cost burdened. To rent a modest two-bedroom apartment, Ramsey County workers must earn \$25.15 per hour and work 40 hours per week all year long. However, the typical renter in Ramsey County earns the equivalent of \$19.15 per hour (published by the National Low-Income Housing Coalition, *Out of Reach Minnesota: 2021*). Nearly half of all renters, 48%, are living in housing not affordable to them (2020, 1-Year American Community Survey data from the U.S. Census).

The City Council passed resolution 18-1204, calling for action to create and preserve housing that is affordable at all income levels; address racial, social and economic disparities in housing; create infrastructure needed to stabilize housing; fund an Affordable Housing Trust Fund; and fund down payment assistance for first-time homebuyers. This resolution is a public acknowledgement that housing, especially affordable housing, is a priority for the City. The 2040 Comprehensive Plan also supports affordable housing development. Policy H-32 states "Continue to use City/HRA resources to support affordable rental housing citywide with at least 30 percent of the total rental units (both market-rate and affordable) financially assisted by the City/HRA being affordable to households earning 60 percent or less of AMI with at least: 10% of all units being affordable to households earning 30% of AMI; 10% of all units being affordable to households earning 50% of AMI; and 10% of all units being affordable to households earning 60% of AMI.

Saint Paul Public Housing Agency (PHA) is an important provider of affordable housing for thousands of Saint Paul households with the greatest need (households at or below 30% of AMI). PHA owns and manages 418 public housing units and 3,836 units with Project-Based Rental Assistance (PBRA) that were converted from public housing via HUD's Rental Assistance Demonstration (RAD) effective January 1, 2020. PHA also currently administers

4,929 Housing Choice Vouchers (HCVs). In total, PHA provides over 9,000 affordable homes to more than 22,000 people.

During PY21, the City provided financing or favorable loan terms to preserve, renovate, or construct affordable rental housing for households at or below 60% of AMI. The City used a combination of financing that included LIHTC, HUD funds, TIF, and City STAR funds. Total units developed or preserved were 844. Of these 431 were affordable – 136 through preservation and 295 through new construction.

#### **ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING (AI)**

As a contributing member of the FHIC, the City worked with regional partners and contracted with the Lawyers Committee for Civil Rights Under Law to draft the 2020 AI. The 2020 AI was finalized by the Fair Housing Implementation Council (FHIC) and The Lawyers Committee for Civil Rights Under Law on January 21, 2021. During the process of drafting the 2020 AI, the Preserving Community and Neighborhood Choice Rule was published and adopted. Our understanding is that there is no longer a formal regulatory or compliance requirement to submit this plan, however, the FHIC has submitted the Final AI to the local field office for feedback.

In the 2014 AI, the following impediments were noted:

1. Potential homebuyers of color are denied for home purchase loans at rates exceeding white homebuyers;
2. Higher rates of exit from homeownership among households of color;
3. Homeownership perceived as unattainable by some households of color;
4. Predatory lending practices towards immigrants, communities of color, and disabled households in the form of contract for deeds;
5. Housing choices for people of color are impacted by perceptions about school performance and neighborhood safety;
6. Limited number of rental units available with 3 or more bedrooms;
7. High rental application denial rates in communities of color and those with disabilities based on rental selection criteria (criminal background, credit history, rental background);
8. Inability to place tenants utilizing rental assistance especially for those with disabilities, households with children, and households of color, including by not limited to Housing Choice Vouchers (HCV);

9. Development processes in local government can limit construction of affordable housing for people with disabilities; and
10. NIMBY-ism regarding siting and placement of affordable housing.

In the Addendum to the 2014AI, the following goals were identified:

1. Improve opportunities for mobility within the region.
2. Reduce resident displacement.
3. Increase access to homeownership.
4. Expand funding for affordable housing.
5. Improve fair and affordable housing planning.
6. Expand locations of affordable housing.
7. Institute effective and meaningful community engagement.
8. Invest in place-based community improvements.
9. Support multicultural housing needs.
10. Support residents' fair housing rights.

In the 2020 AI, the following goals were identified:

1. Increase the supply of affordable housing in high opportunity areas.
2. Preserve the existing stock of affordable rental housing.
3. Support homeownership for households of color.
4. Prevent Displacement of Black and Brown low- and moderate-income residents.
5. Increase community integration for person with disabilities.
6. Ensure equal access to housing for person with protected characteristics, lower-income, and homeless.
7. Expand access to opportunity for protected classes.
8. Reduce barriers to mobility.

The FHIC is currently working to identify and prioritize the goals and strategies within the 2020 AI to be addressed as a region. The City of Saint Paul intends to continue to work



towards understanding the impediments and operationalizing the goals identified in this AI through coordination with the FHIC and within our individual jurisdiction.

### **THE QUALIFIED ALLOCATION PLAN**

2014 AI (See Impediments: #6, #7, #8, #10) (See Goals: #2, #4, #6, #8)

With an allocation of \$909,721 and \$799,764 for Low-Income Housing Tax Credits (9% credits) for 2021 and 2022, the City has limited financial capacity to produce affordable rental housing. If the 9% allocation is combined with the 4% tax credits, the City is able to finance 6 affordable housing developments each year. As a result, the City must partner with HUD, Minnesota Housing Finance Agency (MHFA), and various foundations to develop other comprehensive financing plans necessary to develop/preserve affordable housing. It is essential that MHFA tax credits are allocated in a manner that equitably develops more affordable housing metro-wide which will advance fair housing choice within the Twin Cities metro area.

The HRA'S LIHTC Qualified Allocation Plan (QAP) encourages economic integration and housing stability citywide with production and preservation of affordable housing throughout the City. The QAP prioritizes projects that create larger, family sized housing, promotes greater access to housing by limiting security deposits and denials based on rental and credit history, and projects that commit to longer periods of affordability. An additional condition for receiving LIHTC through the HRA is developing tenant screening guidelines that implement the 2016 HUD Fair Housing Guidance related to the use of criminal history.

During the program year, the City established a two-year QAP (2022-2023), which sets the priorities and requirements for multifamily projects that will request funding in the 2021 and 2022 RFPs. This included changes to the procedural manual, selection priorities and scorecard. Full details of changes can be found [here](#). Notable changes include:

#### **9% Tax Credits**

- Further prioritized increasing supply for those with the lowest incomes by:
  - Increasing points for 30% AMI units
  - Increasing points for 50% AMI units
  - Increasing points for units serving homeless households
- Added a new point category to penalize applicants who engage in any of the Unacceptable Practices described in the Procedural Manual
- Further prioritized innovative strategies by adding a new point category to incentivize affordability commitments that extend beyond the required 30 years.

#### **4% HTC**

- Increased minimum point threshold score to 40 points –
- Further prioritized innovative strategies through long term affordability commitments by:

- Extending the baseline affordability term to 30 years
- Adjusting point category to incentivize longer term affordability commitments
- Further prioritized increasing supply for those with the lowest incomes by:
  - Increasing points for 50% AMI units
  - Increasing points for 30% AMI units
  - Added a new point category for units serving homeless households
- Further prioritized wealth building by adding the “Future Tenant Ownership” and “Enhanced Services, Programming and Amenities” point categories
- Added a new point category to penalize applicants who engage in any of the Unacceptable Practices described in the Procedural Manual

**ACCESSIBILITY ISSUES – ACCESSIBLE-DESIGNED HOUSING AND CITY SERVICES**

2014 AI (See Impediments: #8, #9) (See Goal: #10)

Saint Paul's affordable housing policies effectively create more accessible rental housing units because large multi-family housing developments (5 units or more) must comply with the American with Disabilities Act (ADA) and Section 504.

Persons with physical challenges also typically need city services that can encourage self-reliance. In response, the City continues to upgrade city services that can assist residents with disabilities, such as new City traffic lights designed to respond to the needs of visually-impaired residents and the Ramsey County Emergency Community Center's Vital Emergency Response Information Form that lessens the emergency response time for emergencies affecting City residents with disabilities.

The City's *Complete Streets* policies considered the needs of all street users of all ages and abilities in the process of street design. The City's Transportation Committee (comprised of 4 Saint Paul Planning Commissioners and 8 community members, including an accessibility representative) advises the City Planning Commission on how to better integrate transportation planning and projects with land use decisions such as zoning, neighborhood and comprehensive planning, and infrastructure investments. The Transportation Committee reviewed planning or design documents for consistency with *Complete Streets* approach and Universal Design guidelines. These apply to all City projects including infrastructure and public improvements paid for in whole or part with HUD funds.

The City's *8-80's Vitality* initiative was designed to increase activity and vitality on City streets and public spaces by making these more accessible to people of all ages and abilities. Under this initiative, pending funding, Victoria Park will have universally accessible play area for visitors of all abilities. During PY21, Eastview play area was renovated with the replacement and addition of play equipment that meets Consumer Protection Safety Commission and American's with Disabilities Act guidelines. The project provided accessibility and safety

measures with the appropriate resilient surfacing; enhanced the park's site features; and filled the family-oriented activity needs of the adjacent diverse neighborhood.

Additionally, in 2019 the City hired the first Accessibility Coordinator in the Department of Human Rights and Equal Economic Opportunity (HREEO). The ADA Coordinator coordinates programs to implement and sustain compliance with the American Disabilities Act (ADA) and Limited English Proficiency (LEP) programs for the City of Saint Paul and continue to make Saint Paul a more inclusive and accessible city for residents and visitors.

#### **AFFORDABLE SUPPORTIVE RENTAL HOUSING**

2014 AI (See Impediments: #6, #7 #8, #9, #10) (See Goals: #2, #4, #6, #8)

To further fair housing choice, the City recognizes the diverse needs of its residents by financing supportive housing citywide and that serves residents with challenges or barriers to housing. In PY2021, the City utilized waivers provided by HUD through the CARES Act to stabilize two troubled HOME-assisted supportive housing projects. Saint Paul has existing affordable supportive housing developments located citywide, including the City-owned Saint Paul Residence (60 units for at-risk of being homeless, and 60 units for long-term homeless units for late stage alcoholics or those with chemical dependency in the Midway neighborhood).

Catholic Charities Dorothy Day Residence and Opportunity Center, opened in early PY 2019, 171 permanent supportive housing (PSH) units, all of which were occupied in PY 2019. Of these units 15 have been reserved for single adults experiencing long term homelessness and 11 units are reserved for homeless youth. The first two floors of the building provide the Opportunity Center which consists of dining facilities, a health clinic, and office space for programming and other services to address the needs of homeless adults (including many residents with mental health barriers) residing in Saint Paul.

City staff also participated with the MHFA Stabilization Committee and Stewardship Committee to facilitate the financing of supportive housing and/or assist with affordable housing developments at-risk of financial difficulties.

#### **ZONING CODE**

2014 AI (See Impediment: #10) (See Goal: #5, #6, #7, #8)

As a baseline, the City's Zoning Code supports the development of supportive housing because the Zoning Code only requires conditional use permits for supportive housing developments over a certain size or density within residential, traditional neighborhood districts, business and industrial districts. The Zoning Code defines supportive housing as one (1) main building, or portion thereof, on one (1) zoning lot where persons with mental illness, chemical dependency, physical or mental handicaps, and/or persons who have experienced homelessness reside and wherein counseling, training, support groups, and/or

similar services are provided to the residents. The Zoning Code also allows SRO facilities to be built in more areas which consequently facilitated the development of the City-owned Saint Paul Residence that serves residents experiencing homelessness with late stage chronic alcoholism and at-risk of becoming homeless.

The Zoning Code also encourages high density affordable rental housing along transit corridors, such as Central Corridor, which allows for easy access to major employment opportunities. For example, Prior Crossing (supportive housing for homeless young adults) and the Ain Dah Yung Supportive Housing (culturally-response supportive housing for American Indian young adults) are located on University Avenue and the Green Line light rail.

Accessory Dwelling Units (ADU) are now allowed in expanded areas of the City; Sustainable Building Regulations Ordinance established sustainable building regulations for buildings owned, operated or funded by the City ensuring energy efficiency and sustainability and thus lower costs for building owners and ultimately tenants.

The City has supported and approved more recent zoning changes to increase opportunities for multifamily and affordable housing: Both the Marshall Ave Zoning Study and Stryker Ave Zoning Study rezoned multiple properties to expand locations for multifamily and affordable housing on two corridors of the City.

The definition of *Family* was identified for study by the 2040 Comprehensive Plan and City Council Resolution 18-1204. Since 1975, Saint Paul's Zoning Code has used the term *Family* to regulate the number of unrelated occupants allowed in one residential dwelling unit. Under that regulation, only four (4) unrelated people could occupy a dwelling unit, or two (2) parents with their children along with two (2) other people. During the program year, the Saint Paul City Council adopted the following changes:

*Family. Household.* Six (6) or fewer adults ~~together with~~ and minor children in their care, ~~as a single housekeeping unit~~ living together in a dwelling unit.

#### **CITY'S HOUSING STRATEGIES TO END HOMELESSNESS**

2014 AI (See Impediments: #6, #7, #8, #9, #10) (See Goal: #7)

Homelessness is not a fair housing issue per se. However, many adults entering emergency shelters and transitional housing in Ramsey County are representative of protected classes. Furthermore, the status of homelessness effectively has a disparate discriminatory impact because many long-term homeless residents face housing barriers due to challenges with mental health, brain injury, developmental disabilities, cognitive learning disabilities, and/or chemical dependency. Consequently, there is a continuing need to develop and maintain affordable supportive housing.

For many residents experiencing homelessness, the lack of economic opportunities is also a major barrier to obtaining and retaining stable housing. As previously stated, on average,

Ramsey County renters lack enough income (i.e. a minimum hourly wage of \$25.15) to pay the fair-market rent for a two-bedroom apartment. In addition, households who lack sufficient education and/or job training skills are more at-risk of becoming homeless due to the inability to qualify for or find higher wage employment.

The City and Ramsey County receive Emergency Solutions Grant (ESG) funding through direct allocations from HUD. In order to administer the deployment of City ESG funds more efficiently, the City entered into a Joint Powers Agreement (JPA) with the County during the program year. The County administers the ESG funds; selects subrecipients and enters into contracts to implement use of funds; processes subrecipient reimbursements; monitors subrecipient performance; manages HMIS data collection and required reporting to HUD and the City.

During the early days of the pandemic, street outreach service models were revised to follow public health guidance, in some cases resulting in a temporary reduction in services provided during the program year. Some service providers changed how services were provided by doing so over the phone or through virtual/remote meetings, while others modified their in-person practices with PPE and social distancing for employees and clients.

#### **Coordinated Response to Unsheltered Homelessness During COVID-19**

Since 2018, the City has been actively responding to encampments through coordination and outreach in collaboration with Ramsey County, and nonprofit partners. Protocols are in place to monitor the safety and health of encampment residents and ensure access to services.

The City acts to restrict, limit, or close encampments when necessary to protect the health, safety, or security of encampment residents. Before any action is taken on an encampment the City works with Ramsey County and nonprofit partners to find safe, stable housing for encampment residents. Our guiding principles:

- Everyone experiencing unsheltered homelessness is deserving of being treated with dignity and respect and in accordance with their rights.
- Every effort must be made to connect people to housing, shelter, and services.
- Encampments do not provide a safe, healthy, or secure living environment.

The COVID-19 pandemic has had a significant impact on the numbers of people who are experiencing homelessness, and the related economic impacts have led to more residents living in unsafe conditions in tents, under bridges, in caves.

The pandemic also has affected the way local jurisdictions respond to encampments. With the goal of limiting the spread of COVID-19, Governor Tim Walz's peacetime emergency and subsequent Executive Orders outline the conditions under which local jurisdictions can restrict, limit or close encampments. Those orders allow encampments to be cleared if a local governmental entity is either providing sufficient alternate housing, shelter or

encampment space that complies with public health guidance, or if an encampment has reached a size or status that is a documented threat to the health, safety or security of residents. We work in collaboration with Ramsey County and our outreach partners to gather information and make decisions on a case-by-case basis to ensure our efforts align with City principles and the Governor's Orders.

Efforts remain focused on supporting the safety and health of unsheltered residents amid this pandemic and beyond. Our strategies include responding to the increased need for shelter, housing supports, and housing options, and expanding access to meals, sanitary services, healthcare, mental/chemical health assessments, day space, and shelter options for women, youth, LGBTQ, and other specific needs.

The rising number of encampments during the pandemic has led at times to friction with nearby neighbors and businesses. One response has been City support of the "Block by Block" program, which employs Ambassadors to not only help maintain clean and welcoming streets in the downtown area but also to assist individuals experiencing homelessness access services. Ambassadors may also provide crime prevention information. When a law enforcement response is called for, Saint Paul Police are able to call upon specialized units and increased patrols in targeted areas.

**Responding to needs of homeless persons** - Funding was awarded as follows:

**People Inc. – Metropolitan Homeless Street Outreach Program (MHSOP)** - Provided street outreach to unsheltered adults with mental illness – working directly with residents living outside or in camps. MHSOP services through street outreach were basic survival gear, benefits assistance, and assistance in stabilizing mental health symptoms. Outreach Specialists addressed housing needs and worked with Ramsey County Group Residential Housing Program (housing and services) to assist participants in securing stable housing.

**RADIAS Health (South Metro Human Services) – ACCESS Program** - Provided outreach and case management services to unsheltered adults with serious and persistent mental illness and substance abuse disorders in Ramsey County. Staff worked at shelters, Dorothy Day Center, and drop-in centers. ESG funds were also used for street outreach services in partnership with the Saint Paul Police Department program using licensed clinical social workers and housing vouchers from MHFA to provide stable housing.

**CARES Act Emergency Solutions Grant - ESG-CV** - \$7,992,924 was awarded to the City. From that award, additional funding was provided to street outreach through People, Inc. and RADIAS Health to enhance efforts already funded through the City's annual ESG allocation, and Breaking Free was funded to provide street outreach to women and children escaping sexual exploitation, all with an emphasis on efforts to prevent, prepare for and respond to the coronavirus and those most vulnerable to the impact of the coronavirus.

Jurisdiction's Progress: Adequate funding for street outreach remains a concern and was made more difficult by the spread of COVID-19. In response, the City's ESG funded street outreach efforts were focused on unsheltered residents, emergency shelter and rapid re-housing in response to COVID-19 during PY21. At the same time, the City, Ramsey County, and Saint Paul Foundation granted additional funds to community service providers for comprehensive street outreach to unsheltered residents sheltering in downtown skyways and on light-rail transit. Ramsey County and partners continued Safe Space shelter with connection to supportive services and some day-time services such as limited storage lockers, showers, and coffee in the morning.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

Recognizing financial limitations during PY21, Saint Paul addressed emergency shelter and transitional housing needs of unsheltered residents as follows:

Emergency Solutions Grant (ESG) - City ESG partially funded operational costs of emergency shelters and transitional housing services, street outreach to unsheltered residents, homelessness prevention, and Rapid Re-Housing (RRH) programs assisting residents experiencing homelessness. These funds supplemented community services financed through the Ramsey County Continuum of Care (CoC) and state-funded Family Homelessness Prevention Assistance Program (FHPAP).

Emergency Shelter – City ESG grant dollars partially funded operational costs of Dorothy Day Center Higher Ground (emergency shelter-adults), Family Service Center (emergency family shelter), Lutheran Social Services (LSS) Safe House (emergency youth shelter), Salvation Army Booth Brown House, (emergency youth shelter), Interfaith Action (emergency family shelter), Neighborhood House (hotel/motel voucher stays) and the Day Center (day center for homeless families). With additional support from Ramsey County, Saint Paul Foundation, and the City, Model Cities also operated an overnight shelter, Safe Space, with additional beds initially only during the coldest months but now open all year.

Rapid Re-Housing (RRH) - ESG partially funded Face to Face Safe Zone (RRH services for homeless youth), Theresa Living Center (homeless women and single-parent families) and Community Stabilization Project (CSP) (homeless families).

Transitional Housing - ESG partially funded operating costs for transitional housing for single-parent families at the Theresa Living Center and YWCA St. Paul.

**Dorothy Day Center ReVision** – The Catholic Charities Higher Ground facility provided: 280 shelter beds (including medical respite and pay-for-stay beds), and 193 permanent single room occupancy (SRO) supportive housing units. The Saint Paul Dorothy Day Residence and Opportunity Center provided 177 permanent housing units integrated with a one-stop

location to connect people with critical services to improve health, income, housing stability, and well-being. In calendar year 2020, beds were reduced to half and in mid-2021, beds again increased to maximum capacity (pre-pandemic).

ESG-CV - funded the YWCA (transitional housing for women), Face to Face (RRH services for homeless youth), Theresa Living Center (RRH for homeless women and single-parent families), Breaking Free (RRH services for women and children escaping sexual exploitation), and Community Stabilization Project (RRH homeless families), Women's Advocates (RRH and rental assistance for homeless domestic violence victims/survivors. Interfaith Action, Model Cities, Emma Norton, Catholic Charities, and Listening House (day-shelter) received funding for emergency shelter operations.

Due to COVID-19 the number of beds available for emergency shelter decreased to ensure social distancing. Ramsey County filled in this gap by funding additional beds in alternative locations, e.g. hotels, and working with the City and social service organizations to identify alternative emergency shelter space. As the program year came to a close, emergency shelters had opened additional space within their facilities in order to maintain social distancing and continue to provide an equivalent or nearly equivalent number of beds pre-COVID-19. Ramsey County opened a separate shelter space with individual rooms for unsheltered residents experiencing COVID symptoms not severe enough to require hospitalization. City-County work group identified additional shelter space throughout the City and County.

**Helping low-income individuals and families avoid becoming homeless** – Ramsey County funds community programs and counseling to previously institutionalized or homeless individuals by funding nonprofit service providers that assist low-income individuals and families in the transition to permanent housing. The County and its community partners administer the primary social service networks that perform these functions and include assistance for childcare, job training, transportation, mental health counseling, chemical dependency treatment, and job search assistance.

The City's ESG Program funded homelessness prevention programs in partnership with Minnesota Community Care (in partnership with Ramsey County) – HouseCalls/Families in Crisis. Prevention services offered included, financial assistance for utility payments, rent payments, rental deposits – all necessary to secure and maintain stable housing. Ramsey County chose to shift to one prevention program due to the increase in federal and state funding during the pandemic. ESG-CV was not used for prevention services.

Saint Paul has a long history of funding supportive housing facilities, which include Crestview, Visitation, Jackson Street Village, Jeremiah Program, St. Christopher's Place; and Saint Paul Residence which continues to provide 120 supportive housing units (60 units for late stage chronic alcoholics and 60 units for formerly homeless residents including some adults who may have been discharged from publicly-funded institutions). Catholic Charities' new



Catholic Charities Higher Ground facility provides 280 shelter beds which includes medical respite beds, pay-for-stay beds, and 193 permanent SRO supportive housing units. Phase II opened late 2019 adding 177 SRO supportive housing units and a new Opportunity Center. Ain Dah Yung Supportive Housing development provides 42 supportive housing units for homeless youth with a focus on American Indian culture, an underserved community.

Overall, the City and County worked with its community agency partners to fund programs that assist residents experiencing homelessness, including allocating CDBG funds for the Block Nurse Program and neighborhood non-profit programs that helped residents in need.

In summary, during PY21, affordable housing and supportive services were provided within the City of Saint Paul to residents experiencing homelessness and residents needing supportive housing, including the elderly, frail elderly, persons with disabilities, persons with HIV/AIDS, persons with chemical dependency, and those with limited English-speaking proficiency. That said, more affordable housing and more affordable supportive housing are needed citywide. In response, the City continues to finance affordable housing developments, and the City of Saint Paul's Comprehensive Plan includes strategies to facilitate the development of affordable housing citywide.

Other City initiatives: established a local Housing Trust Fund; funding for community land trusts to provide new pathways to homeownership and promote long-term affordable community ownership; created a database of naturally occurring affordable housing (NOAH) units to assess risk of conversion and identify opportunities for preservation, established a rental supplement program in partnership with local foundations and social service providers for households at/below 50% AMI, established a down payment assistance program and enrolled 89 properties in the 4(d) property tax incentive program to stabilize and preserve existing affordable housing units.

### **Helping homeless persons (especially chronically homeless) make the transition to permanent housing and independent living**

In partnership with Ramsey County CoC, the City assisted adults, families, and youth experiencing homelessness with the following services:

Homeless Adults - Catholic Charities Higher Ground and Opportunity Center providing 177 permanent housing units integrated with a one-stop location to connect people with critical services to improve health, income, housing stability, and well-being. Saint Paul Residence provided permanent supportive housing using the Housing First model (60 units for those with late stage chronic alcoholism and 60 units for long term homeless residents) which focuses on providing permanent, affordable housing as quickly as possible and then provides the supportive services and connections to community-based supports needed for individuals/families to keep their housing.

Homeless Families – Homeless families were assisted with transitional housing/RRH programs through Catholic Charities, Family Service Center, YWCA St. Paul, and Theresa Living Center. Prevention initiatives included rental assistance, legal services, and utility assistance through Neighborhood House, Southern Minnesota Regional Legal Services, and WSCHS HouseCalls all of which provided supportive services to those at risk of losing their housing.

Homeless Youth - Recognizing that the number of emergency shelter beds/housing for homeless youth remains insufficient, the City partially financed emergency shelters, drop-in centers, and RRH services. Partners included the Salvation Army, LSS Safe House, Ain Dah Yung (focused on American Indian youth), and Face to Face Safe Zone.

Homeless Veterans - MACV provided street outreach and RRH services for homeless veterans through other federal funds as of March 2021.

Affordable Housing - The lack of affordable housing is often cited as a reason for homelessness. In response, Saint Paul allocated City (Housing and Redevelopment Authority and sales tax), Federal financing allocations (LIHTC and tax-exempt bonds) and HUD funds (CDBG, HOME) to construct or preserve affordable housing. New initiatives included: established a local Housing Trust Fund; funding for community land trusts to provide new pathways to homeownership and promote long-term affordable ownership; creation of a database of NOAH units across the City to inform preservation strategies; implemented Families First, a rental supplement program with supportive services for households at/below 50% AMI and a child in St. Paul Public schools; enrolled 89 properties in the 4(d) program with property tax incentives to stabilize and preserve existing affordable housing units; and continued the rental rehab program providing loans to landlords for building improvements provided they maintain affordable rents.

The City's owner-occupied rehab program and its non-profit partners improved homeowner housing conditions. The HRA'S LIHTC Qualified Allocation Plan (QAP) encourages economic integration and housing stability with production and preservation of affordable housing throughout the city. The QAP prioritizes projects that create larger, family sized housing units and projects that commit to longer periods of affordability and promotes greater access to housing by limiting security deposits and denials based on rental and credit history. An additional condition for receiving LIHTC through the HRA is developing tenant screening guidelines that implement the 2016 HUD Fair Housing Guidance related to the use of criminal history.

#### **CITY'S HOME LOAN FUND**

2014 AI (See Impediments: #1, #2, #3, #4) (See Goal: #3)

During PY 2021, the City's Home Loan Fund provided home improvement loans to CDBG-income eligible homeowners, including Deferred Payment Due-on-Sale Home Improvement

loans and Saint Paul/Ramsey County Lead Paint Window Replacement program. The City's Home Loan Fund assisted 15 households comprised of 5 female-headed households and 8 households challenged with disabilities. In total, the City's Home Loan Fund assisted 9 White households, 2 Black households, 4 Asian households, 0 Native American or Pacific Islander households, and 1 Hispanic household. Most importantly, the City Home Loan Fund assisted those households in most need including 2 households at 0-30% AMI; 7 households at 31-50% AMI; 6 households at 61-80% AMI.

To further promote fair housing choice, the City's Home Loan Fund staff provided multilingual home ownership services in Hmong language and have staff who speak Hmong, and Spanish. Language translation services are also provided, as needed. The City's website is also translatable.

In addition to the City's Home Loan Fund program, the City worked with various community development corporations, such as Dayton's Bluff Neighborhood Housing Services (DBNHS), Neighborhood Development Alliance, Inc. (NeDA), NeighborWorks Home Partners (NWHP), North East Neighborhoods Development Corporation (NENDC), Rondo Community Land Trust (RCLT), and Twin Cities Habitat for Humanity which provided neighborhood-based housing programs that were responsive to the needs of City residents and City priorities. NeDA's multi-lingual/multi-cultural housing services assisted Spanish-speaking residents living in the West Side neighborhood. DBNHS and NENDC also have bi-literate Hmong staff to assist its LEP Hmong households living in the East Side neighborhoods.

In recognition that 1 in 5 City residents speaks a language other than English in their homes and in accordance with Title VI of the Civil rights Act of 1964, 42 U.S.C. § 2000d and Executive Order 13166, the City has developed a Limited English Proficiency Plan (LEP). Based on data collected from a variety of sources, including the Saint Paul Public Schools and the U.S. Census Bureau, the City's primary language groups that are non-English include, but are not limited to Spanish, Hmong, and Somali. This means that increasingly, City employees are providing services to individuals who may be limited English proficient (LEP) because of national origin. The City's LEP Language Access Plan outlines and describes how the City will improve access to its services for LEP individuals.

The City is committed to making its services and information about those services available to everyone, regardless of language barriers. As residents, workers or visitors who contribute to the quality of life in the City, LEP individuals are entitled to meaningful access to City services. As a recipient of federal financial assistance, the City is required by federal law to plan for and provide meaningful access to City services for LEP individuals.

#### **MORTGAGE FORECLOSURE PREVENTION PROGRAM**

2014 AI (See Impediments: #1, #2, #3, #4) (See Goal: #3)

The City of Saint Paul is one of several HUD-approved housing counseling agencies providing counseling in the City of Saint Paul under the umbrella of the Minnesota Home Ownership Center (MNHOC). The network of agencies providing mortgage default/early delinquency counseling in the City assist households with guidance and assistance for submission of mortgage modifications, working with their mortgage servicer on a smooth transition out of the home (short sale or deed in lieu of foreclosure), and providing information about the foreclosure process and moving on after foreclosure.

During the program year, the network of agencies provided individualized mortgage foreclosure prevention counseling by working with homeowners to create an action plan and viable budget. In addition, housing advisors provide referrals to community resources, such as food shelves, formal budget counseling, bankruptcy counseling, legal aid and as necessary emergency assistance from Ramsey County. In addition, the City of Saint Paul contracted with the Minnesota Homeownership Center to provide emergency mortgage assistance payments using CDBG and CDBG-CV funding awarded through the CARES Act.

Finally, although predatory lending practices are not discriminatory per se, predatory lending practices may have a disparate discriminatory impact on communities of color, lower income households, the elderly, and those with lower credit scores.

#### **INSPIRING COMMUNITIES PROGRAM**

2014 AI (See Impediments: #1, #2, #3, #4) (See Goal: #3)

The City of Saint Paul's *Inspiring Communities* program was created to consolidate properties, both for new construction and rehabilitation, acquired with NSP, CDBG, and HRA funds under a single strategy. The *Inspiring Communities* program largely focuses investment on geographically defined cluster areas in neighborhoods most impacted by foreclosure and vacancy. The program funds assist developers with development gap financing for construction of new housing on vacant lots or rehabilitation of vacant structures. As a neighborhood redevelopment program, *Inspiring Communities* also created construction job opportunities for local residents, Section 3 certified businesses, M/W/SBEs, and advanced equity in contracting and workforce hiring.

#### **Cumulative Impact of Inspiring Communities**

Since 2008, the City has allocated more than \$45,000,000 of federal, state, and local funds to revitalize vacant and foreclosed properties in designated Saint Paul neighborhoods. Approximately 300 properties have been sold or are in the process of being sold. *Inspiring Communities* has developed energy-efficient, sustainable, and affordable homes in areas of Saint Paul with the greatest need for stable housing. The quality of housing increased the overall affordability, as these homes should not require major capital investments for 10-15 years. Additionally, these investments encouraged neighboring homeowners to reinvest in their properties and neighborhoods. During PY 2021, 5 new homes were constructed and

sold to income-eligible households. Purchasers of Inspiring Communities homes are eligible to receive up to \$5,000 in financial assistance to help complete the purchase.

**CITY'S EFFORT TO AFFIRMATIVELY FURTHER FAIR HOUSING BY ENSURING AVAILABLE HOUSING SERVICES TO LIMITED ENGLISH PROFICIENCY RESIDENTS**

2014 AI (See Impediment: #4) (See Goals: #3, #7)

The City of Saint Paul recognizes that limited English proficiency (LEP) residents are often unable to access housing service information in their primary languages. In recognition that 1 in 5 City residents speaks a language other than English in their homes and in accordance with Title VI of the Civil rights Act of 1964, 42 U.S.C. § 2000d and Executive Order 13166, the City has developed a Limited English Proficiency Plan (LEP). Based on data collected from a variety of sources, including the Saint Paul Public Schools and the U.S. Census Bureau, the City's primary language groups that are non-English include, but are not limited to Spanish, Hmong, and Somali. This means that increasingly, City employees are providing services to individuals who may be limited English proficient (LEP) because of national origin. The City's LEP Language Access Plan outlines and describes how the City will improve access to its services for LEP individuals.

The City is committed to making its services and information about those services available to everyone, regardless of language barriers. As residents, workers or visitors who contribute to the quality of life in the City, LEP individuals are entitled to meaningful access to City services. As a recipient of federal financial assistance, the City is required by federal law to plan for and provide meaningful access to City services for LEP individuals. The City's HREEO department coordinates and maintains the City's LEP program. The Planning and Economic Development department has an LEP policy with multilingual staff to provide information about the following housing programs, which are also listed on the City's website, which is translatable:

**City Down Payment Assistance**

2014 AI (See Impediments: #1, #2,) (See Goal: #3)

The City launched a Down payment Assistance Program to provide financial assistance for homebuyers at or below 60% Area Median Income (AMI). Qualified homebuyers were eligible to receive up to \$40,000 for a home down payment, closing costs, and/or property inspection. The program was developed to protect and preserve naturally occurring affordable housing in neighborhoods vulnerable to displacement and gentrification pressures.

**Minnesota Home Ownership Center (MNHOC) Home Buyer Education Classes**

2014 AI (See Impediments: #1, #2, #3, #4) (See Goals: #3, #7, #9)

Minnesota maintains a high homeownership rate, approximately 72%, but has a 36-percentage point disparity in homeownership rates between white/non-Hispanic

households and households of color (*MHP State of the State's Housing 2021*), ranked the 5<sup>th</sup> largest disparity in the country (*Key Trends in Housing*, Minnesota Housing Finance Agency, January 2018).

That said, the City financially supported the Minnesota Homeownership Center (MNHOC) which offers individualized financial wellness and home buyer counseling, homebuyer education classes (*Home Stretch* workshops), including multicultural and multilingual homebuyer classes. Homeownership workshops were held in English, Hmong, Somali, Karen, and Spanish. The MNHOC also works directly with the African Development Center and African Economic Development Solutions to outreach to Somali and Africans new to America. MNHOC's *Framework*, an online educational program, is offered in Spanish. Because of these efforts, 82% (402 of 490) of households participating in homebuyer education and 75% (269 of 358) of households participating in financial wellness and homebuyer counseling identified as people of color.

Subsequently, Fannie Mae worked with the MNHOC's *Framework* in which households who purchase Fannie Mae properties through its *HomeReady Buyer* program will be eligible for up to 3% off the purchase price of the home in the form of closing cost assistance. Fannie Mae's *HomeReady Buyer* program acknowledges that industry leaders recognized the value of homeownership education and counseling.

To improve homeownership education classes, MNHOC also performs pre- and post-workshop surveys (in English and Spanish) for which 98% of *Home Stretch* workshop participants stated that *Home Stretch* helped provide confidence in the home-buying process.

Finally, even with its budgetary restrictions, the City continued its funding of MNHOC – recognizing that the MNHOC's home buyer classes and counseling serve first-time low- to moderate-income (LMI) homebuyers and provides a leadership role in responding to foreclosures.

#### ***City's Home Loan Fund/Mortgage Foreclosure Prevention Program***

2014 AI (See Impediments: #7, #8, #9) (See Goals: #3, #7)

To ensure access to housing programs, the City's Home Loan Fund's staff provided home ownership services and default counseling in Hmong and other language translation services, as needed.

#### ***Relocation Counseling***

2014 AI (See Impediments: #10, #11, #12) (See Goal: #7)

The City has the ability provide culturally sensitive relocation assistance, if needed. During the program year 3 households were relocated from an HRA-owned property. Each household used English as a second language and spoke Hmong, Karen or Burmese as a

primary language. Interpreters and translated materials were used in the respective languages of the tenants.

#### **HOME OWNERSHIP ALLIANCE - EMERGING HOUSING MARKET INITIATIVES**

During the program year, the City participated with MNHOCs *Home Ownership Alliance* (HOA) initiative, a collaboration of more than 30 organizations committed to equitable homeownership for people of color and lower-income households. The HOA brings together organizations that represent a range of communities, including the NeDA, NWHP, and Twin Cities Habitat for Humanity. The HOA leverages these partnerships to create paths for underserved communities to achieve equitable, affordable homeownership.

An example of the HOA's collaborative innovation is the launch of the "Get Ready. Be Ready" campaign to reach African Americans in Saint Paul's East Side and North Minneapolis. To reach these potential homeowners, HOA works with community representatives to create key messages addressing known myths about homeownership, and invest in community radio and print media, along with social media and outreach to community leaders. In the coming year, HOA will expand this outreach to other populations affected by a lack of access, including East African, Hispanic, and Southeast Asian communities.

The HOA is also advocating for systems change in the very programs intended to advance affordable homeownership. Research has shown that the existing down payment assistance (DPA) ecosystem is inconsistently funded, limits consumer choice, and hinders buyers' ability to compete in a tight market. Further, lenders can be reluctant to work with complex programs with varying features and cite uncertainty about compliance with the secondary market as an obstacle to working with DPA programs.

This initiative will disrupt the status quo and advance a consumer-centered down payment system statewide, with the potential for national replicability; centralization of resources, non-profit leaders supporting lenders and consumers, common underwriting, consistent features, and broader geographic availability.

#### **SAINT PAUL DEPARTMENT OF HUMAN RIGHTS AND EQUAL ECONOMIC OPPORTUNITY (HREEO)**

2014 AI (See Impediments: #1, #2 #3, #4, #5, #8) (See Goals: #7, #9)

Pursuant to the Saint Paul Human Rights Ordinance (SPHRO), City HREEO staff respond to human rights complaints. HREEO is a City Department dedicated to eliminating housing disparities and discrimination under the local civil rights ordinance and the FHA. During 2015, Saint Paul Human Rights Division was granted full certification as a HUD Fair Housing Assistance Partner which effectively increased the Human Rights Division's capacity in bringing the authority of the Fair Housing Act to eligible complaints. Discrimination cases falling under the Fair Housing Act and the SPHRO were investigated by the Human Rights

Division and cross-filed with HUD's Office of Fair Housing and Equal Opportunity (FHEO). Subsequently, HREEO is the only FHAP that is substantially equivalent under HUD's work-sharing agreement in the State of Minnesota. The human rights team has an extensive history of eradicating housing discrimination. All the investigators and leadership are fully trained under HUD requirements including the 5-week investigators' training in Washington, D.C. HREEO's staff have conducted Fair Housing continuing legal education training for attorneys and professionals in the housing and property management fields. Furthermore, staff have considerable experience with attempting and conducting conciliation.

During the program year, the Human Rights Division increased its visibility in the community by participating in outreach activities and events. Human Rights Specialists are responsible for the investigations and outreach for the HREEO department and have exceeded the case production for a jurisdiction of this size. HREEO has a long history of taking on challenging policy issues, and producing timely, thorough and useful investigations which have led to individual complainant remedies as well as wider public interest policy changes with landlords and housing providers in our jurisdiction.

The diversity of HREEO's staff reflects the communities it serves. This team is fluent in several languages which include Amharic, Oromo, Hmong, Spanish, and Tagalog. In the past, HREEO's staff partnered with the Equal Opportunity Commission and the U.S. Department of Labor to coordinate and organize outreach to the Hmong Community through their vulnerable workers project. In other efforts, HREEO staff has worked with Saint Paul Police and the Autistic Society of Minnesota to facilitate a collaborative effort to improve interactions between police and residents with autism.

**LEGAL SERVICES: SOUTHERN MINNESOTA LEGAL REGIONAL SERVICES**

2014 AI (See Impediments: #1, #2, #3, #4, #5 #7, #8) (See Goals: #2, #9)

Often, legal representation is needed to enforce fair housing rights. In response, the City has financially supported the Housing Equality Law Project, administered by Southern Minnesota Regional Legal Services (SMRLS) which provides fair housing enforcement services.

With this grant, the City funded legal support to assist Saint Paul residents who are treated unfairly when seeking or maintaining their housing. Legal services included negotiated settlements, assisted with filing of complaints with enforcement agencies, and represented people in court. Persons who benefit from these services include low-income persons of color, immigrants and refugees, disabled persons, and female heads of households and their families who were treated unfairly, and in violation of anti-discrimination laws, by landlords when they look for housing, live in housing, or try to keep their housing. In PY2021 the City contracted CDBG-CV funds to partially fund SMRLS's legal representation for residents experiencing homelessness or those at-risk of becoming homeless to stabilize their housing.



**CITY'S EFFORT TO AFFIRMATIVELY FURTHER FAIR HOUSING THROUGH ANTI-DISPLACEMENT AND INCREASED ACCESS STRATEGIES**

2014 AI (See Impediments: #1, #3, #7, #8, #9, #10) (See Goals: #1- #10)

**City's Housing Trust Fund Strategy**

During the program year, the City continued to operationalize the Housing Trust Fund (HTF) strategy. The HTF serves as a flexible financial tool used to address the current crisis of housing affordability in Saint Paul. Current issues facing the Saint Paul housing market include increasing costs of labor and materials limiting new construction, housing costs rising at a quicker pace than average incomes, and significant racial disparities in homeownership.

The HTF strategy identifies five key objectives to address housing issues:

1. Meet the needs of those with the lowest incomes by increasing housing supply. The lowest income residents in Saint Paul are the most cost-burdened and have the fewest existing housing options.
2. Invest in low- and moderate-income residents by investing in the existing housing supply. Maintaining housing options that are already serving low- and moderate-income families will ensure the City does not lose ground on increasing the supply and will prevent displacement.
3. Explore innovative approaches to meeting housing needs. Piloting programs and options to produce affordable opportunities more efficiently will allow more residents to be served.
4. Build wealth for residents and communities. Targeting housing investments in ways that increase affordability and the resources available to low-income residents and communities.
5. Promote fair access to housing for all City residents. Expanding tenant protections, landlord training, and coordination among City departments to ensure fair access to housing and prevention of displacement.

The Housing Trust Fund, established in PY18, will invest \$16 million in affordable housing using the strategies described above. Recent investments include:

- Investments in innovative models for homeownership and wealth building including Accessory Dwelling Units and Community Land Trusts
- Financing to preserve unsubsidized naturally occurring affordable housing units and prevent displacement
- Families First Housing Pilot rental supplement program
- Community Land Trust demonstration program

**Families First** - The City continued enrollment for the Families First Housing Pilot which provides Saint Paul families a \$300 monthly rent supplement and ongoing supportive services for three years, in partnership with the Saint Paul Public Schools. Eligible families are those with incomes at or below 30% AMI, who pay 40% or more of their income for rent,

are not receiving another housing subsidy, and have at least one Pre-K to 3rd-grade student enrolled in a participating school. The City invested \$3 million through the Housing Trust Fund to support up to 250 families in underperforming schools with ongoing rental support. Additional funds to provide supportive services from community partners were awarded through grants from philanthropic partners.

#### **Office of Financial Empowerment**

During PY 2019, the Office of Financial Empowerment developed a framework for a Fair Housing strategy with overarching goals of decreasing housing displacement, increasing housing access and Affirmatively Furthering Fair Housing. The City has a fair housing strategy framework that aligns community and department work in four core areas: Preservation and Production, Education and Engagement, Enforcement and Compliance, and Tenant Protections. During the program year, the City focused on Tenant Protections, passing, and implementing a tenant protections ordinance , S.A.F.E. Housing Saint Paul.

The ordinance included five policy provisions:

##### **Tenant Screening Guidelines**

The Tenant Screening Guidelines policy ensures fair access to housing by creating uniform guidelines related to the use of rental, criminal and credit history in applicant screening.

##### **Security Deposit Limitations**

The Security Deposit Limitation policy ensures equitable access to housing by limiting the upfront charges related to Security Deposits and Prepaid Rent.

##### **Just Cause Notice Policy**

The Just Cause Notice policy improves housing stability by ensuring owners establish one (1) of ten (10) Just Causes and provide renters with written Just Cause Notice when nonrenewing a renter's Lease.

##### **Advance Notice policy**

The Advance Notice policy supports the preservation of affordable housing and addresses the displacement pressures renters may face during ownership changes by ensuring that current owners provide notice of proposed sale to the City of Saint Paul and renters before an affordable housing building is placed on the market and new owners provide a notice of sale after the transfer of ownership occurs, coupled with a Tenant Protection period.

##### **Rights and Responsibilities Information**

The City will also make a Rights and Responsibilities packet and poster available support owners and renters and understanding their rights, responsibilities, and the resources available to them.

On June 23, 2021, the City Council repealed the Saint Paul Tenant Protection Ordinance after a federal judge temporarily enjoined enforcement of the ordinance.

**CITY'S EFFORTS TO DEVELOP A REGIONAL APPROACH THAT AFFIRMATIVELY FURTHERS FAIR HOUSING - Fair Housing Implementation Council (FHIC)**

2014 AI (See Impediments: #1, #2, #3, #4, #5, #6)

The City recognized that a regional approach was necessary to effectively eliminate impediments to fair housing and promote fair housing opportunities. In response, Saint Paul partnered with Bloomington, Eden Prairie, Minneapolis, Plymouth, Minnetonka, Woodbury, Anoka County, Carver, Dakota County, Hennepin County, Ramsey County, and Washington County as members of the Fair Housing Implementation Council (FHIC) to collectively develop a regional Analysis of Impediments to Fair Housing Choice and partner on regional fair housing education and initiatives.

During the program year, the FHIC contracted with The Lawyers Committee for Civil Rights Under Law to draft the 2020 AI. The 2020 AI was finalized by the Fair Housing Implementation Council (FHIC) and The Lawyers Committee for Civil Rights Under Law on January 21, 2021. During the process of drafting of the 2020 AI, the Preserving Community and Neighborhood Choice Rule was published and adopted. Our understanding is that there is no longer a formal regulatory or compliance requirement to submit this plan, however, the FHIC has submitted the Final AI to the local field office for feedback.

The FHIC is currently working to identify and prioritize the goals and strategies within the 2020 AI to be addressed as a region . The City of Saint Paul intends to continue to work towards understanding the impediments and addressing the goals identified in this AI through coordination with the FHIC and within our individual jurisdiction. A copy of the document may be found here: [2020 Regional Analysis of Impediments to Fair Housing Choice \(AI\)](#)

**SUMMARY**

The City is committed to providing equal opportunity to all people in all areas of City services and City programs. This document identified actions that affirmatively furthered fair housing. That said, Saint Paul affirmatively furthers fair housing in four distinct ways - funding, participation, direct service, and policy.

While the City works to remove impediments to Fair Housing, there remains a constant need for fair housing work as part of the fabric that makes up Saint Paul government, its rules, and regulations. The City of Saint Paul remains committed to ensuring every resident is able to fully realize fair housing.

# **TWIN CITIES REGIONAL ASSESSMENT OF FAIR HOUSING**



**Prepared by  
the Lawyers' Committee for Civil Rights Under  
Law**

**January 21, 2021**

**TABLE OF CONTENTS**

**TABLE OF CONTENTS** .....2

**II. Executive Summary**.....3

**III. Community Participation Process**.....11

**IV. Assessment of Past Goals**.....16

**V. Fair Housing Analysis** .....45

**A. Demographic Summary**.....45

**B. General Issues** .....88

**i. Segregation/Integration** .....88

**ii. Racially or Ethnically Concentrated Areas of Poverty (RECAPs)** .....139

**iii. Disparities in Access to Opportunity**.....147

**iv. Disproportionate Housing Needs**.....164

**C. Publicly Supported Housing Analysis** .....229

**D. Disability and Access** .....252

**E. Fair Housing Enforcement, Outreach Capacity and Resources** .....289

**VI. Fair Housing Goals and Priorities**.....295

**VII. Appendices**.....301

**A. Contributing Factors Appendix** .....301

**B. Data Documentation Appendix**.....347

**C. Segregation/Integration Appendix**.....353

**D. Disparities in Access to Opportunity Appendix** .....401

**E. Publicly Supported Housing Appendix** .....585

**F. Public Comments Index** .....618

## **II. Executive Summary**

The Twin Cities Regional Analysis of Impediments to Fair Housing choice (AI) is a thorough examination of structural barriers to fair housing choice and access to opportunity for members of historically marginalized groups protected from discrimination by the federal Fair Housing Act (FHA). This analysis specifically analyzes the following jurisdictions in the Twin Cities Region: Anoka County, Coon Rapids, Dakota County, Hennepin County, Bloomington, Eden Prairie, Minneapolis, Minnetonka, Plymouth, Ramsey County, St. Paul, Washington County, Woodbury, Scott County and Carver County. While Coon Rapids and Minnetonka are no longer classified as entitlement jurisdictions, the two cities were included in this analysis, as they were entitlement jurisdictions for the majority of the 5-year period between AIs conducted for the Region.

In addition to analyzing and identifying barriers to fair housing choice within the Region, this AI also outlines meaningful strategies that can be implemented to achieve progress towards the various entitlement jurisdictions' obligation to affirmatively further fair housing. The Lawyers' Committee for Civil Rights Under Law (Lawyers' Committee), in consultation with the Twin Cities Fair Housing Implementation Council (FHIC) prepared this AI. To provide a foundation for the conclusions and recommendations presented in this AI, the Lawyers' Committee reviewed and analyzed:

- Data from the U.S. Census Bureau and other sources about the demographic, housing, economic, and educational landscape of the Consortium, nearby communities, and the broader region;
- Local housing production and education data;
- Various County and City planning documents and ordinances;
- Data reflecting housing discrimination complaints;
- The input of a broad range of community groups and stakeholders that deal with the realities of the housing market and the lives of members of protected classes in the Twin Cities Region.

The AI draws from these sources to conduct an analysis of fair housing issues such as patterns of integration and segregation of members of protected classes, racially or ethnically concentrated areas of poverty regionally, disparities in access to opportunity for protected classes, and disproportionate housing needs. The analysis also examines publicly supported housing in the city as well as fair housing issues for persons with disabilities. Private and public fair housing enforcement, outreach capacity, and resources are evaluated as well. The AI identifies contributing factors to fair housing issues and steps that should be taken to overcome these barriers.

### **Overview of the Twin Cities Region**

The Twin Cities Region falls within the Minneapolis-St. Paul-Bloomington, MN-WI metropolitan statistical area. The Region has historically been overwhelmingly white and remains so to this day, despite a growing number of immigrants of color. Minneapolis and St. Paul specifically are the most diverse, both of which have historical enclaves of Black residents. The cities have growing Hispanic/Latinx populations, as well as growing communities of Hmong and Somali residents. With the exception of smaller suburbs immediately outside of the urban centers the remainder of

the region remains extremely white, despite small concentrations of Black, Indigenous and other people of color (BIPOC).

Patterns of segregation and disparities in access to opportunity in housing and other areas are very stark in the Twin Cities. The same characteristics that make the Twin Cities an ideal place to live for many—environmental healthy neighborhoods, proficient schools, and high home ownership rates, to name a few—are not at all equally experienced by the Region’s communities of color, low-income communities, and persons with disabilities. Neighborhoods with higher concentrations of BIPOC residents have less access to proficient schools, are less environmentally healthy, have less access to transportation and jobs and have higher rates of poverty. Many jurisdictions within the region have taken significant steps to improve access to safe and affordable housing, including increased contributions to Housing Trust Funds, zoning changes, larger and deeper affordability requirements for new developments, and reform of code enforcement services. At the same time, however, the Twin Cities region is attractive to outside investors using their capital to fund massive new developments that are not affordable for many residents. Smaller, outer ring suburbs have also experienced Not in My Backyard (NIMBY) sentiment from residents in response to attempts to develop more affordable housing or allow for increased density. In addition, as the urban centers become less affordable, many residents are being pushed out to the suburbs. Transit-oriented development has provided additional transportation options throughout the larger suburban/rural region, but has also been met with critiques of displacement and gentrification of communities of color that once resided in the new transit corridors.

Further, as civil rights attorneys, we would be remiss not to acknowledge that systemic racism within the Region has led to strategic disinvestment in communities of color, and over-policing of Black and Brown bodies. These disparities were brought to the forefront in Minneapolis following the murder of George Floyd by officers of the Minneapolis Police Department. The police were called by the clerk of a Minneapolis convenience store, located at 38<sup>th</sup> Street and Chicago Avenue, over an allegedly counterfeit \$20 bill. Since then, residents of the Region and the country have stood up to demand that police no longer be able to ravage Black communities. This event has sparked important conversations in the Region and beyond, and we hope that as a result, data in future Analyses of Impediments will show increased opportunity to housing, jobs, and schools for historically disadvantaged populations.

### **Contributing Factors to Fair Housing Issues**

In addition to the main sections of the AI, this analysis includes a discussion of the following contributing factors to fair housing issues:

1. Access to financial services
2. Access for persons with disabilities to proficient schools
3. Access to publicly supported housing for persons with disabilities
4. Access to transportation for persons with disabilities
5. Admissions and occupancy policies and procedures, including preferences in publicly supported housing
6. Availability of affordable units in a range of sizes
7. Availability, type, frequency, and reliability of public transportation
8. Community opposition

9. Deteriorated and abandoned properties
10. Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
11. Displacement of residents due to economic pressures
12. Impediments to mobility
13. Inaccessible public or private infrastructure
14. Inaccessible government facilities or services
15. Lack of access to opportunity due to high housing costs
16. Lack of affordable, accessible housing in a range of unit sizes
17. Lack of affordable in-home or community-based supportive services
18. Lack of affordable, integrated housing for individuals who need supportive services
19. Lack of assistance for housing accessibility modifications
20. Lack of assistance for transitioning from institutional settings to integrated housing
21. Lack of community revitalization strategies
22. Lack of local private fair housing outreach and enforcement
23. Lack of local public fair housing enforcement
24. Lack of local or regional cooperation
25. Lack of meaningful language access for individuals with limited English proficiency
26. Lack of private investment in specific neighborhoods
27. Lack of public investment in specific neighborhoods, including services or amenities
28. Lack of resources for fair housing agencies and organizations
29. Lack of state or local fair housing laws
30. Land use and zoning laws
31. Lending discrimination
32. Location of accessible housing
33. Location of employers
34. Location of environmental health hazards
35. Location of proficient schools and school assignment policies
36. Location and type of affordable housing
37. Loss of affordable housing
38. Occupancy codes and restrictions
39. Private discrimination
40. Quality of affordable housing information programs
41. Regulatory barriers to providing housing and supportive services for persons with disabilities
42. Siting selection policies, practices, and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
43. Source of income discrimination
44. State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing and other integrated settings
45. Unresolved violations of fair housing or civil rights law



## **Proposed Goals and Strategies**

The following goals and strategies were developed and refined using the aforementioned data sources and extensive conversations with community groups, local stakeholders, community members, and jurisdiction staff.

*Goal 1: Increase the supply of affordable housing in high opportunity areas.*

- Change existing land use and zoning laws, where possible, to allow for more types of affordable housing, such as Accessory Dwelling Units (ADUs), Single Room Occupancy (SRO) multi-family projects, or other low cost models such as tiny homes.
- Provide additional investments in the Affordable Housing Trust Funds in St. Paul and Minneapolis and additional investments in affordable housing in the other jurisdictions.
- Provide funding to assist community organizations in purchasing, rehabilitating, and leasing dilapidated rental properties. Ensure that these organizations have the right of first refusal to purchase prior to outside, for-profit developers.
- Condition the distribution of grant funds to jurisdictions by the Metropolitan Council based on communities providing concrete plans to meet their fair share of the decennial affordable housing needs.
- Expand bonus point offerings in RFPs to incentivize the development of large units with three or more bedrooms.

*Goal 2: Preserve the existing stock of affordable rental housing.*

- Partner with the Minnesota Attorney General's office to develop land lease and other protections for residents of manufactured home communities.
- Provide restrictions on the "flipping" of affordable rental housing by outside investors. Require that 1) a large percentage of units remain affordable at deeper levels of affordability; 2) previous tenants have rights of return; and 3) displaced tenants have access to relocation services.
- Rehabilitate and maintain the existing stock of publicly owned, affordable single-family homes. Provide regular inspection and maintenance of these properties.
- Provide Advanced Notice of Sale and Tenant Opportunity to Purchase/first right of refusal for tenants of affordable housing units that are for sale.

*Goal 3: Support homeownership for households of color.*

- Develop partnership with local lending institutions to conduct homebuyer and financial literacy education targeted at communities of color.
- Develop a program or policy to provide for regular review of local lending practices for fair housing issues.
- Increase funding for down payment assistance programs.
- Fund and facilitate credit counseling and improvement programs targeted at communities of color.
- Provide more opportunities for families on public assistance to transition to ownership.

- Provide long-term support for communities of color beyond down payment assistance, such as additional funding programs for necessary repairs.

*Goal 4: Prevent Displacement of Black and Brown low- and moderate-income residents.*

- Pilot a Right to Counsel Program to provide pro bono counsel to tenants facing eviction.
- Pass localized Just Cause Eviction protections and advocate for statewide Just Cause eviction legislation.
- Advocate for statewide rent control/stabilization legislation.
- Consider the impact of transit-oriented development and preserve additional units in mixed income developments along transit corridors
- Establish a minimum nonpayment of rent threshold for evictions of \$100 and adopt a rule which allows tenants to cure by paying the full amount owed up to and including the date of trial for the eviction.
- Establish a policy for regular community participation in advance of approving new development in areas populated by low- and moderate-income Black and Brown residents. To ensure maximum participation, these meetings should be held at a variety of times be accessible via public transportation, be in locations that are ADA accessible, and provide food and perhaps childcare, if the meeting occurs in the evening.
- Establish policies that provide for analysis of potential fair housing impacts of new development in areas populated by low- and moderate income Black and Brown residents.
- Conduct or contract for regular research on gentrification and displacement throughout the region.
- Provide funding for rent relief programs, foreclosure prevention programs, and small business support in distressed areas.
- Establish use of the Equitable Development Scorecard to evaluate all new residential and mixed-use development proposals.

*Goal 5: Increase community integration for person with disabilities.*

- Increase the supply of integrated permanent supportive housing by utilizing Project-Based Vouchers in developments that include units that have rents that are within Housing Choice Voucher payment standards as a result of inclusionary zoning programs. Require a set-aside of permanent supportive housing units through requests for proposals and notices of funding availability under the HOME Investment Partnerships programs as well as under locally-funded affordable housing programs.
- Advocate for greater funding from the Minnesota Legislature for the Developmental Disabilities Waiver in order to eliminate the need for a wait list for services under that program.
- Ensure consistency in disability-related Housing Choice Voucher preferences across housing authorities.
- Deepen enhanced accessibility requirements for developments receiving federal financial assistance to require that 10% of units be accessible to persons with ambulatory disabilities and that 4% of units be accessible to persons with sensory disabilities.
- Increase funding and availability of Metro Mobility services.

- Encourage Metro Transit to subsidize rides of caregivers assisting riders with disabilities.
- Explore the creation of more affordable transportation options, especially outside of Minneapolis and St. Paul.
- Ensure that bus stops and curb cuts are plowed and/or shoveled after snowfall.
- Increase regional cooperation among disability service providers.
- Provide additional funding to disability support service organization to ensure recruitment and retention of qualified support staff.
- Create and invest in a relief fund for landlords and tenants to apply for rehabilitation assistance related to the cost of requested reasonable accommodations.

*Goal 6: Ensure equal access to housing for person with protected characteristics, lower-income, and homeless.*

- Implement source of income protections throughout the Region and advocate for statewide protections.
- Eliminate participation in the Crime Free Multi-Housing program by local police departments.
- For municipalities with crime-free housing and nuisance ordinances that allow for eviction based on a number of calls for emergency service or criminal activity of tenants, condition funding on the repeal of these ordinances and advocate for statewide legislation banning these ordinances. This legislation should explicitly prohibit eviction based solely on calls for emergency service, particularly for survivors of domestic violence, victims of crime, and those experiencing health emergencies.
- Require that all rental and homeownership applications be made available in Spanish, Hmong, and Somali, and ensure that paper copies are available for those without computer access.
- Ensure that housing authorities have translation services available to their customers.
- Encourage landlords to follow HUD's guidance on the use of criminal backgrounds in screening tenants.
- The St. Paul Housing Authority should eliminate the use of a policy that allows for termination without proof beyond a reasonable doubt or a report to law enforcement.
- Following Minneapolis's example, introduce and pass legislation that requires inclusive credit screening practices that do not rely on FICO scores.
- Increase the capacity of existing fair housing enforcement agencies by providing additional funding for staff.
- Provide additional funding to increase capacity and frequency of record expungement clinics.
- Following Minneapolis's example, transition from exclusively complaint-based code-enforcement services. Provide for regular code enforcement review of all rental properties as part of rental licensing restrictions.
- Monitor school redistricting policies for those that may create new or exacerbate existing segregation patterns for communities of color.
- Establish a permanent Fair Housing Advisory Committee that will participate regularly in FHIC meetings. This committee should be made up of a diverse group of community members.

- Work with the courts to ensure that they refrain from publishing evictions immediately when filed. Courts should wait to publish evictions on a tenant's record until after a judgement has been entered.
- Work with the courts to prevent evictions from remaining on a tenant's record when the eviction has been dismissed, and reduce the amount of time evictions remain on a tenant's record from 7 years to 2 years.
- Explore capping the amount of application fees private landlords may charge and the creation of a universal rental application to reduce the difficulty of applying and the amount of fees landlords are able to charge
- Restrict the ability of landlords to evict tenants during the winter months.
- Expand services and resources for homeless families.
- Partner with community based fair housing organizations to conduct regular testing of potential discriminatory steering practices by realtors.

*Goal 7: Expand access to opportunity for protected classes.*

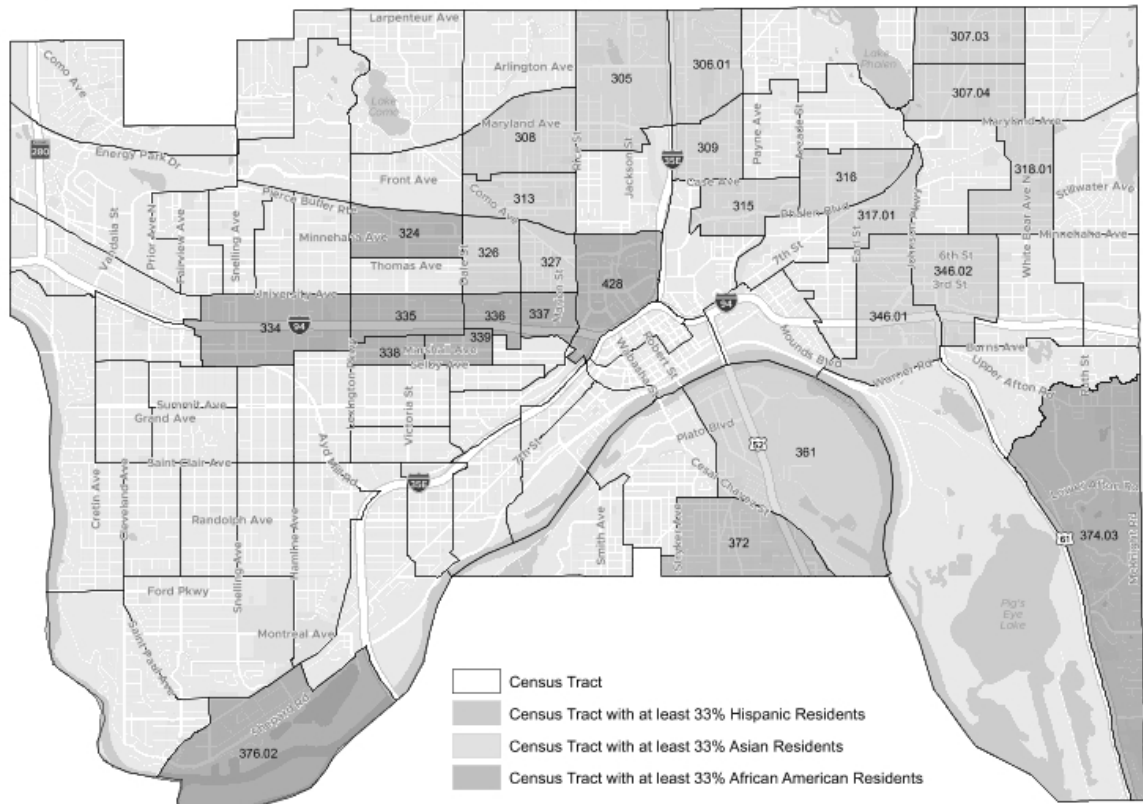
- Increase regional cooperation to encourage transit development that connects communities of protected classes to employment and reduces general transit-related isolation of these communities.
- Increase the minimum wage in the metro area to \$15 an hour.
- Enact legislation to prevent landlords from requiring excessive security deposits or multiple months' rent.
- Regularly review the screening criteria of the Region's Public Housing Authorities to ensure compliance with HUD Background Screening Guidance, including criminal backgrounds, rental history, and credit history. As mentioned above, the St. Paul Housing Authority should eliminate the current policy of allowing for termination for criminal activity when the alleged activity has not even been reported to law enforcement or proven beyond a reasonable doubt.
- Relax stringent guidelines for reasonable accommodations claims to Public Housing Authorities.
- Consult with industry experts and community groups to create a Racial Justice Framework for analysis of proposed development and siting of affordable housing.
- Provide funding and staffing for public campaigns to combat NIMBY sentiment throughout the region. These campaigns should also include content to dissuade negative notions around voucher holders.

*Goal 8: Reduce barriers to mobility.*

- Enact policies that provide for regular reviews of residency and other preferences for fair housing impacts.
- Implement selective use of payment standards based on Small Area Fair Market Rents (FMRs), to expand housing choice specifically in zip codes that are areas of opportunity. As an example, for a Minneapolis zip code, the current payment standard for a two bedroom apartment is \$1,228. For the same zip code, the Small Area FMR payment standard would be \$1,820.

- Condition the receipt of public funds for any new housing development on the acceptance of vouchers and agreement not to discriminate on the basis of an applicant's receipt of public assistance.
- Enact policies providing for regular review of landlord listing services to ensure availability of units in opportunity areas.
- Implement a fair housing auditing policy for LIHTC developments overseen by Minneapolis, St. Paul, Washington County, and Dakota County, specifically assessing voucher holder marketing and access—particularly for family LIHTC housing outside of concentrated areas.
- Expand policies providing for regular landlord/developer outreach and engagement, to encourage and support participation in the voucher program, including periodic workshops and an ongoing working group.
- Institute protocols to regularly review and report on suballocators' LIHTC performance in achieving siting balance (in designated areas of opportunity), and further incentivize development in areas of opportunity through set asides, basis boost designations, and/or increased competitive points.

### City of Saint Paul Concentrations of Disproportionately Greater Need Subpopulations

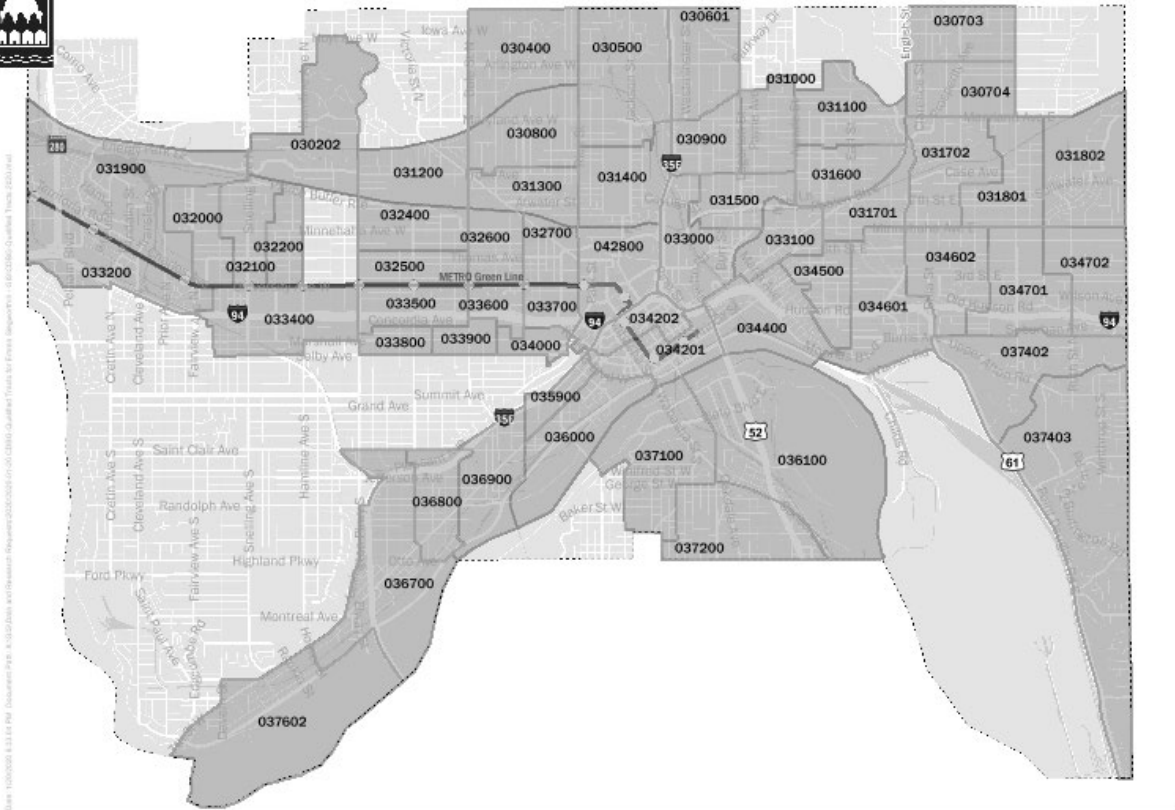


Sources: U.S. Census (2017), Metropolitan Council, Ramsey County, City of Saint Paul



# CDBG-Qualified Census Tracts 2020

January 2020



Date: 1/15/2020 8:31:44 AM. Document Path: \\spsd\share\enr\Research\Revenue\2020\2020 CDBG-Qualified Census Tracts for FY2020.dwg. User: jbruce

This document was prepared by the Saint Paul Planning and Economic Development Department and is intended to be used for reference and illustrative purposes only. This drawing is not a legally recorded plan, survey, or other land engineering information and is not intended to be used as such. Data source: St. Paul Enterprise GIS, 2019.

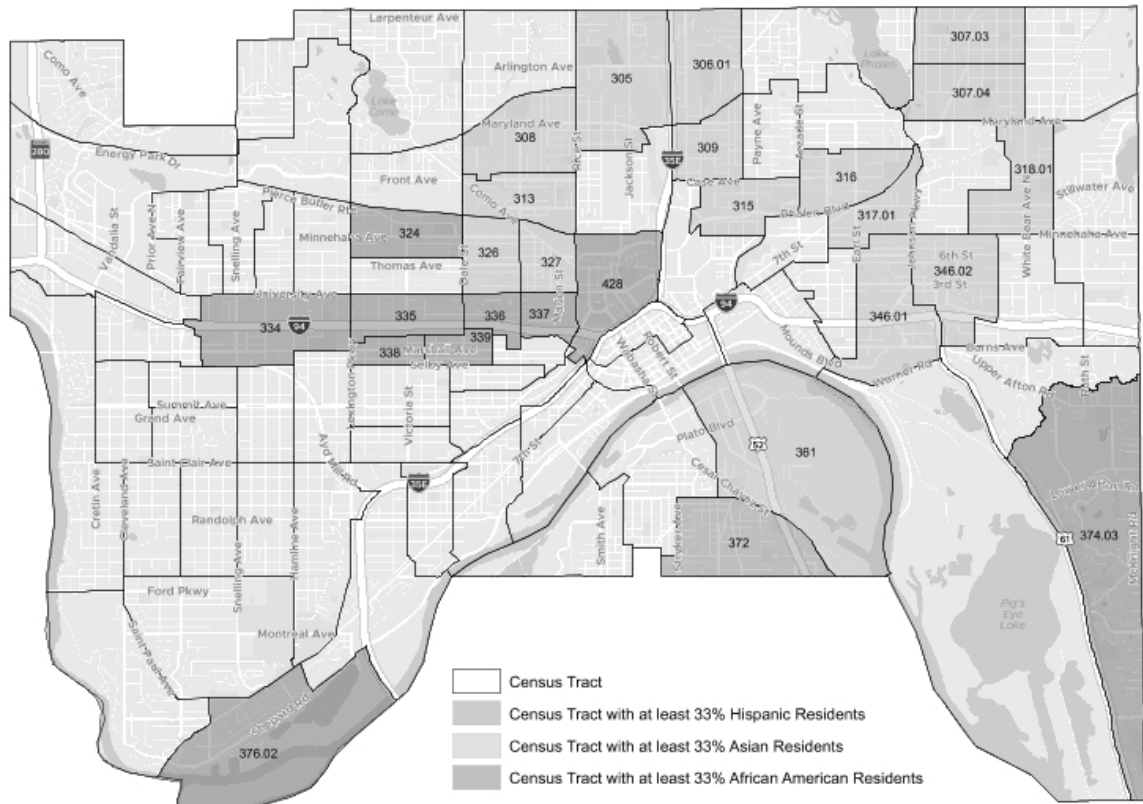


GEIOD	Tract	State ID	County ID	Low-Income Population in Tract	Total Population in Tract	% Low-Income
27123030202	302.02	27	123	1,190	2,115	56.26%
27123030400	304.00	27	123	4,900	6,620	74.02%
27123030500	305.00	27	123	4,445	5,500	80.82%
27123030601	306.01	27	123	4,600	6,005	76.60%
27123030703	307.03	27	123	2,400	3,835	62.58%
27123030704	307.04	27	123	3,070	4,360	70.41%
27123030800	308.00	27	123	3,710	5,195	71.41%
27123030900	309.00	27	123	2,815	3,715	75.77%
27123031000	310.00	27	123	3,175	4,245	74.79%
27123031100	311.00	27	123	2,755	3,945	69.84%
27123031200	312.00	27	123	1,780	3,095	57.51%
27123031300	313.00	27	123	1,890	2,410	78.42%
27123031400	314.00	27	123	2,380	2,990	79.60%
27123031500	315.00	27	123	2,015	2,605	77.35%
27123031600	316.00	27	123	3,255	4,660	69.85%
27123031701	317.01	27	123	2,315	3,010	76.91%
27123031702	317.02	27	123	5,115	6,405	79.86%
27123031801	318.01	27	123	3,430	4,760	72.06%
27123031802	318.02	27	123	2,260	3,645	62.00%
27123031900	319.00	27	123	1,505	2,135	70.49%
27123032000	320.00	27	123	2,375	3,360	70.68%
27123032100	321.00	27	123	1,365	2,475	55.15%
27123032200	322.00	27	123	1,385	2,405	57.59%
27123032400	324.00	27	123	1,700	2,745	61.93%
27123032500	325.00	27	123	3,415	4,190	81.50%
27123032600	326.00	27	123	2,800	3,620	77.35%
27123032700	327.00	27	123	2,125	2,635	80.65%
27123033000	330.00	27	123	985	1,295	76.06%
27123033100	331.00	27	123	1,160	1,375	84.36%
27123033200	332.00	27	123	1,580	2,740	57.66%
27123033400	334.00	27	123	1,960	2,480	79.03%
27123033500	335.00	27	123	2,785	3,740	74.47%
27123033600	336.00	27	123	1,575	1,605	98.13%
27123033700	337.00	27	123	1,270	1,350	94.07%
27123033800	338.00	27	123	1,625	2,190	74.20%
27123033900	339.00	27	123	1,030	1,665	61.86%
27123034000	340.00	27	123	870	1,525	57.05%
27123034201	342.01	27	123	1,280	2,045	62.59%
27123034202	342.02	27	123	2,995	5,030	59.54%
27123034400	344.00	27	123	1,675	2,090	80.14%
27123034500	345.00	27	123	3,155	4,470	70.58%
27123034601	346.01	27	123	3,370	4,895	68.85%
27123034602	346.02	27	123	3,015	4,465	67.53%
27123034701	347.01	27	123	2,985	4,620	64.61%



27123034702	347.02	27	123	2,430	3,865	62.87%
27123035900	359.00	27	123	535	715	74.83%
27123036000	360.00	27	123	1,185	2,270	52.20%
27123036100	361.00	27	123	1,375	1,595	86.21%
27123036700	367.00	27	123	2,770	4,865	56.94%
27123036800	368.00	27	123	1,190	2,280	52.19%
27123036900	369.00	27	123	1,205	1,930	62.44%
27123037100	371.00	27	123	3,580	4,950	72.32%
27123037200	372.00	27	123	4,265	5,895	72.35%
27123037402	374.02	27	123	2,220	4,125	53.82%
27123037403	374.03	27	123	3,315	6,575	50.42%
27123037602	376.02	27	123	4,040	5,680	71.13%
27123042800	428.00	27	123	1,970	2,320	84.91%

### City of Saint Paul Concentrations of Disproportionately Greater Need Subpopulations



Sources: U.S. Census (2017), Metropolitan Council, Ramsey County, City of Saint Paul



Affordable Housing Connections, Inc.  
 Summary Report to City of St. Paul on HOME Projects Inspections  
 Report Period: June 1, 2020 through May 31, 2021

41 annual reports were reviewed and 150 HOME unit tenant files were reviewed.

ID#	Project Name	Project Total Units	HOME Units Total	Fixed/Floating	Inspection Frequency	Inspection Dates		No. of Units Inspected	Physical Inspection Results	Desk Audit & Tenant File Review Results	Date Last Rent Increase Approved
						2020	2021				
1627	2703 University	248	11	Floating	every 3 years	Next Site Visit in 2021	Scheduled after May 31	-		Report review only in 2020. Corrected CHART received on 04/26/20.	07/10/21
1036	American House II	13	13	Fixed	every 2 years	06/11/20	Next Site Visit in 2022	4		Corrections for file review findings and corrected CHART received on 11/09/20.	
1015	Arlington Gardens Apartments	60	49	Fixed	annual	06/04/20	05/10/21	10	1 Unit and 1 Building Systems Findings. Completed work orders received 06/11/21.	2020: No file review findings; Corrected CHART received on 05/14/20. 2021: Corrections for file review findings and corrected. Owner did not respond to requests for files and compliance reports until late 2020. Review will be completed in 2021.	
1489	Booth Brown House	25	8	Floating	every 2 years	10/21/20	Scheduled after May 31	4			
1060	BROWhouse	35	7	Fixed	every 3 years	Next Site Visit in 2022	Next Site Visit in 2022	-			
1025	Caribic Senior Housing	113	7	Fixed	every 3 years	05/05/20	Next Site Visit in 2023	4		No file review findings. Corrected CHART received on 06/05/20.	05/10/21
1607	Compass I	45	7	Fixed	annual	06/04/20	Scheduled after May 31	4		No file review findings. Corrected CHART received on 04/24/20.	
1242	Corvick House	47	13	Floating	annual	06/22/20	Scheduled after May 31	4		No file review findings; No report findings.	12/01/20
1312	Crane Ordway	70	18	Floating	annual	06/16/20	Scheduled after May 31	4		No file review findings; No report findings.	06/25/19
1106	Crossview Community Expansion	44	11	Floating	annual	07/22/20	Scheduled after May 31	4		Corrections for file review findings and corrected CHART received on 09/29/20.	05/21/19
1539	Delaney Apartments	37	13	Fixed	annual	06/23/20	Scheduled after May 31	4		Corrections for file review findings and corrected CHART received on 09/23/20.	03/09/20
1012	Dixons Lodge	43	17	Floating	annual	07/29/20	Scheduled after May 31	4		Corrections for file review findings and corrected CHART received on 11/09/20.	
1165	Goshorn Place	121	8	Fixed	annual	06/13/20	Scheduled after May 31	4		No file review findings; No report findings.	06/21/21
1622	Hamline Station East	51	5	Floating	annual	07/22/20	Scheduled after May 31	4		Corrections for file review findings received on 12/22/20 and corrected CHART received on 04/08/20.	
1621	Hamline Station West	57	5	Floating	annual	07/22/20	Scheduled after May 31	4		Corrections for file review findings received on 12/22/20 and corrected CHART received on 04/08/20.	10/21/19
1117	Harbort Bluff Landing	16	2	Floating	every 2 years	07/26/20	Next Site Visit in 2022	2		No file review findings; No report findings.	04/09/18
843	Idaho Ridge Townhomes	16	7	Floating	every 2 years	10/08/20	Next Site Visit in 2022	4		Corrections for file review findings and corrected CHART received on 11/05/20.	06/03/21
1014	Jackson Street Village	24	8	Floating	every 2 years	Next Site Visit in 2021	Scheduled after May 31	-			07/03/19
1603	Kimball Court	76	15	Floating	annual	06/04/20	Scheduled after May 31	4		Corrections for file review findings and corrected CHART received on 04/09/20.	03/11/18

41 annual reports were reviewed and 150 HOME unit tenant files were reviewed.

IDIS No.	Project Name	Project Total Units	HOME Units Total	Fixed/Floating	Inspection Frequency	Inspection Dates		No. of Units Inspected	Physical Inspection Results	Desk Audit & Tenant File Review Results	Date Last Rent Increase Approved
						2020	2021				
1224	Lyon's Court	60	3	Fixed	annual	07/15/20	Scheduled after May 31	3		No file review findings; No report findings.	11/12/20
1685	Maryland Park Apartments	172	6	Fixed	annual	06/15/20	Scheduled after May 31	4		Corrections for file review findings and corrected CHART received on 10/27/20	
1611	Midway Pointe	50	4	Fixed	annual	06/22/20	Scheduled after May 31	4		No file review findings; No report findings.	02/10/20
1307	Model Class FF5H	6	5	Floating	every 2 years	Next Site Visit in 2021	Scheduled after May 31	-			
1760	Norham Warehouse	82	5	Fixed	annual	07/28/20	Scheduled after May 31	4		No file review findings; No report findings.	04/05/18
1253	Phalan Senior Lofts	73	35	Floating	annual	07/12/20	Scheduled after May 31	7		No file review findings; No report findings.	11/12/20
1058	Pine Crossing	44	5	Floating	every 3 years	07/22/20	Next Site Visit in 2023	4		Corrections for file review findings and corrected CHART received on 03/29/20	
1605	Renaissance Spa	70	4	Floating	annual	06/16/20	Scheduled after May 31	4		No file review findings; No report findings.	01/12/18
1616	Rolling Hills Apartments	108	8	Fixed	annual	06/09/20	Scheduled after May 31	4		No file review findings; No report findings.	03/15/20
1603	Seabury	50	49	Fixed	annual	06/22/20	Scheduled after May 31	10		No file review findings; No report findings.	07/03/12
PI 001	Selby Grots Apartments	40	3	Floating	annual	06/02/20	Scheduled after May 31	3		No file review findings; No report findings.	05/19/18
2138	Selby Milton Victoria Apartments	34	2	Fixed	every 3 years	07/29/20	Next Site Visit in 2023	2		No file review findings; No report findings.	
1601	Seventh Landing	13	12	Fixed	every 2 years	Next Site Visit in 2021	Scheduled after May 31	-			04/03/19
947	Sibley Park Apartments	114	23	Floating	annual	06/16/20	Scheduled after May 31	5		Corrections for file review findings and corrected CHART received on 07/01/20. Clarification for DR finding on 06/03/20 Report to PJ provided on 11/02/20.	10/31/19
1696	Terrace (Kubashai/McLear)	35	17	Fixed	annual	07/28/20	Scheduled after May 31	4		No file review findings. Corrected CHART received on 09/29/20.	04/05/18
2138	Thomas Avenue Flats	51	7	Fixed	every 3 years	05/06/20	Next Site Visit in 2023	5		File review finding clarified on 06/06/20. No report findings.	06/22/20
1744	West Side Flats	178	17	Fixed	annual	07/13/20	Scheduled after May 31	4		No file review findings; No report findings.	11/12/20
1914	Wisdom U Plaza	60	2	Fixed	annual	06/30/20	Scheduled after May 31	2		No file review findings; No report findings.	03/10/20
1526	Whispering Apartments	56	5	Floating	annual	06/02/20	Scheduled after May 31	4		No file review findings. Corrected CHART received on 09/22/20.	05/19/18
1366	WVCA-Grots	8	2	Floating	every 2 years	Next Site Visit in 2021	05/26/21	2	No Findings.	No file review findings; No report findings.	10/31/17
1285	WVCA-Oakford	12	12	Fixed	every 2 years	Next Site Visit in 2021	05/26/21	4	1 unit finding. Completed work order received 06/29/21.	No file review findings; No report findings.	10/31/17
1165	WVCA-Supp Lexington	16	3	Fixed	every 2 years	Next Site Visit in 2021	05/26/21	5	No Findings.	No file review findings; No report findings.	10/31/17

# CITIZEN PARTICIPATION PLAN - Amended

CITY OF SAINT PAUL  
1100 CITY HALL ANNEX  
425 WEST FOURTH STREET  
SAINT PAUL, MN 55102



**SAINT PAUL  
MINNESOTA**

Building community  
wealth through  
business, housing,  
jobs, planning,  
financial and cultural  
assets.

# City of Saint Paul

## Citizen Participation Plan

As required by the U.S. Department of Housing and Urban Development (HUD) regulations found at 24 CFR 91.105, this Citizen Participation Plan sets for the City of Saint Paul's policies and procedures for providing citizens and other interested parties with opportunities to participate in an advisory role in the planning, implementation, and evaluation of the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) programs. The City receives CDBG, HOME, and ESG funds annually from HUD, and these programs are administered through the Department of Planning and Economic Development.

The objective of the CDBG program is the development of viable urban communities by providing decent housing and suitable living environment and expanding economic opportunities. The CDBG program has a focus on low- and moderate-income persons and households earning less than 80% of the Area Median Income, or in predominately low- and moderate-income census tracts. The objective of the HOME program is to provide, develop, support, produce, and expand the supply of decent and affordable housing to serve low- and very low-income persons. The objective of the ESG program is to prevent homelessness and assist those already homeless.

As an entitlement community and recipient of CDBG, HOME, and ESG funds, the City is required to produce the following documents:

1. Consolidated Plan (Con Plan) – a five-year plan that documents the City of Saint Paul's housing and community development needs, outlines strategies to address those needs, and identifies proposed program accomplishments.
2. Annual Action Plan (AAP) – an annual plan that describes specific CDBG, HOME, and ESG projects and programs that will be undertaken over the course of the fiscal year.
3. Consolidated Annual Performance and Evaluation Report (CAPER) – an annual report that evaluates the City's accomplishments and use of CDBG, HOME, and ESG funds.

The primary objectives of the Citizen Participation Plan are to:

1. Encourage citizen participation by all Saint Paul citizens in the development of the Consolidated Plan, Annual Action Plans, and CAPERs, emphasizing the involvement of low- and moderate-income residents, people living in CDBG target neighborhoods, people with disabilities, minorities, non-English speakers, and residents of assisted housing.
2. Give all citizens reasonable and timely access to meetings, information, and records related to the City's CDBG, HOME, and ESG programs.
3. Give all citizens the opportunity to identify and respond to proposed uses of funds.
4. Give all citizens the opportunity to review and comment on program performance.

This Citizen Participation Plan, together with other materials relating to the City's CDBG, HOME, and ESG programs, are available on the City's website (which can be translated) and in alternative formats for persons with disabilities. For information, contact the Department of Planning and Economic Development at 651-266-6575.

Amended January 12, 2021

#### Capital Improvement Budget (CIB) Committee

The Saint Paul Capital Improvement Budget (CIB) process is designed to engage the public in evaluating capital needs in the City. As a part of this process, the CIB Committee, 18 Saint Paul residents representing each of the Minnesota senate districts located in Saint Paul, are involved with the annual allocation of the CDBG funds. These residents are charged with hearing project proposal presentations, scoring projects, and offering comments. A public hearing is held during the CIB funding cycle to solicit comments regarding funding selection and priorities prior to the Committee making its formal recommendations. The CIB Committee's recommendations are presented to the Mayor and Council and are the basis for the selection of projects and programs funded with CDBG funds.

#### Public Hearings

The City will hold at least two public hearings each year to obtain citizen's views about housing and community development needs, proposed uses of funds and review of program performance. At least one public hearing will be held to obtain the views of citizens before the Consolidated Plan is published for comment.

The City will ensure adequate public notice before each public hearing, with sufficient information published about the subject of the hearing to facilitate informed comment. Public hearings will be announced online, via the City's Early Notification System, and in the Saint Paul City Council designated legal newspaper of general circulation. Public notice will be given at least two weeks before a public hearing or public meeting is held.

The City will hold all public hearings at times and location accessible to potential and actual beneficiaries. Reasonable accommodations will be made for people with disabilities upon advance request. Interpretation services for non-English speaking citizens will be provided at public hearings upon advance request, provided such services are available.

If a public hearing is required and if in-person public hearings are not feasible due to health and safety concerns for citizens, virtual public hearings that provide reasonable notification and access for citizens will be held.

#### Development of the Consolidated Plan and Annual Action Plans

The City will make a concerted effort to notify residents, state and local health service providers, social service providers, fair housing organizations, state and local governments, public housing agencies, affordable housing developers, businesses, community and faith based organizations, and other stakeholders of the development of the Consolidated Plan and Annual Action Plans through email, online postings, and public notices in the Saint Paul City Council designated legal newspaper of general circulation.

The City will conduct public open houses at convenient times and locations to inform and educate citizens on the development of the Consolidated Plan and Annual Action Plans as well as solicit input for the plans. Reasonable accommodations will be made for people with disabilities upon advance request. Interpretation services for non-English speaking residents will be provided at public hearings upon advance request, provided such services are available. The City also will solicit input from residents and stakeholders through online surveys, phone calls, focus groups, and interviews. Interpretation services for non-English speaking residents at public hearings and public meetings upon advance request, provided such services are available.

Amended January 12, 2021

The City will also offer to attend a standing District Council Board of Directors or Committee meeting to inform members about the plans, answer questions, and solicit input regarding community needs. The District Councils are resident groups that engage and represent the people living in the district and the Board of Directors and Committees are made up of volunteers elected by the neighborhoods' residents.

The City invites proposals applying for CDBG funding through the CIB process. The CIB Committee hears proposal presentations, score projects, and provides recommendations to the Mayor and Council which are the basis for the selection of projects and programs funded with CDBG funds. The Saint Paul Housing and Redevelopment Authority (HRA) accepts applications for HOME funding, along with other federal and local sources, through an open pipeline process. Applications are reviewed by housing staff for each individual project prior to a funding recommendation. Ramsey County Continuum of Care, in conjunction with Ramsey County and the City, will issue a Request for Proposals (RFP) on an annual basis for projects applying for ESG funding.

The City will publish its draft Consolidated Plan and Annual Action Plans for review and comment on the City's website. The City will publish public notices in the Saint Paul City Council designated legal newspaper of general circulation describing the purpose of the Consolidated Plan and Annual Action Plans and listing the locations where the plans may be examined. The Plans will be available for review at the Department of Planning and Economic Development, on its website, and at the Saint Paul Public Library Bookmobile. Posters requesting feedback will be displayed, and written instruction for accessing an online copy will be made available, at all Saint Paul public library branches and the Bookmobile (14 sites in all). Saint Paul public libraries do not require a library card to access public library computers.

Before the City adopts the Consolidated Plan or Annual Action Plans, the City will make available to residents and other interested stakeholders information that includes the amount of funds the City expects to receive and the range of activities that may be undertaken that will benefit low- and moderate-income citizens.

The City will receive and consider written comments on the draft Consolidated Plan and Annual Action Plans for a minimum period of 30 day and shall hold public hearings prior to adopting the final Consolidated Plan and Annual Action Plans and final acceptance by City Council.

#### Substantial Amendments to the Consolidated Plan and Annual Action Plans

In accordance with 24 CFR 91.505, the City of Saint Paul has developed criteria to be used to determine what changes in HUD funding constitutes a substantial amendment, and therefore requires an amendment to the City's Consolidated Plan. These basic criteria, except for the expedited Citizen Participation process, have been incorporated since the City began receiving CDBG program funding, originally included as criteria for amendments to the City's Capital Improvement Budget Program and Process. These criteria were originally more stringent than federal requirements. The PED Grants Management division of the City of Saint Paul has determined that the following actions will be considered substantial amendments to its HUD-funded programs:

- The addition of a project not described in the Consolidated Plan;
- The cancellation of a project described in the Consolidated Plan;

Amended January 12, 2021



- An increase in the amount to be expended for a project, if the increase is greater than \$50,000 and also exceeds 25 percent of the amount originally appropriated for the project;
- A change in the location of any public improvement or public facility described in the Consolidated Plan;
- A change in any project that will affect a majority of the intended beneficiaries or a majority of the planned activities.
- A change in the Citizen Participation Plan process, in accordance with 24 CFR §91.105(c), to establish expedited procedures to draft, propose, or amended consolidated plans when necessary to expedite or facilitate the use of grant funds as allowed under the CARES Act.

If a substantial amendment is made, the City will follow all applicable HUD rules, as prescribed in the federal regulations. The City may also utilize an expedited procedure to draft, propose, or amend consolidated plans when necessary to expedite or facilitate the use of grant funds. When utilizing the expedited procedure to draft, propose, or amend consolidated plans for this purpose a public notice will be published in the Saint Paul City Council designated legal newspaper of general circulation. This public notice will clearly state: that the expedited procedures are being used; shall include reasonable opportunity to comment of no less than five (5) days; provide citizens with access to action plan amendments and/or amended citizen participation plans, as applicable, on the City's website [<https://www.stpaul.gov/conplan>]; and clearly note that comments will be received through e-mail, telephone, or U.S. postal mail post-marked up to the stated date and time in the public notice. The City may also utilize written comments on the substantial amendment which will be reviewed by City staff, the Mayor, and City Council before the decision to implement the amendment is made.

#### Consolidated Annual Performance and Evaluation Reports (CAPERs)

The City will prepare a CAPER each year to notify citizens of the accomplishments of the previous program year and the progress made toward meeting the Consolidated Plan goals in accordance with HUD requirements. Citizens will receive notice of the CAPER through online postings and public notices in the Saint Paul City Council designated legal newspaper of general circulation. The CAPER will be available for review at the Department of Planning and Economic Development, on its website, and at the Saint Paul Public Library Bookmobile. Posters requesting feedback will be displayed, and written instruction for accessing an online copy will be made available, at all Saint Paul public library branches and the bookmobile (14 sites in all). Saint Paul public libraries do not require a library card to access public library computers. The City will receive and consider comments on the CAPER for 15 days before the public hearing to authorize submission of the report to HUD.

#### Access to Information and Records

Any resident, organization, or other interested party may submit written requests for information regarding the Consolidated Plan, Annual Action Plans and CAPERs, including the City's use of funds under the CDBG, HOME, and ESG programs. This Citizen Participation Plan, the Consolidated Plan, the current Annual Action Plan, the current CAPER, and any substantial amendments to these plans will be available for public review at the Department of Planning and Economic Development and on its website.

#### Comments, Complaints, and Appeals

Amended January 12, 2021

The City is responsible for carrying out the development and implementation of the Annual Action Plans. Any person wishing to file a complaint regarding the Consolidated Plan, Annual Action Plans, amendments, and/or CAPERs may do so in writing to:

City of Saint Paul  
Planning and Economic Development Department  
Beth Ulrich, Grants Manager  
1100 City Hall Annex  
25 West Fourth Street  
Saint Paul, MN 55102  
[beth.ulrich@ci.stpaul.mn.us](mailto:beth.ulrich@ci.stpaul.mn.us)

The City shall respond to the complaint within 15 days of receipt of the complaint or within 5 days when the City is using an expedited process. All complaints and responses will be maintained for at least six (6) years. Accommodations and/or alternative filing methods will be allowed for persons with disabilities.

All records regarding the adopted Consolidated Plan, Annual Action Plan, Substantial Amendments, and CAPERs, along with use of funds and performance measurements are retained for a minimum of six (6) years at the above address. All residents or interested parties will be given reasonable access to these records upon request.

Amended January 12, 2021



PART I: SUMMARY OF CDBG RESOURCES	
01 UNEXPENDED CDBG FUNDS AT END OF PREVIOUS PROGRAM YEAR	11,666,147.40
02 ENTITLEMENT GRANT	6,969,836.00
03 SURPLUS URBAN RENEWAL	0.00
04 SECTION 108 GUARANTEED LOAN FUNDS	0.00
05 CURRENT YEAR PROGRAM INCOME	4,153,676.30
05a CURRENT YEAR SECTION 108 PROGRAM INCOME (FOR SI TYPE)	0.00
06 FUNDS RETURNED TO THE LINE-OF-CREDIT	0.00
06a FUNDS RETURNED TO THE LOCAL CDBG ACCOUNT	0.00
07 ADJUSTMENT TO COMPUTE TOTAL AVAILABLE	0.00
08 TOTAL AVAILABLE (SUM, LINES 01-07)	22,789,661.70
PART II: SUMMARY OF CDBG EXPENDITURES	
09 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION	3,755,144.21
10 ADJUSTMENT TO COMPUTE TOTAL AMOUNT SUBJECT TO LOW/MOD BENEFIT	0.00
11 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 09 + LINE 10)	3,755,144.21
12 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	1,441,904.18
13 DISBURSED IN IDIS FOR SECTION 108 REPAYMENTS	0.00
14 ADJUSTMENT TO COMPUTE TOTAL EXPENDITURES	0.00
15 TOTAL EXPENDITURES (SUM, LINES 11-14)	5,197,048.39
16 UNEXPENDED BALANCE (LINE 08 - LINE 15)	17,592,613.31
PART III: LOW/MOD BENEFIT THIS REPORTING PERIOD	
17 EXPENDED FOR LOW/MOD HOUSING IN SPECIAL AREAS	0.00
18 EXPENDED FOR LOW/MOD MULTI-UNIT HOUSING	108,582.26
19 DISBURSED FOR OTHER LOW/MOD ACTIVITIES	1,326,362.45
20 ADJUSTMENT TO COMPUTE TOTAL LOW/MOD CREDIT	0.00
21 TOTAL LOW/MOD CREDIT (SUM, LINES 17-20)	1,434,944.71
22 PERCENT LOW/MOD CREDIT (LINE 21/LINE 11)	38.21%
LOW/MOD BENEFIT FOR MULTI-YEAR CERTIFICATIONS	
23 PROGRAM YEARS(PY) COVERED IN CERTIFICATION	FY: 2020 PY: 2021 PY: 2022
24 CUMULATIVE NET EXPENDITURES SUBJECT TO LOW/MOD BENEFIT CALCULATION	10,243,195.80
25 CUMULATIVE EXPENDITURES BENEFITING LOW/MOD PERSONS	7,678,664.99
26 PERCENT BENEFIT TO LOW/MOD PERSONS (LINE 25/LINE 24)	74.96%
PART IV: PUBLIC SERVICE (PS) CAP CALCULATIONS	
27 DISBURSED IN IDIS FOR PUBLIC SERVICES	810,896.70
28 PS UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	561,401.12
29 PS UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	385,509.82
30 ADJUSTMENT TO COMPUTE TOTAL PS OBLIGATIONS	0.00
31 TOTAL PS OBLIGATIONS (LINE 27 + LINE 28 - LINE 29 + LINE 30)	1,006,797.00
32 ENTITLEMENT GRANT	6,969,836.00
33 PRIOR YEAR PROGRAM INCOME	2,151,054.99
34 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PS CAP	0.00
35 TOTAL SUBJECT TO PS CAP (SUM, LINES 32-34)	9,128,682.99
36 PERCENT FUNDS OBLIGATED FOR PS ACTIVITIES (LINE 31/LINE 35)	11.04%
PART V: PLANNING AND ADMINISTRATION (PA) CAP	
37 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	1,441,904.18
38 PA UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	3,300,910.13
39 PA UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	3,105,679.80
40 ADJUSTMENT TO COMPUTE TOTAL PA OBLIGATIONS	0.00
41 TOTAL PA OBLIGATIONS (LINE 37 + LINE 38 - LINE 39 +LINE 40)	1,577,134.51
42 ENTITLEMENT GRANT	6,969,836.00
43 CURRENT YEAR PROGRAM INCOME	4,153,676.30
44 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PA CAP	0.00
45 TOTAL SUBJECT TO PA CAP (SUM, LINES 42-44)	11,123,514.30
46 PERCENT FUNDS OBLIGATED FOR PA ACTIVITIES (LINE 41/LINE 45)	14.18%



Office of Community Planning and Development  
 U.S. Department of Housing and Urban Development  
 Integrated Disbursement and Information System  
 PR25 - CDBG Financial Summary Report  
 Program Year 2021  
 ST. PAUL, MN

DATE: 07-27-22  
 TIME: 14:44  
 PAGE: 2

LINE 17 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 17  
 Report returned no data.

LINE 18 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 18

Plan Year	IDIS Project	IDIS Activity	Activity Name	Matrix Code	National Objective	Drawn Amount
2017	2	2134	650-658 Sherburne	01	LWH	\$108,582.26
				01	Matrix Code	\$108,582.26
<b>Total</b>						<b>\$108,582.26</b>

LINE 19 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 19

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2018	11	2149	6601195	Eastview Play Area	03F	LMA	\$14,329.76
2020	10	2308	6601195	Hamline Park Play Area	03F	LMA	\$233,074.38
					03F	Matrix Code	\$247,404.14
2019	3	2293	6549107	2019 Pre-Court Diversion	05D	LWC	\$15,054.28
2020	3	2375	6559108	2020 Pre-Charge Diversion Program	05D	LWC	\$36,141.00
					05D	Matrix Code	\$51,195.28
2020	3	2376	6584705	Saint Paul Ramsey County Domestic Abuse Intervention Project	05G	LWC	\$50,736.75
					05G	Matrix Code	\$50,736.75
2021	3	2374	6584705	Saint Paul Building Green Apprenticeship Readiness Pilot	05H	LWC	\$12,744.63
2021	3	2374	6601195	Saint Paul Building Green Apprenticeship Readiness Pilot	05H	LWC	\$17,478.84
2021	3	2374	6614860	Saint Paul Building Green Apprenticeship Readiness Pilot	05H	LWC	\$7,030.02
2021	5	2392	6601195	2021 Capital City Youth Employment	05H	LWC	\$371,000.00
					05H	Matrix Code	\$408,253.49
2020	4	2337	6549107	2021 District 1 Community Engagement	05I	LMA	\$8,523.51
2020	4	2337	6584705	2021 District 1 Community Engagement	05I	LMA	\$7,161.36
2020	4	2337	6614860	2021 District 1 Community Engagement	05I	LMA	\$7,522.85
2020	4	2339	6524008	2021 District 3 Community Engagement	05I	LMA	\$24,379.17
2020	4	2339	6601901	2021 District 3 Community Engagement	05I	LMA	\$10,596.46
2020	4	2340	6513204	2021 District 4 Community Engagement	05I	LMA	\$11,445.00
2020	4	2340	6524008	2021 District 4 Community Engagement	05I	LMA	\$1,170.00
2020	4	2340	6559108	2021 District 4 Community Engagement	05I	LMA	\$1,800.00
2020	4	2341	6601901	2021 District 5 Community Engagement	05I	LMA	\$6.55
2020	4	2342	6513204	2021 District 6 Community Engagement	05I	LMA	\$5,669.76
2020	4	2342	6524008	2021 District 6 Community Engagement	05I	LMA	\$7,890.07
2020	4	2342	6532537	2021 District 6 Community Engagement	05I	LMA	\$2,306.66
2020	4	2342	6549107	2021 District 6 Community Engagement	05I	LMA	\$4.85
2020	4	2343	6614860	2021 District 7 Community Engagement	05I	LMA	\$35,000.00
2020	4	2344	6559108	2021 District 8 Community Engagement	05I	LMA	\$35,000.00
2020	4	2345	6549107	2021 District 11 Community Engagement	05I	LMA	\$10,761.06
2020	4	2346	6519990	2021 District 17 Community Engagement	05I	LMA	\$8,769.25
2020	4	2346	6549107	2021 District 17 Community Engagement	05I	LMA	\$8,769.25
2020	4	2346	6571526	2021 District 17 Community Engagement	05I	LMA	\$7,015.40
2020	4	2346	6584705	2021 District 17 Community Engagement	05I	LMA	\$1,938.40
2021	4	2409	6621511	2022 District 2 Community Engagement	05I	LMA	\$6,355.58
2021	4	2413	6626663	2022 District 6 Community Engagement	05I	LMA	\$15,538.00
					05I	Matrix Code	\$217,713.18
2020	3	2299	6559108	2020 Block Nurse Program	05M	LWC	\$54,250.00
2020	3	2299	6584705	2020 Block Nurse Program	05M	LWC	\$28,750.00
					05M	Matrix Code	\$83,000.00
2017	9	2085	6549107	HSP Restore Saint Paul Commercial Facade Program	14E	LWJ	\$645.32
2019	9	2227	6549107	949 W 7th (Joe & Stan's)	14E	LMA	\$24,946.34
2019	9	2241	6559108	754 Randolph (Fire House #10)	14E	LWJ	\$25,000.00
2019	9	2368	6549107	879 Rice Street (Smokin' Ninjas)	14E	LWJ	\$12,304.17
2019	9	2369	6540107	1046 Rice Street (Hunter Boy's Southern BBQ)	14E	LWJ	\$2,705.00
2020	9	2309	6626663	HSP: Restore St. Paul	14E	LMA	\$8,432.13
2020	9	2309	6630333	HSP: Restore St. Paul	14E	LMA	\$4,915.87
2020	9	2323	6513204	441 Robert Street S. (Michael's Pizza)	14E	LMA	\$38,620.00
2020	9	2364	6524008	1090-1092 Payne Ave (Twyla's / Family Options)	14E	LMA	\$26,131.50
2020	9	2364	6584705	1090-1092 Payne Ave (Twyla's / Family Options)	14E	LMA	\$24,868.50
2020	9	2365	6584705	927 Payne Avenue (Hamburguesas El Gordo)	14E	LWJ	\$3,157.50
2020	9	2390	6550108	581 7th Street E (Gregg's Auto Body)	14E	LMA	\$10,600.00
2020	9	2399	6626663	637 Smith Avenue (Capital View Cafe)	14E	LWJ	\$30,630.42
2020	9	2400	6626663	913 Payne Ave (Gentlemen Cuts)	14E	LMA	\$3,024.00
2021	9	2419	6626663	202 Cesar Chavez St. (Papa Legba)	14E	LWJ	\$25,000.00
					14E	Matrix Code	\$240,980.75
2019	9	2247	6513204	ESNDC District del Sol Rejuvenation	18A	LMA	\$3,848.00



Office of Community Planning and Development  
 U.S. Department of Housing and Urban Development  
 Integrated Disbursement and Information System  
 FR25 - CDBG Financial Summary Report  
 Program Year 2021  
 ST. PAUL, MN

DATE: 07-27-22  
 TIME: 14:44  
 PAGE: 3

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2019	9	2248	6549107	ESNDC North End Facade Improvement 2019	18A	LMA	\$2,104.34
2020	9	2305	6524008	ESNDC: Payne Ave BIF	18A	LMA	\$5,280.00
2020	9	2305	6559108	ESNDC: Payne Ave BIF	18A	LMA	\$2,420.00
2020	9	2305	6584705	ESNDC: Payne Ave BIF	18A	LMA	\$5,060.00
2020	9	2305	6626663	ESNDC: Payne Ave BIF	18A	LMA	\$1,364.00
2020	9	2310	6626663	NeDA: West Side Commercial	18A	LMA	\$3,051.62
2021	9	2384	6626663	2021 NeOA : West Side Commercial Rehab	18A	LMA	\$3,950.90
							\$27,078.86
<b>Total</b>							<b>\$1,326,362.45</b>

LINE 27 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 27

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity to prevent, prepare for, and respond to Coronavirus	Activity Name	Grant Number	Fund Type	Matrix Code	National Objective	Drawn Amount
2019	3	2293	6549107	No	2019 Pre-Court Diversion	B19MC270007	EN	05D	LWC	\$15,054.28
2020	3	2375	6559108	No	2020 Pre-Charge Diversion Program	B20MC270007	EN	05D	LWC	\$36,141.00
										\$51,195.28
2020	3	2376	6584705	No	Saint Paul Ramsey County Domestic Abuse Intervention Project	B20MC270007	EN	05G	LWC	\$16,912.25
2020	3	2376	6584705	No	Saint Paul Ramsey County Domestic Abuse Intervention Project	B21MC270007	PI	05G	LWC	\$33,824.50
										\$50,736.75
2021	3	2374	6584705	No	Saint Paul Building Green Apprenticeship Readiness Pilot	B18MC270007	EN	05H	LWC	\$12,744.63
2021	3	2374	6601195	No	Saint Paul Building Green Apprenticeship Readiness Pilot	B18MC270007	EN	05H	LWC	\$17,478.84
2021	3	2374	6614860	No	Saint Paul Building Green Apprenticeship Readiness Pilot	B18MC270007	EN	05H	LWC	\$7,030.02
2021	5	2392	6601195	No	2021 Capitol City Youth Employment	B21MC270007	EN	05H	LWC	\$299,111.20
2021	5	2392	6601195	No	2021 Capitol City Youth Employment	B21MC270007	PI	05H	LWC	\$71,888.00
										\$408,253.49
2020	4	2337	6549107	No	2021 District 1 Community Engagement	B20MC270007	EN	05I	LMA	\$8,523.51
2020	4	2337	6584705	No	2021 District 1 Community Engagement	B20MC270007	EN	05I	LMA	\$7,161.35
2020	4	2337	6614860	No	2021 District 1 Community Engagement	B20MC270007	EN	05I	LMA	\$7,522.85
2020	4	2339	6524008	No	2021 District 3 Community Engagement	B20MC270007	EN	05I	LMA	\$24,379.17
2020	4	2339	6601901	No	2021 District 3 Community Engagement	B20MC270007	EN	05I	LMA	\$10,595.45
2020	4	2340	6513204	No	2021 District 4 Community Engagement	B20MC270007	EN	05I	LMA	\$11,445.00
2020	4	2340	6524008	No	2021 District 4 Community Engagement	B20MC270007	EN	05I	LMA	\$1,170.00
2020	4	2340	6559108	No	2021 District 4 Community Engagement	B20MC270007	EN	05I	LMA	\$1,800.00
2020	4	2341	6601901	No	2021 District 5 Community Engagement	B20MC270007	EN	05I	LMA	\$6.55
2020	4	2342	6513204	No	2021 District 6 Community Engagement	B20MC270007	EN	05I	LMA	\$5,869.76
2020	4	2342	6524008	No	2021 District 6 Community Engagement	B20MC270007	EN	05I	LMA	\$7,880.07
2020	4	2342	6532537	No	2021 District 6 Community Engagement	B20MC270007	EN	05I	LMA	\$2,396.66
2020	4	2342	6549107	No	2021 District 6 Community Engagement	B20MC270007	EN	05I	LMA	\$4.85
2020	4	2343	6614860	No	2021 District 7 Community Engagement	B20MC270007	EN	05I	LMA	\$35,000.00
2020	4	2344	6559108	No	2021 District 8 Community Engagement	B20MC270007	EN	05I	LMA	\$35,000.00
2020	4	2345	6549107	No	2021 District 11 Community Engagement	B20MC270007	EN	05I	LMA	\$10,781.05
2020	4	2346	6519990	No	2021 District 17 Community Engagement	B20MC270007	EN	05I	LMA	\$8,769.25
2020	4	2346	6549107	No	2021 District 17 Community Engagement	B20MC270007	EN	05I	LMA	\$8,769.25
2020	4	2346	6571526	No	2021 District 17 Community Engagement	B20MC270007	EN	05I	LMA	\$7,015.40
2020	4	2348	6584705	No	2021 District 17 Community Engagement	B20MC270007	EN	05I	LMA	\$1,938.40
2021	4	2409	6652151	No	2022 District 2 Community Engagement	B21MC270007	PI	05I	LMA	\$6,355.58
2021	4	2413	6626663	No	2022 District 8 Community Engagement	B21MC270007	EN	05I	LMA	\$15,538.00
										\$217,713.18
2020	3	2299	6559108	No	2020 Block Nurse Program	B20MC270007	EN	05M	LWC	\$64,250.00
2020	3	2299	6584705	No	2020 Block Nurse Program	B20MC270007	EN	05M	LWC	\$28,750.00
										\$93,000.00
										\$810,898.70
<b>Total</b>										<b>\$810,898.70</b>

LINE 37 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 37

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2020	12	2307	6549107	2020 Planning Admin	20		\$29,722.29
							\$29,722.29
2018	12	2153	6513204	General Administration	21A	Matrix Code	\$59,345.19
2018	12	2153	6519990	General Administration	21A		\$695.00
2018	12	2153	6524008	General Administration	21A		\$366.52
2018	12	2153	6532537	General Administration	21A		\$62,273.33
2018	12	2153	6549107	General Administration	21A		\$87,577.66



Office of Community Planning and Development  
 U.S. Department of Housing and Urban Development  
 Integrated Disbursement and Information System  
 FR25 - CDBG Financial Summary Report  
 Program Year 2021  
 ST. PAUL , MN

DATE: 07-27-22  
 TIME: 14:44  
 PAGE: 4

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2018	12	2153	6550108	General Administration	21A		\$2,891.00
2018	12	2153	6571526	General Administration	21A		\$1,646.00
2018	12	2153	6584705	General Administration	21A		\$1,402.00
2018	12	2153	6601195	General Administration	21A		\$457.50
2019	10	2250	6532537	2019 General Admin	21A		\$3,272.50
2019	10	2250	6549107	2019 General Admin	21A		\$63,205.48
2019	10	2250	6559108	2019 General Admin	21A		\$78,003.19
2019	10	2250	6571526	2019 General Admin	21A		\$72,618.16
2019	10	2250	6584705	2019 General Admin	21A		\$181,439.25
2019	10	2250	6601195	2019 General Admin	21A		\$110,440.60
2019	10	2250	6614860	2019 General Admin	21A		\$96,621.21
2019	10	2250	6618502	2019 General Admin	21A		\$20,752.64
2019	10	2250	6626663	2019 General Admin	21A		\$121,001.30
2019	10	2250	6652151	2019 General Admin	21A		\$108.98
2019	10	2256	6513204	Planning Admin 2019	21A		\$20,413.34
2019	10	2256	6532537	Planning Admin 2019	21A		\$24,262.76
2019	10	2256	6549107	Planning Admin 2019	21A		\$28,918.62
2019	10	2256	6559108	Planning Admin 2019	21A		\$30,955.71
2019	10	2256	6571526	Planning Admin 2019	21A		\$30,502.73
2019	10	2256	6584705	Planning Admin 2019	21A		\$29,891.82
2019	10	2256	6601195	Planning Admin 2019	21A		\$55,990.50
2019	10	2256	6614860	Planning Admin 2019	21A		\$35,605.12
2019	10	2256	6626663	Planning Admin 2019	21A		\$54,516.44
2020	12	2306	6513204	2020 General Admin	21A		\$38,802.33
2020	12	2306	6532537	2020 General Admin	21A		\$45,779.60
2020	12	2306	6549107	2020 General Admin	21A		\$74,274.41
2020	12	2306	6601195	2020 General Admin	21A		\$2,358.00
2020	12	2306	6614860	2020 General Admin	21A		\$16,443.00
2020	12	2306	6626663	2020 General Admin	21A		\$4,450.00
2020	12	2367	6513204	2020-21 Fair Housing Implementation	21A	Matrix Code	\$1,407,181.89
					21D		\$5,000.00
					21D	Matrix Code	\$5,000.00
<b>Total</b>							<b>\$1,441,904.18</b>



PART I: SUMMARY OF CDBG-CV RESOURCES	
01 CDBG-CV GRANT	6,061,828.00
02 FUNDS RETURNED TO THE LINE-OF-CREDIT	0.00
03 FUNDS RETURNED TO THE LOCAL CDBG ACCOUNT	0.00
04 TOTAL AVAILABLE (SUM, LINES 01-03)	6,061,828.00
PART II: SUMMARY OF CDBG-CV EXPENDITURES	
05 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION	1,820,502.22
06 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	235,324.83
07 DISBURSED IN IDIS FOR SECTION 108 REPAYMENTS	0.00
08 TOTAL EXPENDITURES (SUM, LINES 05 - 07)	2,055,827.05
09 UNEXPENDED BALANCE (LINE 04 - LINE8 )	4,006,000.95
PART III: LOW/MOD BENEFIT FOR THE CDBG-CV GRANT	
10 EXPENDED FOR LOW/MOD HOUSING IN SPECIAL AREAS	0.00
11 EXPENDED FOR LOW/MOD MULTI-UNIT HOUSING	0.00
12 DISBURSED FOR OTHER LOW/MOD ACTIVITIES	1,185,450.01
13 TOTAL LOW/MOD CREDIT (SUM, LINES 10 - 12)	1,185,450.01
14 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 05)	1,820,502.22
15 PERCENT LOW/MOD CREDIT (LINE 13/LINE 14)	65.12%
PART IV: PUBLIC SERVICE (PS) CALCULATIONS	
16 DISBURSED IN IDIS FOR PUBLIC SERVICES	1,185,450.01
17 CDBG-CV GRANT	6,061,828.00
18 PERCENT OF FUNDS DISBURSED FOR PS ACTIVITIES (LINE 16/LINE 17)	19.56%
PART V: PLANNING AND ADMINISTRATION (PA) CAP	
19 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	235,324.83
20 CDBG-CV GRANT	6,061,828.00
21 PERCENT OF FUNDS DISBURSED FOR PA ACTIVITIES (LINE 19/LINE 20)	3.88%



LINE 10 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 10

Report returned no data.

LINE 11 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 11

Report returned no data.

LINE 12 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 12

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount		
2019	16	2348	6564356	Expanded Meal Access	05W	LMC	\$269,826.86		
			6597468	Expanded Meal Access	05W	LMC	\$163,789.14		
			6652005	Expanded Meal Access	05W	LMC	\$40,183.02		
		2349	6585463	Mobile Library Services	05Z	LMA	\$90,462.00		
			2350	6500682	Library Career Labs	05Z	LMA	\$52,142.39	
		2351	6524053	Library Career Labs	05Z	LMA	\$53,326.27		
			6564356	Library Career Labs	05Z	LMA	\$41,752.83		
			6597468	Library Career Labs	05Z	LMA	\$36,175.16		
			6557364	Library Materials Lockers	05Z	LMA	\$39,480.00		
			6564356	Library Materials Lockers	05Z	LMA	\$4,375.00		
			6585463	Library Materials Lockers	05Z	LMA	\$39,480.00		
			6627074	Library Materials Lockers	05Z	LMA	\$216.00		
			6638589	Library Materials Lockers	05Z	LMA	\$9,370.00		
			2352	6513216	Family Distance Learning	05D	LMC	\$1,292.50	
			6557364	Family Distance Learning	05D	LMC	\$39,206.61		
		2370	6597468	Family Distance Learning	05D	LMC	\$77,452.65		
			6652005	Family Distance Learning	05D	LMC	\$50,619.95		
			6557364	Emergency Rental Assistance - McLemore	05K	LMC	\$9,003.08		
			6576664	Emergency Rental Assistance - McLemore	05K	LMC	\$8,961.96		
			6585463	Emergency Rental Assistance - McLemore	05K	LMC	\$4,315.55		
			6597468	Emergency Rental Assistance - McLemore	05K	LMC	\$5,108.20		
			6614725	Emergency Rental Assistance - McLemore	05K	LMC	\$7,808.82		
			6638589	Emergency Rental Assistance - McLemore	05K	LMC	\$23,802.39		
			2371	6597468	Emergency Rental Assistance - Clues	05K	LMC	\$1,758.30	
			6601914	Emergency Rental Assistance - Clues	05K	LMC	\$3,664.52		
		2372	6652005	Emergency Rental Assistance - Clues	05K	LMC	\$9,662.37		
			6557364	Emergency Rental Assistance - LEDC	05K	LMC	\$6,307.61		
			6564356	Emergency Rental Assistance - LEDC	05K	LMC	\$9,819.31		
			6576664	Emergency Rental Assistance - LEDC	05K	LMC	\$15,723.61		
			6597468	Emergency Rental Assistance - LEDC	05K	LMC	\$10,315.04		
		2373	6614725	Emergency Rental Assistance - LEDC	05K	LMC	\$11,198.85		
			6627074	Emergency Rental Assistance - LEDC	05K	LMC	\$22,376.13		
			6576664	Emergency Rental Assistance - HAP	05K	LMC	\$7,300.97		
			6585463	Emergency Rental Assistance - HAP	05K	LMC	\$8,661.91		
			6597468	Emergency Rental Assistance - HAP	05K	LMC	\$1,490.74		
			6614725	Emergency Rental Assistance - HAP	05K	LMC	\$3,965.47		
			6638589	Emergency Rental Assistance - HAP	05K	LMC	\$5,054.80		
		Total							\$1,185,450.01

LINE 16 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 16

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2019	16	2348	6564356	Expanded Meal Access	05W	LMC	\$269,826.86
			6597468	Expanded Meal Access	05W	LMC	\$163,789.14
			6652005	Expanded Meal Access	05W	LMC	\$40,183.02
		2349	6585463	Mobile Library Services	05Z	LMA	\$90,462.00
		2350	6500682	Library Career Labs	05Z	LMA	\$52,142.39
			6524053	Library Career Labs	05Z	LMA	\$53,326.27
		6564356	Library Career Labs	05Z	LMA	\$41,752.83	





Office of Community Planning and Development  
 U.S. Department of Housing and Urban Development  
 Integrated Disbursement and Information System  
 PR26 - CDBG-CV Financial Summary Report  
 ST. PAUL, MN

DATE: 07-27-22  
 TIME: 14:43  
 PAGE: 3

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2019	16	2350	6597468	Library Career Labs	052	LMA	\$36,175.16
		2351	6557364	Library Materials Lockers	052	LMA	\$39,480.00
			6564356	Library Materials Lockers	052	LMA	\$4,375.00
			6585463	Library Materials Lockers	052	LMA	\$39,480.00
			6627074	Library Materials Lockers	052	LMA	\$216.00
			6638589	Library Materials Lockers	052	LMA	\$9,370.00
		2352	6513216	Family Distance Learning	05D	LMC	\$1,292.50
			6557364	Family Distance Learning	05D	LMC	\$39,206.61
			6597468	Family Distance Learning	05D	LMC	\$77,452.65
			6652005	Family Distance Learning	05D	LMC	\$50,619.95
		2370	6557364	Emergency Rental Assistance - McLemore	05K	LMC	\$9,003.08
			6576664	Emergency Rental Assistance - McLemore	05K	LMC	\$8,961.96
			6585463	Emergency Rental Assistance - McLemore	05K	LMC	\$4,315.55
			6597468	Emergency Rental Assistance - McLemore	05K	LMC	\$5,108.20
			6614725	Emergency Rental Assistance - McLemore	05K	LMC	\$7,808.82
			6638589	Emergency Rental Assistance - McLemore	05K	LMC	\$23,602.39
		2371	6597468	Emergency Rental Assistance - Clues	05K	LMC	\$1,758.30
			6601914	Emergency Rental Assistance - Clues	05K	LMC	\$3,664.52
			6652005	Emergency Rental Assistance - Clues	05K	LMC	\$9,662.37
		2372	6557364	Emergency Rental Assistance - LEDC	05K	LMC	\$6,307.61
			6564356	Emergency Rental Assistance - LEDC	05K	LMC	\$9,819.31
			6576664	Emergency Rental Assistance - LEDC	05K	LMC	\$15,723.61
			6597468	Emergency Rental Assistance - LEDC	05K	LMC	\$10,315.04
			6614725	Emergency Rental Assistance - LEDC	05K	LMC	\$11,198.85
			6627074	Emergency Rental Assistance - LEDC	05K	LMC	\$22,376.13
		2373	6576664	Emergency Rental Assistance - HAP	05K	LMC	\$7,300.97
			6585463	Emergency Rental Assistance - HAP	05K	LMC	\$8,661.91
			6597468	Emergency Rental Assistance - HAP	05K	LMC	\$1,490.74
			6614725	Emergency Rental Assistance - HAP	05K	LMC	\$3,965.47
			6638589	Emergency Rental Assistance - HAP	05K	LMC	\$5,054.80
Total							\$1,185,450.01

LINE 19 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 19

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2019	19	2357	6471980	CDBG-CV Program Admin	21A		\$58,670.13
			6490355	CDBG-CV Program Admin	21A		\$19,834.83
			6500682	CDBG-CV Program Admin	21A		\$12,870.51
			6513216	CDBG-CV Program Admin	21A		\$7,774.79
			6557364	CDBG-CV Program Admin	21A		\$24,840.09
			6564356	CDBG-CV Program Admin	21A		\$9,966.93
			6585463	CDBG-CV Program Admin	21A		\$24,712.38
			6597468	CDBG-CV Program Admin	21A		\$22,444.81
			6601175	CDBG-CV Program Admin	21A		\$510.00
			6614725	CDBG-CV Program Admin	21A		\$11,865.74
			6617213	CDBG-CV Program Admin	21A		\$2,105.11
			6627074	CDBG-CV Program Admin	21A		\$21,054.88
			6638589	CDBG-CV Program Admin	21A		\$12,722.89
			6652005	CDBG-CV Program Admin	21A		\$8,851.74
Total							\$235,324.83

## GLOSSARY OF TERMS, ACRONYMS, AND ABBREVIATIONS

**4(d) Affordable Housing Incentive Program** – a program that preserves affordable housing by helping rental building owners obtain property tax reductions if they agree to keep a minimum percentage of their rental units affordable over a specified period of time. The program may also help owners make existing buildings greener through cost sharing for energy efficiency improvements and solar installations.

**ADA – Americans With Disabilities Act** - a civil rights law that prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the general public.

**ADU – Accessory Dwelling Unit** – a secondary dwelling unit, subordinate to a principal one-family dwelling, within or attached to a one-family dwelling or in a detached accessory building on the same zoning lot, with the property owner of record occupying either the principal dwelling unit or the accessory dwelling unit as their permanent and principal residence.

**Affordable Housing** – defined as housing where the occupant(s) is/are paying no more than 30% of his/her income for gross housing costs, including utilities.

**Annual Action Plan (AAP)** - annual plans for the period of time covered by the Consolidated Plan (typically three to five years) which provide a concise summary of the actions, activities, and specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified in the Consolidated Plan.

**Assisted Housing** – housing which is subject to restrictions on tenant income and rents because of one or more governmental subsidies.

**AFFH – Affirmatively Furthering Fair Housing** - a legal requirement that federal agencies and federal grantees further the purposes of the Fair Housing Act.

**AI – Analysis of Impediments to Fair Housing** - is a comprehensive review of an Entitlement jurisdiction's laws, regulations, and administrative policies, procedures, and practices how those laws, etc. affect the location, availability, and accessibility of housing, both public and private, and the affect on housing choice for all protected classes.

**ALP – Wilder Assisted Living Program** - brings supportive services to residents who live in two STPHA hi-rises.

**AMI – Area Median Income** - the midpoint of a specific region's income distribution – half of families earn more than the median and half earn less than the median. For housing policy, income thresholds set relative to the area median income — such as 80% of the area median income — identify households eligible to live in income-restricted housing units and the affordability of housing units to low-income households.

**CARES Act – Coronavirus Aid, Relief and Economic Security Act** - provided fast and direct economic assistance for American workers, families, small businesses, and industries.

**CDBG - Community Development Block Grant** - an annual entitlement grant of federal dollars, from HUD to the City of Saint Paul, used to fund activities that primarily benefit low/moderate-income citizens.

**CDBG-CV** - Community Development Block Grant funding received through the CARES Act to prevent, prepare for, or respond to the coronavirus.

**CDC – Community Development Corporation** - a nonprofit, community-based organizations focused on revitalizing the areas in which they are located, typically low-income, underserved neighborhoods that have experienced significant disinvestment.

**CEYS** – Coordinated Entry for Youth and Singles – a standardized assessments for homeless individuals and youth to determine the most appropriate housing referral/housing alternatives.

**CFR – Code of Federal Regulations** – Federal regulations; HUD regulations are at 24 CFR.

**CHSP - Congregate Housing Services Program** - develops individualized services for elderly or disabled STPHA residents to maintain his/her independence.

**Conduit Revenue Bonds** – are tax-exempt revenue bonds issued by the HRA and are used for not-for-profit organization capital improvement projects.

**Consolidated Plan (Con Plan)** – a required strategic plan for any local unit of government receiving HUD funds which requires the jurisdiction to assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions.

**CoC - Continuum of Care** - a comprehensive system designed to move individuals and families from homelessness to permanent housing by providing specialized assistance (e.g., job training, psychological counseling, budget counseling, education, etc.).

**CROP – Community Resource Outreach Project** - weekly outreach at the City's Central and Rondo Community Libraries to provide referrals to community services and resources.

**CVZ – Commercial Vitality Zone** - invests in neighborhood commercial districts to promote city-wide vitality, growth, and equity. Project areas are catalytic – projects leverage other investments and opportunity to build off existing plans; are targeted toward areas of concentrated poverty and/or where 50% or more of residents are people of color (ACP or ACP50); increase vitality, strengthen commercial areas and make them more vibrant; and funded projects will grow the tax base.

**CWRC – Citywide Resident Council** – its purpose is to advocate for residents before STPHA and other agencies; evaluate physical and social conditions at respective developments or buildings; encourage programs and activities designed to promote

leadership, self-sufficiency, safety, and education; and encourage good working relationships between residents and STPHA staff.

**DSI – Department of Safety and Inspections** – a City Department whose mission is to preserve and improve the quality of life in Saint Paul by protecting and promoting public health and safety for all through code compliance; building, property, and fire inspections; permits; zoning compliance; dog licensing, among other things.

**EEOC – Equal Employment Opportunity Commission** - a federal agency that administers and enforces civil rights laws against workplace discrimination. The EEOC investigates discrimination complaints based on an individual's race, children, national origin, religion, sex, age, disability, sexual orientation, gender identity, genetic information, and retaliation for reporting, participating in, and/or opposing a discriminatory practice.

**Elderly** – a person who is at least 62 years of age and older (applies to housing activities). A person who is at least 60 years of age and older (applies to non-housing Community Development Block Grant activities).

**Emergency Shelter** – any facility with overnight sleeping accommodations, the primary purpose of which is to provide temporary shelter for the homeless in general or specific segments of the homeless population.

**Entitlement Community** – a community that receives funding directly from HUD and develops its own programs and funding priorities, for example, the City of Saint Paul.

**ESG – Emergency Solutions Grant** - provides funding to assist homeless individuals/families or prevent individual/families from becoming homeless.

**ESG-CV** – Emergency Solutions Grant funding received through the CARES Act to prevent, prepare for, or respond to the coronavirus.

**Extremely Low-Income** – persons/households whose income falls below 30% of the area median income.

**FHPAP – Family Homeless Prevention and Assistance** – a program which provides grants to encourage and support innovation at the county or regional level by establishing a comprehensive service system, including prevention services, for families, single adults, and youth who are homeless or at risk of becoming homeless.

**FHEO – Fair Housing and Equal Opportunity** - an agency within the U.S. Department of Housing and Urban Development. FHEO is responsible for administering and enforcing federal fair housing laws and establishing policies that make sure all Americans have equal access to the housing of their choice.

**FHIC – Fair Housing Implementation Council** - a collaboration of local and county governments that recognize a regional approach is necessary to effectively eliminate impediments to fair housing and promote fair housing opportunities. The collaboration consists of: Saint Paul, the counties of Anoka, Dakota, Hennepin, and Washington; the

Metro HRA (Metropolitan Council); the Community Development Agencies of Scott and Carver Counties; and the cities of Bloomington, Eden Prairie, Minneapolis, Minnetonka, Plymouth, Coon Rapids, and Woodbury.

**FSS – Family Self-Sufficiency Program** – designed to enable families to improve their education and employment status and thereby achieve a great measure of economic independence self-sufficiency.

**HAP – Housing Assistance Program** – provides housing assistance for households under the Section 8 voucher program.

**HCV - Housing Choice Voucher** – the federal government's largest program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. The eligible renter pays no more than 30% of adjusted income toward rent and utilities, and the balance of the rent is paid by the public housing agency. Housing assistance is provided on behalf of the participant who are then able to find their own housing, including single-family homes, townhouses, and apartments. The participant is free to choose any housing that meets the requirements of the program and is not limited to units located in subsidized housing projects. The program is administered locally by public housing agencies.

**HMIS – Homeless Management Information System** - a database to combine data on homeless populations served within a specific geographic area (e.g., St. Paul, Ramsey County).

**HOA – Home Ownership Alliance** - a statewide collaboration to eliminate Minnesota's homeownership gap.

**HOME Program – The HOME Investment Partnerships Program** - provides formula funding, from HUD to the City of Saint Paul, for a wide range of affordable housing activities for low-income people which can include rental, homeownership, and rehabilitation of existing housing.

**Household** – one or more persons occupying a given housing unit (Census Bureau). Occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

**Household Income** – the total income for all persons who occupy a housing unit.

**HRA – Housing and Redevelopment Authority** - a City of Saint Paul public entity which undertakes housing, commercial and business development activities. The HRA authorizes the acquisition of real estate, housing and commercial loans and grants, and the issuance of bonds.

**HTF – Housing Trust Fund** - an affordable housing production program that complements existing Federal, state and local efforts to increase and preserve the supply of decent, safe, and sanitary affordable housing for extremely low- and very low- income households and

may include homeless families. HTF funds are typically used for the production or preservation of affordable housing through the acquisition, new construction, reconstruction, and/or rehabilitation of non-luxury housing with suitable amenities.

**HREEO - Human Rights and Equal Employment Opportunity** - a department at the City of Saint Paul serves to improve the inclusive contracting practices and workforce development strategies of the City.

**HUD - United States Department of Housing and Urban Development** - the federal agency from which the City receives its CDBG, HOME program, and ESG funding.

**IDIS - Integrated Disbursement and Information System** - a nationwide database that provides HUD with current information on the status of HUD-funded activities.

**Inclusionary Zoning** - an affordable housing tool that links the production of affordable housing to the production of market-rate housing. It either requires or encourages new residential developments to make a certain percentage of the housing units affordable to low- or moderate- income residents.

**Inspiring Communities** - a City of Saint Paul housing redevelopment strategy providing focused investment in neighborhoods most impacted by foreclosure and vacancy. The program funds assist developers with development gap financing for construction of new housing on vacant lots or rehabilitation of vacant structures.

**JPA - Joint Powers Agreement** - a formal, legal agreement between the City of Saint Paul and Ramsey County for the administration of the City's annual formula allocation of Emergency Solutions Grant funding from the U.S. Department of Housing and Urban Development.

**LIHTC - Low-Income Housing Tax Credits** - a program provides tax incentives, written into the Internal Revenue Code, to encourage developers to create affordable housing. These tax credits are provided to each State based on population and are distributed to the State's designated tax credit allocating agency. In turn, these agencies distribute the tax credits based on the State's affordable housing needs with broad outlines of program requirements from the federal government. Tax credit subsidies provide a moderate level of affordability through rent restrictions. Tax credits may be combined with additional sources of federal or state funding

**LBP** - Lead-Based Paint.

**LEP - Limited English Proficiency** - individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.

**LMI (or low/mod)** - Low- and/or Moderate-Income - generally refers to individuals and/or households with incomes at or below 80% of area median income.

**LOTH** - Length of Time Homeless.

**Low-Income** – households/persons whose income is at or below 50% of the area median income.

**Mainstream Program – Mainstream Housing Opportunities for Persons with Disabilities** - provides vouchers to through Public Housing Agencies that enable persons with disabilities (elderly or non-elderly) to access affordable private housing of their choice. Also assists PHAs and nonprofit disability organizations in providing housing choice vouchers (HCVs) for any group identified in a community as having the worst housing need, i.e., very low-income persons with a disability.

**MBE – Minority-owned Business Enterprise** - business owned by at least 51% minority individuals.

**MHFA – Minnesota Housing Finance Agency** (a.k.a. Minnesota Housing or MN Housing) - the state's housing finance agency that provides access to safe, decent and affordable housing and to build stronger communities across the state by providing funding for homebuyers.

**MHU – Mental Health Unit** - Specialized SPPD officers who conduct proactive and reactive services citywide in an effort to connect citizens in need of mental health services with available community resources.

**MNHOC – Minnesota Homeownership Center** - provides homebuyer services through classes and one-on-one counseling, and helps homeowners facing foreclosure stay in their homes.

**Moderate-Income** – households/persons whose income is from 51% and 80% of the area median income.

**Multifamily Housing** – A building with 4 or more residential units, including apartments, condominiums. Multifamily units are generally attached and share a common lot. Housing type should not be confused with ownership; multi-family units may be owner-occupied or renter-occupied.

**NOAH – Naturally Occurring Affordable Housing** - refers to residential rental properties that maintain low rents without federal subsidy. It is the most common affordable housing in the U.S.

**OFE – Office of Financial Empowerment** - seeks to directly address the root causes of poverty and inequity in Saint Paul. Creation of the OFE will connect low-income residents to financial education and counseling, help them establish savings and build credit, and provide them with tools to achieve financial stability.

**OZ – Opportunity Zones** - a new community development program established by Congress in the Tax Cut and Jobs Act of 2017 to encourage long-term investments in low-income and urban communities nationwide.

**PBV – Project Based Voucher** - helps pay for rent in privately owned rental housing, but only in specific privately-owned buildings or units (see PBRA). The voucher holder does not get to choose the unit as is done with an HCV.

**PHA** – Saint Paul Public Housing Agency.

**PI – Program Income** - income directly generated from a CDBG or HOME program funded activity (e.g., loan repayments).

**PIT – Point-In-Time Count** – a count of all sheltered and unsheltered people in a specific community. Outreach workers and volunteers canvas a community to count the people who appear to be living in places not meant for human habitation. During a PIT count, communities identify whether a person is an individual, a member of a family unit, or an unaccompanied youth. In addition, communities also identify if a person is chronically homeless, indicating long-time or repeated homelessness, and if a person has a disability.

**PJ – Participating Jurisdiction** - a state or local government, for example, the City of Saint Paul, designated by HUD to receive funding through the HOME Program.

**POHP – Publicly Owned Housing Program** – Through Minnesota Housing Finance Agency, assistance is provided to PHAs that provide public housing to individuals and families (households with children) to rehabilitate and preserve public housing units.

**PSH - Permanent Supportive Housing** – Housing with supportive services; an intervention that combines affordable housing assistance with voluntary support services to address the needs of chronically homeless people.

**RAB – Resident Advisory Board** - provides the PHA and the residents with a forum for sharing information about the Agency's Annual Plan, developing and/or making any significant modifications or amendment to the plan. PHAs are required to establish one or more RABs as part of the PHA Plan process and is comprised of individuals who reflect and represent the residents assisted by the PHA.

**RAD – Rental Assistance Demonstration Program** - allows public housing agencies (PHAs) and owners of other HUD-assisted properties to convert units from HUD rental assistance to project-based Section 8 contracts. The primary benefit is that properties are able to private sources of capital financing for owners to address deferred maintenance issues.

**RRH – Rapid Re-Housing** - an intervention designed to help individuals and families that do not need intensive and ongoing supports to quickly exit homelessness and return to permanent housing.

**RUSH - Re-directing Users of Shelter to Housing** - a group of Ramsey County community partners that aims to move all frequent users of emergency shelters into stable housing.

**S.A.F.E. – Stable, Accessible, Fair and Equitable** – a set of five (5) tenants protections for rental housing, implemented in March 2021, in the City of Saint Paul.



**SBE - Small Business Enterprise** - a business that meets specific economic criteria and is owned, operated, and controlled by one or more persons.

**Section 3 Program** - requires that recipients of certain HUD financial assistance, to the greatest extent possible, provide training, employment, contracting, and other economic opportunities to low- and very low-income persons, especially recipients of government assistance for housing, and to businesses that provide economic opportunities to low- and very low-income persons.

**Single-family Housing** - A residence which includes conventional stand-alone housing units as well as patio homes, townhomes, duplexes, or structures with up to four units, one of which is occupied by the owner.

**SPPD** - Saint Paul Police Department.

**SPPS** - Saint Paul Public Schools, Independent District #625.

**SRO - Single Room Occupancy** - a residential property that includes multiple single room dwelling units. Each unit is for occupancy by a single eligible individual. The unit need not, but may, contain food preparation or sanitary facilities, or both.

**STAR Funds - Sales Tax Revitalization** - funds are derived from a City of Saint Paul half-cent sales tax levy for capital improvements to further residential, economic, and commercial development.

**Supportive Housing** - Housing that includes planned supportive services.

**TBRA - Tenant-Based Rental Assistance** - a rental subsidy that helps make up the difference between what a renter can afford to pay and the actual rent for a home or apartment.

**TIF - Tax Increment Financing** - a public financing method that is used as a subsidy for redevelopment, infrastructure, and other community-improvement projects.

**TPV - Tenant Protection Vouchers** (also referred to as **Enhanced Vouchers**) - are meant to ensure there is no displacement of low-income residents occurs as a result of various actions resulting in a loss of subsidy assistance. In other words, tenants may be displaced when a property in which the tenant lives is no longer subject to income restrictions, but the tenant does not have a voucher to ensure continued affordability. These tenants would receive a voucher to ensure affordability and protection from potential rent increases.

**Transitional Housing** - a project that is designed to provide housing and appropriate supportive services to homeless persons to facilitate movement to independent living within 24 months.

**VASH - Veterans Affairs Supportive Housing** - combines HUD HCV rental assistance for homeless veterans and their families with case management and clinical services provided by the Department of Veterans Affairs at its medical centers and in the community.

**Very Low-Income** – households/persons whose income falls below 30% of the area median income.

**VOP - Vendor Outreach Program** - a City of Saint Paul business assistance program aimed at helping WBE, MBE, and SBE have greater access to contracting opportunities with the city.

**WBE – Woman-owned Business Enterprise** – a business where at least 51% is owned and controlled by a female.