

2020-24 CONSOLIDATED PLAN ANNUAL ACTION PLAN – DRAFT

PROGRAM YEAR 2024: June 1, 2024 – May 31, 2025

CITY OF SAINT PAUL
1100 CITY HALL ANNEX
425 WEST FOURTH STREET
SAINT PAUL, MN 55102
Approved by City Council
Resolution No. XX-XXX, XX/XX/2024



**SAINT PAUL
MINNESOTA**

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

CITY OF SAINT PAUL, MINNESOTA

CONSOLIDATED PLAN 2020-2024

ANNUAL ACTION PLAN 2024-25

TABLE OF CONTENTS

AP-05	Executive Summary	
1.	Introduction	1
2.	Summary of Objectives and Outcomes Identified in Plan	1
3.	Evaluation of Past Performance	2
4.	Summary of Citizen Participation Process and Consultation Process	3
5.	Summary of Public Comments	4
6.	Summary of Comments or Views Not Accepted and Reason for Non-Acceptance	4
7.	Summary	4
	Lead and Responsible Agencies	
	PR-05 Lead and Responsible Agencies 24 CFR 91.200(b), 91.220(b)	6
	FY 2024-25 Annual Action Plan	
	AP-10 Consultation – 91.100, 91.200(b), 91.215(l) Agencies, Groups, Organizations, and Others Consulted	8
	AP-12 Participation – 91.05, 91.200(c) Citizen Participation Outreach Efforts	21
	AP-15 Expected Resources – 91.220(c)(1,2)	26
	AP-20 Annual Goals and Objectives – 91.420, 91.220(c)(3) & (e)	31
	AP-35 Projects – 91.220(d)	36
	AP-38 Project Summary	38
	AP-50 Geographic Distribution – 91.220(f)	47
	AP-55 Affordable Housing – 91.220(g)	49
	AP-60 Public Housing – 91.220(h)	50
	AP-65 Homeless and Other Special Needs Activities – 91.220(i)	54
	AP-75 Barriers to Affordable Housing – 91.220(j)	61
	AP-85 Other Actions – 91.220(k)	64
	AP-90 Program Specific Requirements	72

Attachments – Unique Appendices	
Attachment A – Capital Improvement Board (CIB) Funding Recommendations and Public Hearing Comments	77
Attachment B – Citizen Participation Plan	81
Attachment C – City and CDBG Funding and Budget Processes	88
Attachment D – Fair Housing Analysis of Impediments	90
Attachment E – City of Saint Paul New Construction and Rehabilitation Standards	100
Attachment F – City of Saint Paul Residential Anti-displacement and Relocation Assistance Plan	112
Attachment G – City of Saint Paul VAWA Emergency Transfer Plan	115
Attachment H – City of Saint Paul ESG Action Plan PY 2024-25 and Monitoring Checklists	120
Attachment I – CDBG Qualified Census Tracts and Areas of Minority Concentration Maps	175
Attachment J – SF-424s, Assurances, and Certifications	182
Attachment K - Glossary of Terms, Acronyms, and Abbreviations	183

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

This document is the one-year Annual Action Plan (AAP) for the City of Saint Paul, Minnesota, for program year (PY) 2024-25 to be submitted to the U.S. Department of Housing and Urban Development (HUD). The City's program year is June 1 through May 31. The AAP includes the City's application for 2024 Community Development Block Grant (CDBG) funding, which the City uses to invest in housing, public improvements, economic development, public services, and job creation activities. Saint Paul also receives HOME Investment Partnerships (HOME) funding to assist in the development of long-term, safe, and affordable housing. Additionally, the City receives Emergency Solutions Grant (ESG) funding, which provides programs and services to assist individuals and families to quickly regain stability in permanent housing after experiencing a housing crisis or homelessness. This document will be submitted to HUD by April 15, 2024.

Saint Paul is considered an entitlement community by HUD. Eligibility for participation as an entitlement community is based on population data provided by the U.S. Census Bureau and metropolitan area delineations published by the Office of Management and Budget. HUD determines the amount of each entitlement grantee's annual funding allocation by formula which uses several objective measures of community needs, including the level of poverty, population, housing overcrowding, age of housing, and population growth in relationship to other metropolitan areas. The City expects funding allocations of near its 2023 allocations for these programs: \$6,727,557 for CDBG, \$1,902,041 in HOME funding and \$587,737 in ESG funding from HUD in 2024. In addition, the City estimates using about \$872,443 in CDBG program income and approximately \$594,495 in HOME program income. Program income is income directly generated from a CDBG or HOME program funded activity, such as loan repayments. Because the federal budget allocations for 2024 are not yet passed upon drafting this Action Plan, the City has a contingency plan for different funding amounts. Should the City receive an amount higher or lower than the estimates from last program year, all activities will be adjusted in direct proportion to the difference in actual allocations.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Through the need's assessment and market analysis, citizen participation process, and agency consultation during the consolidated planning process, the City of Saint Paul has identified priorities to assist low- to moderate-income households/persons for Program Year 2024-25. These include:

1. Homeless prevention assisting approximately 125 households with tenant-based rental assistance (TBRA)/rapid re-housing (RRH); 3,000 persons in overnight shelters; and 400 persons with supportive services to help keep households housed.
2. Development of new affordable housing with an estimated 15 rental units and 5 homeowner units;
3. Preservation of existing affordable housing - rental housing rehabilitation an estimated 26 rental units;
4. Preservation of existing affordable housing – homeowner housing rehabilitation an estimated 51 owner units;
5. Public service needs will benefit approximately 200 persons;
6. Community engagement and outreach to underserved populations will benefit an estimated 181,300 persons;
7. Youth Employment will benefit approximately 258 persons.
8. Economic development and job growth will benefit 3 businesses with façade improvements, creation of approximately 5 jobs, and an estimated 2 businesses will be assisted.
9. Acquisition, demolition, and clearance of property an estimated 17 structures; and
10. Public facilities and infrastructure improvements benefiting approximately 23,015 persons;

The City of Saint Paul will allow, but not require, owners of HOME-funded housing developments to limit the beneficiaries or give preferences to a segment of the low-income population. This includes limiting units or giving preferences to the following low-income population segments: elderly and/or disabled, victims of domestic violence, and chronically homeless.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The City continues to seek expanded economic opportunities that benefit its low-and moderate-income citizens, preserve and create decent and affordable housing opportunities, address the needs faced by those who are homeless or are threatened with homelessness, provide accessible public services for vulnerable populations, affirmatively further fair housing, and leverage its federal HUD funding with other funds to make significant, sustainable change in the community.

During the 2022-2023 program year, the City and its partners provided housing assistance to 145 households at or below 30% of AMI, 61 households with incomes from 31% to 50% of AMI, and 39 households with income from 51% to 80% of AMI. Of these households, 38 were female-headed households.

Housing programs administered by the City were available citywide to income-eligible households. The City provided funding to sub-grantees, whose programs were available to income eligible residents residing in the sub-grantee's service areas: Districts 1 through 8, 11, and 17.

The City's ESG program funded eligible activities for homelessness prevention, emergency shelter operations, street outreach, rapid re-housing services, data collection, and ESG program administration. During the 2022-23 program year, the City's ESG program served 1,369 persons with ESG and ESG-CV funding.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The City's Citizen Participation process centers around the Capital Improvement Budget (CIB) process, a two-year cycle for which the applications occur in the odd numbered years, see Attachment C. The CIB committee is comprised of 18 Saint Paul residents representing each of the Minnesota senate districts located in Saint Paul. These residents are charged with hearing project proposal presentations, scoring projects, and providing funding allocation recommendations to the Mayor and City Council. Whereas the City budget is completed and approved on an annual basis, the CIB budget is completed for a two-year cycle based on recommendations from the CIB Committee, as shown in Attachment A.

A public hearing was held during the CIB funding cycle, a two-year cycle, in 2023 to ask for comments on funding selection and priorities prior to the Committee making its formal recommendations to the Mayor and Council. There are additional comment periods and public hearings held during the adoption of the City budget and the Consolidated Planning development process, including during the second year of the CIB cycle.

The City also sought input from public and private agencies that provide health, social, and fair housing services, including agencies focused on services to children, elderly, persons with disabilities, and the homeless. The continuous coordination and collaboration between the City, Ramsey County Continuum of Care, and other housing/health care providers allows the City to regularly assess the needs of individuals and families experiencing homelessness. State and local health and child welfare agencies were consulted for addressing lead-based paint hazards section of the Annual Action Plan.

The public comment period for this document is scheduled for March 1 through April 1, 2024. Notification of the availability of the draft document was sent out through the City's Early Notification System (ENS) and a public notice was published in the *Pioneer Press*. The notice included information for persons needing special accommodations and assistance for non-English speaking residents. The document is made available for review at the Department of Planning and Economic Development's website. The City scheduled a public hearing on March 13 2024, at the Rondo Public Library. All comments received will be considered and are included in Attachment A. Copies of the document were

also made available at PED and on the Bookmobile. A poster was displayed at all Saint Paul Public library branches with instructions to access the draft plan using a library or a home computer.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

A summary of the comments received during public hearings held during the CIB funding cycle and City budget cycle for 2024 through 2025, are included in Attachment A. Notice of the availability of this document was made through publication in a City Council designated newspaper of general circulation and sent through the City ENS. The public comment period for this document is March 1 through April 1, 2024, and a public hearing for comment is scheduled for March 13, 2024, via Microsoft Teams. Another opportunity for public comment will be at the April 2024 City Council meeting to authorize acceptance of the HUD award and submission of AAP to HUD. The date of the City Council meeting is TBD, awaiting final federal budget for 2024. Copies of the document were made available via the City's website, at PED, and on the Saint Paul Public Library Bookmobile. A poster was displayed at all Saint Paul Public library branches with instructions for how to access the draft plan using a library or a home computer. Public comments received will be summarized in final submission to HUD.

6. Summary of comments or views not accepted and the reasons for not accepting them

The public comment period for this document was March 1 through April 1, 2024, and a public hearing is scheduled to occur at Rondo Community Library on March 13, 2024. Copies of the document were made available via the City's website, at PED, and on the Bookmobile. A poster was displayed at all Saint Paul Public library branches with instructions to access the draft plan using a library or a home computer. Another opportunity for public comment will be at the forthcoming April 2024, City Council meeting to authorize acceptance of the HUD award and submission of AAP to HUD. The City will summarize those comments in the final submission.

7. Summary

The Planning and Economic Development Department (PED), Finance and Administration, Grants Compliance Division is the CDBG Administrator and lead agency responsible for the preparation of the PY 2024-25 Annual Action Plan for HUD grant funds. PED's Housing Division administers programmatic investments utilizing HOME program funding. Under a Joint Powers Agreement with the City of Saint Paul, Ramsey County administers ESG program funding allocated to Saint Paul.

The Consolidated Plan describes the City's housing market conditions, identifies the need for affordable housing and community development, and provides strategies to address these needs for a period of five years. This plan coordinates the City's housing and economic development plans with other public, private, and nonprofit community housing providers, and non-housing service agencies. The resulting

Consolidated Plan and each subsequent Annual Action Plan provides a unified vision of services, activities, and initiatives designed to improve the quality of life for Saint Paul residents by providing affordable housing, public services, revitalized neighborhoods, support for homeless and special needs populations, elimination of blight on a spot basis, and the expansion of economic development opportunities for low- and moderate-income persons.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	ST. PAUL	Planning and Economic Development
HOME Administrator	ST. PAUL	Planning and Economic Development
ESG Administrator	ST. PAUL	Planning and Economic Development

Table 1 – Responsible Agencies

Narrative (optional)

The City’s Planning and Economic Development Department (PED) is responsible for the administration of a variety of planning, housing, business, and economic development activities. These activities support neighborhood initiatives and provide direct benefits to homeowners, home buyers, renters, job seekers, and businesses. Under a Joint Powers Agreement with the City of Saint Paul, Ramsey County administers ESG program funding allocated to Saint Paul. PED also staffs the Saint Paul Housing and Redevelopment Authority (HRA), a legally distinct local entity which undertakes housing and business development activities. These activities include real estate acquisition, financing housing and commercial development, business loans, and issuing revenue bonds. PED manages all Federal funding received through HUD, approximately \$10 million annually. Additional City resources used to build community wealth through investments in affordable housing and job growth include: City Sales Tax Revitalization (STAR) programs, HRA earned income, Low-Income Housing Tax Credits, Housing Revenue Bonds, and 46 tax increment financing (TIF) districts, and local Housing Trust Fund. The amount varies annually for each funding source and for 2024 it is expected the amount available for citywide housing and development projects, inclusive of those using HUD funding, will be approximately \$98 million.

Consolidated Plan Public Contact Information

Questions and/or comments on the Annual Action Plan may be directed to the following PED staff:

Annual Action Plan
2024

6

- Jessica Deegan, Grants Compliance Manager – (651) 266-6644 or Jessica.deegan@ci.stpaul.mn.us

Written comments should be sent to the following address:

City of Saint Paul, Planning and Economic Development

Attn: Jessica Deegan, Grants Compliance Manager

1100 City Hall Annex

25 West Fourth Street

Saint Paul, MN 55102

(651) 266-6644

Jessica.deegan@ci.stpaul.mn.us

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The City of Saint Paul consulted with numerous organizations, local government agencies, and City departments throughout the Consolidated Plan process. The City held two community meetings and requested information via phone, e-mail, online survey, and face-to-face interviews with organizations.

The City's Housing staff consults with the Saint Paul Public Housing Agency (PHA), Minnesota Housing Finance Agency (MHFA), Ramsey County, community housing development corporations, for-profit and non-profit housing developers, and organizations and institutions that provide resources to finance, construct, and preserve affordable housing citywide. The City provides input in spending priorities annually through the CIB budget and overall City budget annually. A public hearing on the proposed CIB budget was held June 12, 2023, comments received are included in Attachment A.

The City's Emergency Solutions Grant (ESG) funds are administered by Ramsey County under a Joint Powers Agreement (JPA), except those funds awarded to Ramsey County as a subrecipient. Where funds have been awarded to Ramsey County as a City ESG subrecipient, City will serve as administrator of these ESG-eligible activities. Ramsey County allocates ESG funds to programs that 1) promote a comprehensive delivery of homeless services; 2) assist underserved communities; 3) provide services as needed to achieve the goals of the CoC, Ramsey County Family Homeless Prevention and Assistance Program (FHPAP), and ESG; and 4) address City concerns while meeting HUD's national housing objectives.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The City has strong relationships with numerous organizations and local government agencies that provide affordable and supportive housing and a variety of health and mental health services. The City consults with these organizations on an on-going basis. Specifically, throughout the year, the City's Housing staff consults with Ramsey County, Ramsey County Continuum of Care (CoC), Saint Paul PHA, community housing development organizations/community development corporations (CHDOs/CDCs) and housing developers to ensure residents have access to quality affordable housing citywide.

The City's ESG grant is administered through a Joint Powers Agreement (JPA) with Ramsey County Housing Stability Department except those funds awarded to Ramsey County as a subrecipient. Where funds have been awarded to Ramsey County as a City ESG subrecipient, City will serve as administrator of these ESG-eligible activities. City will assume administration of Ramsey County ESG/ESG-CV activities; Ramsey County will continue administration of other ESG/ESG-CV subrecipients. Its staff plays a pivotal role in Heading Home Ramsey (HHR) the Continuum of Care, from leadership, data and evaluation

support staff, and homeless services providers. The County leads in developing activities to enhance coordination of public/assisted housing providers, health care and social service providers from all sectors (public, private, and non-profits) by actively recruiting new HHR members, engaging providers in identifying service gaps, and developing strategic priorities to fill these gaps.

The Saint Paul Police Department supports the City's vision of a community first public safety approach through its Community Outreach and Stabilization Unit or COAST. COAST provides nontraditional law enforcement services to underserved and vulnerable populations. The COAST unit includes the Mental Health Resource Team (MHRT) and the Recovery Access Program (RAP). Both team's pair sworn Peace Officers with Clinicians to provide education, follow-up and outreach for those believed to be experiencing mental illness or a substance use disorder. The Clinicians embedded within the COAST Unit are contracted through both People Incorporated and Ramsey County Crisis. The goal of these teams is to utilize the knowledge and expertise of Clinicians and Officers to increase long-term outcomes, while also reducing interactions with the criminal justice system.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The City continues a Joint Powers Agreement with Ramsey County to allocate its ESG funds to programs that 1) promote a comprehensive delivery of homeless services; 2) assist underserved communities; 3) provide services as needed to achieve the goals of the CoC, Ramsey County FHPAP, and ESG; and 4) address City concerns while meeting HUD's national housing objectives.

To develop a plan to allocate funds to projects that could best fill gaps in communities service needs, Ramsey County relied upon the 2020 Heading Home Ramsey Needs, the CoC's current strategic priorities, quarterly ESG Provider Meetings, and CoC leadership. Due to an influx of rental assistance monies, the CoC is coordinating with the Performance and Ranking committee to re-examine the FY 2024-25 ESG priorities.

Ramsey County, with technical guidance from a U.S. Department of Housing and Urban Development (HUD) consultant, developed an ESG/ESG-CV Program Manual that outlines performance standards; eligible funding and expenditure requirements, and provided template documents to help the County and City and its funded subrecipients adhere to HUD ESG requirements. Violence Against Women Act (VAWA) language was added to the manual and providers were asked to update their written standards, too. The CoC hosted a Domestic Violence training and the VAWA ruling was reviewed as part of the training. Additionally, a quarterly meeting cadence was established to connect with ESG providers, provide updates on key policies and processes, show grant expenditure benchmarks, and facilitate best practice discussions.

Additionally, with the assistance of HUD technical assistance, Ramsey County revised the ESG monitoring process to align with HUD's requirements for monitoring. This included review of ESG funded activities; evaluation for eligible expenditures and activity funding; administration of HMIS; and tools to assess activity/subrecipient adherence to federal requirements to achieve goals as described in a subrecipient's written funding agreement.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City continues a Joint Powers Agreement with Ramsey County to allocate its ESG funds to programs that 1) promote a comprehensive delivery of homeless services; 2) assist underserved communities; 3) provide services as needed to achieve the goals of the CoC, Ramsey County FHPAP, and ESG; and 4) address City concerns while meeting HUD's national housing objectives.

Ramsey County deferred to the 2020 Heading Home Ramsey Needs, the CoC's current strategic priorities, quarterly ESG Provider Meetings, and CoC leadership to develop a plan to allocate funds to projects that could best fill gaps in communities service needs.

Ramsey County, with technical guidance from a U.S. Department of Housing and Urban Development (HUD) consultant, developed an ESG/ESG-CV Program Manual that outlines performance standards; eligible funding and expenditure requirements, and provided template documents to help the County and City and its funded subrecipients adhere to HUD ESG requirements. Additionally, a quarterly meeting cadence was established to connect with ESG providers, provide updates on key policies and processes, show grant expenditure benchmarks, and facilitate best practice discussions.

Additionally, with the assistance of HUD technical assistance, Ramsey County revised the ESG monitoring process to align with HUD's requirements for monitoring. This included review of ESG funded activities; evaluation for eligible expenditures and activity funding; administration of HMIS; and tools to assess activity/subrecipient adherence to federal requirements to achieve goals as described in a subrecipient's written funding agreement.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	RAMSEY COUNTY
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City consults with Ramsey County Community and Economic Development staff in the areas of employment and training initiatives, affordable housing development, economic development initiatives, and public service programs addressing public health services, tenant advocacy and landlord training. An anticipated outcome is that the County provides comments on the City's draft Consolidated Plan and Annual Action Plan.
2	Agency/Group/Organization	Ramsey County Continuum of Care
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Services - Victims Other government - County Continuum of Care

	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	City of Saint Pauls ESG grant is administered through a Joint Powers Agreement (JPA) with Ramsey County except where the County receives funds as a subrecipient, City serves as administrator for funding awarded to the County as a subrecipient. City ESG staff consults with Ramsey County Continuum of Care (CoC) Coordinator and other staff, attends quarterly CoC Governing Board and monthly Steering Committee meetings to implement comprehensive services to assist homeless and at-risk of being homeless residents. The outcome is that through coordination with CoC staff and the CoC Governing Board recommendations for funding for City ESG and CoC services are complementary. Other outcomes are the development of ESG and CoC program evaluations, additional service provider staff training, and increased service coordination.
3	Agency/Group/Organization	Saint Paul Public Housing Agency
	Agency/Group/Organization Type	PHA Services - Housing Services-Children Services-homeless Service-Fair Housing

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	City and PHA staff participate on an on-going basis with the CoC and Family Homelessness Prevention Assistance Program Committee and other housing initiatives. City and PHA have a working partnership which recognizes the challenges faced by the PHA administration and PHA residents. Outcomes include an understanding of the PHAs Rental Assistance Demonstration, capital improvement needs, and the high demand for subsidized rental units demonstrated by extensive waiting lists for public housing and housing vouchers; and PHAs Project-Based Section 8 Housing Choice Vouchers will assist eligible affordable housing projects financed by the City.
4	Agency/Group/Organization	DISTRICT COUNCILS
	Agency/Group/Organization Type	Planning organization Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Seventeen distinct 501(c)3 organizations make up the collective District Councils. The City contracts with these organizations to engage residents and businesses in community development planning and decision making, provide planning and advising on the physical, economic, and social development of their areas; identifying needs; and initiating community programs.

5	Agency/Group/Organization	MINNESOTA HOME OWNERSHIP CENTER
	Agency/Group/Organization Type	Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	City housing staff participates with the Minnesota Home Ownership Center (MNHOC) to implement home ownership programs such as home buyer counseling/education, mortgage foreclosure prevention counseling, and home buyer initiative for underserved communities. The anticipated outcome is the continual development of multi-lingual and multi-cultural homeownership classes and mortgage foreclosure counseling services. City staff also participates with MNHOCs Home Ownership Alliance. Anticipated outcomes are long-term homeownership strategies that may reduce the racial disparity in homeownership
6	Agency/Group/Organization	Independent School District #625
	Agency/Group/Organization Type	Services-Education Other government - Local
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	City staff and Saint Paul Public Schools (SPPS) Homeless Liaison serve as committee members of the CoC Governing Board and the Ramsey County Family Homelessness Prevention Assistance Program (FHPAP). Staff also consulted SPPS on efforts related to data collection on children experiencing homelessness. Anticipated outcomes are more shelter beds for families, particularly those with school-aged homeless children, and unaccompanied youth.

7	Agency/Group/Organization	Capital Improvement Budget Committee
	Agency/Group/Organization Type	Planning organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Capital Improvement Budget (CIB) Committee, a volunteer organization made up of citizens, reviews and ranks all proposals for CDBG funds over the course of several public meetings in the two-year cycle. After thorough review and public hearing, the CIB Committee makes recommendations to elected officials on the allocation of CDBG funds. Those recommendations are sent out to neighborhood organizations and posted on the City website for additional comment. The CIB budget is then incorporated into the City budget cycle where a second public hearing is held before adoption. Anticipated outcomes of this process include thorough review and community engagement of the applications received for CDBG funding.
8	Agency/Group/Organization	Full Stack Saint Paul Steering Committee
	Agency/Group/Organization Type	Services - Narrowing the Digital Divide Other government - Local Regional organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development Narrowing digital divide

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Full Stack and MSP Tech Hire works 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. Organizations 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. 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.
9	Agency/Group/Organization	Connectivity Blueprint
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Other government - Local
	What section of the Plan was addressed by Consultation?	Narrowing digital divide
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of St. Pauls Office of Technology & Communication (OTC) has partnered with Ramsey County and continues to participate in a workgroup called Connectivity Blueprint.

10	Agency/Group/Organization	Emergency Management Council
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Agency - Managing Flood Prone Areas Agency - Emergency Management Other government - Federal Other government - State Other government - County Other government - Local Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Emergency Management
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Emergency Management Council meets the 3rd Friday of every month. Members of the council include multiple City departments, multiple Ramsey County departments including emergency management, law enforcement and public health; State of MN Departments of Transportation, Health and Human Services, and law enforcement; Saint Paul health providers including Fairview Hospitals, HealthPartners, and Gillette Children's Hospital; Minneapolis Emergency Management; Non-Profit Emergency and Disaster Relief Service providers including the Red Cross, Salvation Army and Jewish Community Center; Saint Paul Public Schools; local utility and communication providers including Comcast and Ever-Green Energy; MN Nat'l Guard and US Coast Guard. The goal of the council is to share relevant information to reduce potential vulnerabilities, plan emergency management preparedness, and address emergency situations.
11	Agency/Group/Organization	Ramsey County Workforce Solutions
	Agency/Group/Organization Type	Services - Narrowing the Digital Divide Other government - County

	What section of the Plan was addressed by Consultation?	Narrowing digital divide
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The City of St. Paul partners with the Ramsey County Workforce Solutions and Ramsey County Libraries to work on many digital equity initiatives. As part of the initiatives, the community services department of the Saint Paul Public Libraries (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. Another initiative allowed SPPL 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. SPPL is 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.

Identify any Agency Types not consulted and provide rationale for not consulting

No specific agency types were intentionally left out of the Consolidated Plan process.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Ramsey County	City ESG funding priorities and Ramsey County CoC strategic priorities have similar goals and priorities are complementary. Starting in FY2020 ESG funding priorities Ramsey County management of Saint Paul ESG grant dollars under the terms of a Joint Powers Agreement will ensure alignment with Ramsey County CoC priorities. The partnership with Ramsey County benefits Saint Paul residents and people experiencing homelessness through coordination of funding and programming across the CoC.
Thrive MSP 2040	Metropolitan Council	The Citys strategic priorities for anti-poverty measures, fair housing, equal economic opportunity, business development, economic development and job creation are in line with the strategies identified in the Metropolitan Councils Thrive MSP 2040 plan document.
Saint Paul 2040 Comprehensive Plan	City of Saint Paul	The Citys Comprehensive Plan is in line with the Citys strategic priorities for HUD-funded activities.
Analysis of Impediments to Fair Housing Choice (AI	Fair Housing Implementation Council and Consultant	The priority need, Fair Housing and Anti-Discrimination efforts, and the Affirmative Fair Housing actions in the Citys strategic plan will be in coordination with the Analysis of Impediments to Fair Housing Choice.
Saint Paul Housing Trust Fund	City of Saint Paul	The Housing Trust Fund and resolution 18-1204 for action to create and preserve housing that is affordable at all income levels, address racial, social and economic disparities in housing, and create infrastructure needed to stabilize housing for all in Saint Paul, which is in line with the Citys strategic priorities for HUD-funded activities.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The City of Saint Paul is one of 19 municipalities located within Ramsey County, and represents approximately 40% of the county’s land area. Ramsey County is the lead human service agency in these jurisdictions. Both Saint Paul and Ramsey County participate in the Community Development Block Grant (CDBG) program, and consistently keep each other informed in all areas of the program, including non-housing community development needs. This includes ongoing communication and dialogue, and collaborations in the delivery of health care, senior

services, and employment programs. Ramsey County is required to prepare its own five-year Consolidated Plan. For consistency, Ramsey County reviews Saint Paul's Consolidated Plan Annual Action Plan and Saint Paul reviews Ramsey County's Consolidated Plan Annual Action Plan.

The Saint Paul Public Housing Agency (PHA) is the principal direct provider of housing assistance to the City's low- and moderate-income residents. In Saint Paul, the PHA is a separate legal entity, and not a part of City government. The City works closely with the PHA to develop housing goals, strategies, and program implementation. This close relationship is based on mutual goals, staff cooperation, joint planning, and program development.

The City works closely and cooperatively with the Minnesota Housing Finance Agency (Minnesota Housing) through programs that fund all types of housing needs. Both Minnesota Housing and the City offer allocations of Low-Income Housing Tax Credits through annual competitive application processes that coordinate and rank housing priorities. During this application process, City and Minnesota Housing staff have routine meetings and on-going conversations to discuss project rankings and work together to determine funding priorities in order to match limited funding resources with projects that meet the highest local affordable rental housing needs. In addition to cooperation with the tax credit program, City and Minnesota Housing staff meet monthly as part of the Intergovernmental Stabilization Group (ISG) that includes other funding partners such as HUD, Family Housing Fund and Local Initiatives Support Corporation (LISC) to collaborate on preserving existing affordable rental housing. For single-family home ownership needs, the City collaborates and receives funding from Minnesota Housing through their homeowner rehabilitation loan programs and foreclosure prevention programs. For acquisition, rehabilitation, and new construction of single-family properties, Minnesota Housing provides the City funding through their competitive application process for Community Housing Impact Funds (CHIF).

The City actively participates in the activities of the Metropolitan Council, the state authorized policy-making body, planning agency, and provider of essential services, including transportation and infrastructure, for the Twin Cities metropolitan region.

The City of Saint Paul also works closely with the City of Minneapolis. Together, the Saint Paul HRA and the Minneapolis Community Development Agency (MCDA) form the Minneapolis/Saint Paul Joint Housing Finance Board with the purpose of providing decent, safe, sanitary, and affordable housing to residents of the Twin Cities.

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The Capital Improvement Budget (CIB) process is the primary citizen participation effort for annual CDBG allocation. The Committee is comprised of 18 City residents representing Minnesota senate districts within the City. The Committee hears project proposals, scores and recommends project funding to Mayor and City Council. A public hearing was held for comments on funding selection prior to the Committee making its formal recommendations. Committee recommendation letters are included, Attachment A. The CIB process is done bi-annually and projects are approved for 2 years; Attachment C has details.

CIB recommendations were based on the City receiving the same level of funding from HUD in PY2023 as received in PY2022. The City estimates funding allocations of \$6,727,557 for CDBG, \$1,902,041 in HOME funding and \$587,737 in ESG funding from HUD in 2023. In addition, the City estimates using about \$872,443 in CDBG program income and approximately \$594,595 in HOME program income. Program income is income directly generated from a CDBG or HOME program funded activity, such as loan repayments. Should the City receive an increase or decrease in CDBG program funding from the estimated allocation, the City will increase the Multi-Unit Rehabilitation project; if there is a difference in the estimated CDBG, HOME, or ESG allocations the City will increase or decrease each grant activity in direct proportion to the difference in actual allocations.

The CIB committee budget public hearing was held on June 12, 2023 for budget years 2024 and 2025, comments are in Attachment A. The public was able to give input on the City budget, which includes the CIB budget, through 7 in-person budget roundtables and online budget survey in April and May of 2023; 21 budget input and roundtable sessions, open the public, hosted with City Boards and Commissions throughout May and June of 2023; a City Council community input public meeting September 19, 2023; the Truth in Taxation public hearing on December 5, 2023; and at the City Council meeting approving the final budget on December 6, 2023.

Public comment period for this AAP will be held March 1 – April 1, 2024. Public notice was published in the *Pioneer Press*; notice of the availability of the draft document was sent through the City's Early Notification System (ENS); the document was available for review on the City website and at the Saint Paul Public Library Bookmobile; a public hearing is scheduled March 13, 2024. Included was information for persons needing special accommodations and assistance for non-English speaking residents. Further opportunity for comment will be provided at the

April 3, 2024, City Council meeting to authorize submission of the AAP and application for funds to HUD. All comments received were considered, Attachment A.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Internet Outreach	Non-targeted/broad community	CIB recommendations were posted on the City's website as a booklet and through Open Budget for review prior to adoption.		All comments were considered	https://www.stpaul.gov/departments/mayors-office/committees-boards-and-commissions/capital-improvement-budget-cib https://www.stpaul.gov/departments
2	Public Meeting	Non-targeted/broad community	CIB Public Hearing on June 12, 2023		All comments were considered.	https://www.stpaul.gov/departments/mayors-office/committees-boards-and-commissions/capital-improvement-budget-cib

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Internet Outreach	Non-targeted/broad community	Distributed public hearing notice to all 17 District Councils, neighborhood associations and people participating in the Early Notification System (approximately 3,000 people). Citizen comments could be sent via e-mail, written submissions, voice mail or over the phone during the public comment period March 1 through April 1, 2024, and at the public hearing March 13, 2024		All comments were considered.	https://www.stpaul.gov/departments/planning-economic-development/consolidated-plan

Annual Action Plan

23

2024

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Posted Public Notice and Public Libraries, Bookmobile	Non-targeted/broad community	Posters requesting input were displayed at all Saint Paul Public Library branches, March 1-April 1, 2024, with instructions to access the draft plan on the City's website from a public library or home computer. A hardcopy of the draft document was available on the Saint Paul Public Library bookmobile		All comments were considered.	
6	Public Hearing	Non-targeted/broad community	in person Public Hearing on the draft City AAP for PY 2024-25 March 13, 2024, 3:00 p.m.		All comments were considered.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
7	Public Meeting	Non-targeted/broad community	City Council Meeting, April X, 2024, RES 24-XXX, approving submission of application for PY2024-25 application to HUD for CDBG, HOME, ESG funding and Annual Action Plan to HUD		All comments were considered.	https://stpaul.legistar.com/Calendar.aspx

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The City expects funding allocations of near its 2023 allocations for these programs: \$6,727,557 for CDBG, \$1,902,041 in HOME funding and \$587,737 in ESG funding from HUD in 2024. In addition, the City estimates using about \$872,443 in CDBG program income and approximately \$594,495 in HOME program income. Program income is income directly generated from a CDBG or HOME program funded activity, such as loan repayments. Because the federal budget allocations for 2024 are not yet passed upon drafting this Action Plan, the City has a contingency plan for different funding amounts. Should the City receive an amount higher or lower than the estimates from last program year, all activities will be adjusted in direct proportion to the difference in actual allocations.

The City has identified State, local, and private resources expected to be available to leverage and/or match HUD funding to address priority needs and the objectives put forward in the Strategic Plan. These resources may include:

- Local Housing Trust Fund
- Sales Tax Revitalization program (STAR) – ½ cent sales tax for community development investments
- Housing and Redevelopment Authority (HRA) revenues
- City Tax Increment Financing, Low-Income Housing Tax Credits Issuance of Housing Revenue and 501(c)3 Conduit Revenue Bonds
- Continuum of Care resources
- Private match for ESG investments
- Private match for HOME capital investments
- Minnesota Department of Employment and Economic Development (DEED) business loans and brownfield remediation and development grants
- Minnesota Housing Finance Agency (MHFA)
- Metropolitan Council brownfield remediation and community development grants

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	6,727,557	872,443	0	7,600,000	6,557,244	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,902,041	594,595	0	2,496,636	2,354,654	
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	587,737	0	0	587,737	614,063	

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

HUD requires that all participating jurisdictions (PJ) match, with non-federal funds, no less than 25 cents for each dollar of HOME funds spent on affordable housing. The City again received a match reduction of 50 percent due to fiscal distress and is required to match each dollar spent with

12.5 cents of non-federal match. The City will continue to leverage private and public funds for HOME-funded affordable housing and accumulate additional match.

ESG grant regulations require that grant funds be matched 100 percent or dollar for dollar. If any match is federal, the laws governing a particular source of federal funds must not prohibit these funds from being used as match to ESG. Additionally, if the ESG funds are used to satisfy match requirements of another federal program, then funding from that program may not be used as match for ESG.

Match requirements will be satisfied, as follows, when paid with non-ESG funds:

- In-kind donations
- Private donations
- Private foundation grants/funds
- Unrestricted federal, state, and local funds

The City actively pursues and/or requires developers to apply for State funding programs to include Minnesota Housing Finance Agency, Minnesota State General Obligation (GO) Bonds, the Minnesota Department of Employment and Economic Development (DEED), Metropolitan Council, and the Federal Home Loan Bank's Affordable Housing program. Private funding comes from foundations, fund raising, conventional loans, and developer cash and equity. City funding may include the local Housing Trust Fund, Housing and Redevelopment Authority (HRA) funds, LIHTC, TIF, Conduit Revenue Bonds, local sales tax dollars (STAR program), and discounted City/HRA owned land.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City owns property which may be suitable for development and offers these properties for sale for redevelopment through request for proposal process or other mechanisms to solicit competitive offers.

Discussion

Saint Paul strategically leverages financing tools including TIF, housing revenue bonds, LIHTC, Federal and State Historic Tax Credits, HRA tax levy dollars, HRA earned income, private development dollars, and State and regional funding programs to maximize investment impacts. The City's work in housing affordability and stability is specifically oriented to deepening and widening support for the lowest income residents. The City's business and job growth investments are targeted toward jobs that combine low barriers to entry with a living wage and clear career ladder opportunities.

In addition to federal, state, and local affordable housing investment vehicles noted above, Saint Paul has several programs directed toward holistic community development including job growth.

The Saint Paul Neighborhood STAR program, a ½ cent sales tax directed to community development investments, awards loans and grants for capital improvement projects in Saint Paul neighborhoods. STAR investments typically leverage four times the City investment in private funds directed to real estate and business expansion projects. These funds are estimated to have generated more than \$1.2 billion dollars in private investment throughout the city. Neighborhood STAR provides loans and grants for physical improvement projects which would generally not be completed through other City programs or private capital alone. Eligible projects are physical enhancements which strengthen and/or improve Saint Paul neighborhoods, i.e., commercial and housing rehabilitation, parks, streetscape projects, and economic development activities.

Saint Paul's growth strategy is focused on transit: 2040 Comprehensive Plan Policy LU-1 encourages transit-oriented development and most of the growth to areas with the highest existing or planned transit capacity. Transit station areas are designated as Neighborhood Nodes and are intended to be areas of higher intensity mixed-use development that support walkable access to jobs and services. There is now 1 LRT and 1 BRT line; 1 streetcar and 3 BRT lines are in the planning stage. Development, including higher density and affordable housing, is supported along these transit routes through planning, regional and state grants, and City resources.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Homeless Prevention	2020	2024	Homeless	Citywide	Homeless prevention, rapid re-housing, and support Emergency shelters and transitional housing	ESG: \$587,737	Tenant-based rental assistance / Rapid Rehousing: 125 Households Assisted Homeless Person Overnight Shelter: 3000 Persons Assisted Homelessness Prevention: 400 Persons Assisted
2	Development of New Housing	2020	2024	Affordable Housing	Citywide	Development of new affordable housing Affordable housing for special needs populations	CDBG: \$225,000 HOME: \$2,691,348	Rental units constructed: 15 Household Housing Unit Homeowner Housing Added: 6 Household Housing Unit
3	Rental Housing Rehabilitation	2020	2024	Affordable Housing	Citywide	Preservation of existing affordable housing	CDBG: \$1,968,000	Rental units rehabilitated: 62 Household Housing Unit
4	Homeowner Housing Rehabilitation	2020	2024	Affordable Housing	Citywide	Support stable, affordable, safe homeownership Lead-based paint abatement plan implementation	CDBG: \$1,945,000	Homeowner Housing Rehabilitated: 48 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Public Services	2020	2024	Non-Housing Community Development	Citywide	Fair Housing and anti-discrimination efforts Tenant and landlord education	CDBG: \$83,000	Public service activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted
6	Community Engagement	2020	2024	Non-Housing Community Development	Citywide	Community planning needs Community outreach to underserved populations	CDBG: \$345,000	Public service activities other than Low/Moderate Income Housing Benefit: 181300 Persons Assisted
7	Youth Employment	2020	2024	Non-Housing Community Development	Citywide	Public service needs	CDBG: \$371,000	Public service activities other than Low/Moderate Income Housing Benefit: 258 Persons Assisted
8	Economic Development	2020	2024	Non-Housing Community Development	Citywide	Economic development and job growth	CDBG: \$365,000	Facade treatment/business building rehabilitation: 4 Business Jobs created/retained: 5 Jobs Businesses assisted: 2 Businesses Assisted
9	Remediation of Substandard Properties	2020	2024	Non-Housing Community Development	Citywide	Acquisition, demolition, and clearance of property	CDBG: \$140,000	Buildings Demolished: 17 Buildings
10	Public Improvements	2020	2024	Non-Housing Community Development	Citywide	Public facilities and infrastructure	CDBG: \$550,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 227410 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
11	NRSA – Railroad Island/Hamms	2024	2024	Non-Housing Community Development	Citywide	Preservation of existing affordable housing, development of new affordable housing, support stable, affordable and safe homeownership, economic development and job growth	CDBG: TBD	TBD

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Homeless Prevention
	Goal Description	
2	Goal Name	Development of New Housing
	Goal Description	
3	Goal Name	Rental Housing Rehabilitation
	Goal Description	Address the need of sustaining decent housing by providing rehabilitation assistance to rental housing occupied by low/moderate-income households. Includes acquisition.
4	Goal Name	Homeowner Housing Rehabilitation
	Goal Description	Address the need of sustaining decent housing by providing rehabilitation assistance to homeowner housing occupied by low/moderate-income households.

5	Goal Name	Public Services
	Goal Description	
6	Goal Name	Community Engagement
	Goal Description	
7	Goal Name	Youth Employment
	Goal Description	
8	Goal Name	Economic Development
	Goal Description	Address the sustainability of economic opportunity by assisting businesses with technical assistance, rehabilitation or economic development activities.
9	Goal Name	Remediation of Substandard Properties
	Goal Description	Address the sustainability of a suitable living environment citywide through acquisition, clearance, relocation, historic preservation, remediation of environmentally contaminated properties, and building rehabilitation activities to the extent necessary to eliminate a specific condition(s) detrimental to public health and safety.
10	Goal Name	Public Improvements
	Goal Description	Address the sustainability of a suitable living environment by adding public improvements or renovating existing public facilities in need of improvements.
11	Goal Name	NRSA – Railroad Island/Hamms
	Goal Description	Direct targeted investments for housing and economic development to the Railroad Island/Hamms area neighborhood revitalization strategy area.

Projects

AP-35 Projects – 91.220(d)

Introduction

The project summary information provides a description and funding amount for each of the projects the City plans to undertake in program year 2023 with CDBG, HOME, and ESG program funding. The Capital Improvement Budget Committee (CIB) recommended capital projects through the two year 2024-2025 capital improvement budget process, see Attachments A and C.

Projects

#	Project Name
1	Acquisition Activities
2	Clearance Activities
3	Neighborhood Non-Profits
4	Community Engagement
5	Youth Employment
6	Housing Construction
7	Single-Unit Rehabilitation
8	Multi-Unit Rehabilitation
9	Commercial Corridor and Citywide Economic Development
10	Public Facilities Activities
11	ESG24SaintPaul
12	Planning and Administration
13	NRSA – Railroad Island/Hamms

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

HOME program funding partially finances the development of new affordable housing citywide. Through the CDBG program and local funding sources, single-family development is planned for the upcoming year to provide much needed homeownership opportunities and fill the gap in available decent, safe, affordable housing for households below 80% AMI. The primary obstacle is limited or decreasing funding and affordable land suitable for residential development.

The City has a Joint Powers Agreement with Ramsey County to allocate its ESG funds to support emergency shelters, transitional housing services, street outreach to homeless residents, homelessness

prevention, and rapid re-housing programs that support the needs of homeless or those at risk of becoming homeless. Allocation priorities were based on the CoC 2021 Needs Assessment, CoC strategic priority development process, and an evaluation of Ramsey County's homeless response to the COVID-19 pandemic. This information was shared with ESG Ranking Committee members as part of the program/activity ranking and selection process for City and CoC ESG funding. The primary barriers to addressing underserved need include continued lack of affordable housing for individuals and families at/below 15% AMI; the HUD definition of long-term homelessness status; requiring youth be diagnosed with a disability to receive help which unfavorably impacts youth access to services and housing; and lack of public will to establish long-term day and overnight shelters in the community. The CoC's ranking committee is presently being asked to examine known new funding sources in the community. The purpose is to make determinations of how much FY 2024-25 funding should focus on which components? For example, with an increase in alternative prevention and RRH funding and youth services funding, the committee will be tasked with re-examining priorities.

AP-38 Project Summary
Project Summary Information

1	Project Name	Acquisition Activities
	Target Area	Citywide
	Goals Supported	Remediation of Substandard Properties
	Needs Addressed	Acquisition, demolition, and clearance of property
	Funding	CDBG: \$220,000
	Description	Funds are requested for the HRA to acquire strategic, hazardous and/or blighted properties for reuse as determined by input and support from the applicable recognized community organizations representing the neighborhood in which the property is located.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	This project will have an indirect benefit to neighboring residents.
	Location Description	Activities are available to eligible properties citywide.
	Planned Activities	Acquisition of vacant, underutilized properties, and related demolition and/or relocation costs. This funding has historically been used for larger development sites. Substandard structures will be cleared, and the sites will be redeveloped.
2	Project Name	Clearance Activities
	Target Area	Citywide
	Goals Supported	Remediation of Substandard Properties
	Needs Addressed	Acquisition, demolition, and clearance of property
	Funding	CDBG: \$140,000
	Description	Citywide, acquisition, clearance, relocation, historic preservation, remediation of environmentally contaminated properties, and building rehabilitation activities to the extent necessary to eliminate a specific condition(s) detrimental to public health and safety.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	This project will have an indirect benefit to neighboring residents through clearance activities of 17 properties.
	Location Description	Activities will be carried out citywide on a spot-by-spot basis.

	Planned Activities	Clearance, acquisition, rehabilitation, stabilization, and remediation of properties that pose a threat to public health and/or safety.
3	Project Name	Neighborhood Non-Profits
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Public service needs
	Funding	CDBG: \$83,000
	Description	Public service activities could include: fair housing activities, community engagement, domestic violence prevention, criminal restorative justice, health care, conflict resolution, emergency shelter, employment training, and job-readiness for career pathways in the climate/green energy sector.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 200 low/moderate-income persons will be assisted through programs funded with CDBG.
	Location Description	Activities will be carried out citywide.
	Planned Activities	Assistance to public service programs administered by nonprofit organizations throughout the City. Programs include but are not limited to services for children, youth, families, senior citizens, domestic violence prevention, citizen participation, conflict resolution, emergency shelter, community restorative justice, employment training and job-readiness for career pathways in the climate/green energy sector. ,
4	Project Name	Community Engagement
	Target Area	Citywide
	Goals Supported	Community Engagement
	Needs Addressed	Community outreach to underserved populations
	Funding	CDBG: \$345,000
	Description	The program provides funding for District Councils in Planning Districts 1-8, 11, and 17 for crime prevention, community outreach and development, and policy development activities. The program also receives City General Fund local funding.
	Target Date	12/31/2025

	Estimate the number and type of families that will benefit from the proposed activities	CDBG funds will be used for activities in the CDBG eligible areas of the city. Approximately 181,300 low- to moderate-income residents will be assisted with the CDBG funds. Local funding is available for non-CDBG eligible areas.
	Location Description	CDBG-eligible districts 1-8, 11, and 17.
	Planned Activities	Crime prevention, community development, and policy development activities.
5	Project Name	Youth Employment
	Target Area	Citywide
	Goals Supported	Youth Employment
	Needs Addressed	Public service needs
	Funding	CDBG: \$371,000
	Description	This multi-year program provides economically disadvantaged City of Saint Paul youth with educational and employment opportunities. Income-eligible youth are referred to this program by the Saint Paul School District and other community organizations. Services include remedial education, classroom and occupational skills training, and part-time employment.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	Youth from approximately 258 low/moderate-income families will benefit from employment training and internships.
	Location Description	All City of Saint Paul youth from low- to moderate-income households are eligible to participate.
	Planned Activities	Services include remedial education, classroom and occupational skills training, and part-time employment.
6	Project Name	Housing Construction
	Target Area	Citywide
	Goals Supported	Development of New Housing
	Needs Addressed	Development of new affordable housing
	Funding	CDBG: \$225,000 HOME: \$2,691,348

	Description	This project will produce new units of housing either by rehabilitating vacant structures or with new construction activities, both of which may include acquisition, demolition, and relocation.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 15 low/moderate-income families will benefit from the investment in newly constructed affordable rental units and 6 homeowner units.
	Location Description	Project sites to be determined.
	Planned Activities	New units of housing either by rehabilitating vacant structures or with new construction activities, both of which may include acquisition, demolition, and relocation.
7	Project Name	Single-Unit Rehabilitation
	Target Area	Citywide
	Goals Supported	Homeowner Housing Rehabilitation
	Needs Addressed	Support stable, affordable, safe homeownership
	Funding	CDBG: \$1,945,000
	Description	The City and local CDCs administer loan programs that assist low-income households to rehabilitate their homes by addressing CDBG-eligible uses (i.e., building code enforcement, lead paint abatement, hazardous waste treatment, handicap accessibility, energy improvements, and window, roof, and siding replacement, etc.). Funds are also used for emergency repair of water/sewer lines, deficient furnaces, and water heaters.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 51 low/moderate-income households will benefit from this activity.
	Location Description	CDBG-eligible households throughout the City are eligible for this activity.
	Planned Activities	Financing to assist income-eligible owner occupants of single-family and duplex properties to rehabilitate their homes by addressing building code enforcement, lead paint abatement, hazardous waste treatment, handicap accessibility, energy improvements, and window, roof, and siding replacement, etc. Funds are also used for emergency repair of water/sewer lines, deficient furnaces, and water heaters.

8	Project Name	Multi-Unit Rehabilitation
	Target Area	Citywide
	Goals Supported	Rental Housing Rehabilitation
	Needs Addressed	Preservation of existing affordable housing
	Funding	CDBG: \$1,968,000
	Description	Assist in financing the preservation, rehabilitation, or new production of affordable housing. Implement CDBG and HOME eligible activities related to acquisition and related costs (e.g., relocation, demolition, site preparation, and adjacent public improvements), rehabilitation, new construction, and related costs that are part of the total development cost of a housing project.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 62 low/moderate-income households will benefit from this activity.
	Location Description	Projects will be selected throughout the city.
	Planned Activities	Financing to assist in the preservation, rehabilitation, or new production of affordable housing.
9	Project Name	Commercial Corridor and Citywide Economic Development
	Target Area	Citywide
	Goals Supported	Economic Development
	Needs Addressed	Economic development and job growth
	Funding	CDBG: \$365,000
	Description	Activities carried out by the City or its CDC partners to assist businesses with expansion, property acquisition, rehabilitation, energy conservation improvements, leasehold improvements, and development citywide.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	The activity will assist businesses that either serve low- to moderate-income areas or create jobs for low- to moderate-income persons. It is estimated that 3 businesses will receive facade improvements, 5 jobs will be created, and 2 businesses will be assisted.
	Location Description	This activity is available to eligible businesses citywide.

	Planned Activities	Activities to assist businesses with expansion, property acquisition, rehabilitation, energy conservation improvements, leasehold improvements, and development citywide.
10	Project Name	Public Facilities Activities
	Target Area	Citywide
	Goals Supported	Public Improvements
	Needs Addressed	Public facilities and infrastructure
	Funding	CDBG: \$550,000
	Description	Citywide facilities improvements and activities for publicly owned or non profit owned and open to the general public. Activities may include infrastructure improvements; neighborhood facilities such as libraries, parks, and playgrounds; or facilities for persons with special needs such as facilities for people experiencing homelessness.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	Number of families that will benefit from activities will depend on the specific activities and their service areas.
	Location Description	Eligible projects citywide.
	Planned Activities	Activities include facilities improvements and activities such as infrastructure improvements, neighborhood facilities, or facilities for persons with special needs.
11	Project Name	ESG24SaintPaul
	Target Area	Citywide
	Goals Supported	Homeless Prevention
	Needs Addressed	Homeless prevention, rapid re-housing, and support Emergency shelters and transitional housing
	Funding	ESG: \$585,887
	Description	Activities to include homeless prevention, shelter operations, essential services, street outreach, rapid re-housing, and ESG administration. Funding for emergency shelter operations and street outreach will not exceed 60% of ESG funding award and no more than 7.5% for administrative costs. Ramsey County will manage the Citys ESG program under the terms of a Joint Powers Agreement to coordinate resources throughout the CoC Area (Ramsey County).

	Target Date	5/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 3,525 individuals and families experiencing homelessness or at risk of homelessness will be assisted through tenant-based rental assistance/rapid re-housing services, overnight shelter, and homeless prevention activities.
	Location Description	Citywide.
	Planned Activities	Activities include homeless prevention services, emergency shelters operating costs, essential services, street outreach, rapid re-housing, and ESG administration.
12	Project Name	Planning and Administration
	Target Area	Citywide
	Goals Supported	Community Engagement
	Needs Addressed	Community planning needs
	Funding	CDBG: \$1,520,000 HOME: \$249,664
	Description	Funding for: management, coordination, oversight, and monitoring of the CDBG and HOME programs; costs included in the City's approved Indirect Cost Plan; planning activities in CDBG eligible areas of the City; environmental and historic reviews of HUD funded projects
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	This activity will indirectly benefit all low/moderate-income households citywide.
	Location Description	This activity will not benefit a physical location.
	Planned Activities	Funds are budgeted to pay salary and operating costs for overall administration and coordination of budget development, citizen participation, reporting, and compliance for Consolidated Plan grants. Staff includes Managers, Financial Analysts, Compliance Coordinators, IDIS Coordinator, and Administrative Support.
13	Project Name	NRSA – Railroad Island/Hamms
	Target Area	Citywide
	Goals Supported	

	Needs Addressed	Community planning needs
	Funding	TBD
	Description	Targeted activities related to work done within the boundaries of the Railroad Island/Hamms
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	TBD
	Location Description	NRSA boundaries
	Planned Activities	Funds for subrecipients budgeted for CDBG activities in their service areas will be moved into the project to reflect location in the NRSA when applicable.

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

None of the 2024 activities have an address-specific location. All the activities described in the AAP are programs which are available citywide or have service areas that include one or more neighborhoods (districts) in the city. A map showing the areas of the city with at least 51% low/moderate income persons is titled as CDBG-Qualified Census Tracts 2024 is in Attachment H. All activities providing an area benefit being carried out in PY 2024-25 will have a service area that is located primarily in a shaded portion of the map.

Activities carried out by the City which provide a direct benefit (primarily housing activities) are available citywide to income eligible households, while direct benefit activities carried out by sub-grantees are available to income eligible households located in the neighborhoods served by the sub-grantee. Activities carried out for the ESG program through Ramsey County are available citywide and are part of broader Continuum of Care area coordination of resources.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	100

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

By allocating investments citywide, the City is working to prevent additional concentrations of low-income and minority populations through targeted affordable housing development which will provide expanded access to economic, employment, and housing options for low- and moderate-income residents citywide.

Discussion

HUD funding will continue to be used for housing activities citywide. Public infrastructure projects in low- and moderate-income areas will utilize CDBG funds in conjunction with local (local bonds, TIF) and state funds (state municipal aid, Minnesota Department of Transportation), providing improvements citywide for the benefit of all residents.

CDBG funds will be targeted as appropriate to the Railroad Island/Hamms Neighborhood Revitalization Strategy Area.

The ESG funding activities are available citywide and benefit Saint Paul, but as part of CoC resource coordination will include some beneficiaries residing outside of the City of Saint Paul but within the broader CoC area. As the City of Saint Paul includes the majority of people experiencing homelessness in the broader CoC, the proportion of beneficiaries residing outside of the City is expected to be reasonable, documented as practicable, and will not include a specific percentage of funds that would be targeted.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	98
Special-Needs	0
Total	98

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	21
Rehab of Existing Units	77
Acquisition of Existing Units	0
Total	98

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

In 2024, the City estimates providing funding for the construction of 15 new affordable rental units through HOME and CDBG funding. It is estimated that CDBG will fund the construction and/or the acquisition/rehabilitation/resale of 6 homeownership units. The City will continue its citywide owner-occupied home rehab program as well as continuing to fund and work with its non-profit partners resulting in an estimated 51 owner-occupied homes rehabilitated – a strategic effort to preserve affordable housing. CDBG funding will also be available for the rehabilitation of existing affordable rental housing to preserve affordability and livability of these units, approximately 26 units. With this work, the City will also seek to address racial disparities in housing and affirmatively further fair housing.

AP-60 Public Housing – 91.220(h)

Introduction

The 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). The 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. The PHA also administers 5,243 Housing Choice Vouchers (HCV) as of February 2024. These include 175 Family Unification Program (FUP) vouchers, 318 Mainstream Program/Disability vouchers, 276 Veterans Affairs Supportive Housing (VASH) vouchers, and 157 Emergency Housing Vouchers (EHV). PHA has allocated 799 project-based vouchers (PBVs); and more than half of those (532) are in supportive housing developments. In total, the PHA provides nearly 9,500 affordable homes to more than 22,000 people.

The Annual Agency Plan for Federal FY 2024 (PHA's Fiscal Year 2025, beginning April 1, 2024), and the Five-Year Capital Fund Plan are available on the PHA website at: www.stpha.org.

The PHA continues to move toward green and sustainable solutions. The City Council presented the 2017 Sustainable Saint Paul Award for Green Practices to the PHA in recognition of its green initiatives. PHA retains consultants to conduct energy audits of its properties and incorporates feasible recommendations for energy improvements into its capital needs planning. Xcel Energy, a valued partner, has provided rebates to help cover the cost of energy saving retrofits. Ongoing green initiatives include installing water saving faucets, shower heads, and toilets; lighting retrofits; weather stripping, and additional attic insulation. The PHA maintains a computerized building management system (BMS) at all 16 public housing hi-rises, 4 community centers and the central administrative office building which allows staff to monitor and control HVAC systems remotely resulting in increased energy efficiency and savings. The PHA also utilizes District Energy St. Paul at 4 of its hi-rise apartment buildings, 302 townhomes and central administrative office building, utilizing an alternative energy source for its residents and community spaces. The PHA executed a community solar agreement in 2018 that provides 10 of its hi-rises 100% solar power for electricity while saving \$120,000 per year for 25 years.

The PHA has maintained its High Performer status under HUD's Public Housing Assessment System (PHAS) for 32 consecutive years. The 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 22 consecutive years. The PHA successfully implements and administers current agreements for Project-Based Vouchers (PBV); including PBV in supportive housing that supports the State of Minnesota, Ramsey County, and the City of Saint Paul with plans to end homelessness.

Actions planned during the next year to address the needs to public housing

Remaining Public Housing Program-418 scattered site single family homes and duplexes remain in the public housing program. The PHA is committed to preserving these homes as safe, affordable, quality housing for low-income families.

Rental Assistance Demonstration Conversion (RAD)-PHA continues to refine its operational model for PBRAs for the 3,836 affordable housing units that were previously funded as public housing. Capital Improvements-PHA will use HUD Capital Fund Program funds (for public housing units) and Housing Assistance Payments (HAP) for PBRA units, to renovate and modernize units, with emphasis on fire and life safety improvements and green sustainable designs to conserve energy and water. PHA will continue to seek grants and forgivable loans from Minnesota Housing, Ramsey County and the City of St. Paul, as well as the Federal Home Loan Bank's Affordable Housing Program and other sources. Project-Based Vouchers (PBV)-PBVs awarded by the PHA subsidize rental units in privately-owned mixed-income, supportive housing and other affordable housing developments, in collaboration with community partners-City, Ramsey County, St. Paul Foundation, and others. PHA Board will consider staff's recommendations for awarding more vouchers for PBV use.

In the coming year the PHA will continue administering HCVs from special HUD programs:

- VASH-Assists homeless veterans receiving services from the Veterans Administration
- Mainstream Program-Housing Opportunities for Persons with Disabilities. Assists households that include persons with disabilities, in collaboration with several community social service agencies.
- Family Unification Program Vouchers (FUP)-In collaboration with Ramsey County's Child Protection Unit, helping families secure stable housing and be unified with their children. FUP also serves 18–24-year-olds who have aged out of or left foster care at age 16 or older, who are homelessness or at risk of becoming homeless.
- Emergency Housing Vouchers (EHV)–The PHA received EHV vouchers from HUD in 2021. Working with partner agencies, the PHA issues the vouchers to individuals and families who are homeless or at risk of homelessness, fleeing domestic violence, etc., in accordance with the requirements in the “American Rescue Plan Act”.

Tenant Protection/Preservation Vouchers (TPV)-Prevents displacement of low-income residents when a previously subsidized rental property is no longer subject to income-restrictions.

PHA-Owned Waiting Lists–The Multifamily waiting list opened 3/1/2023 and remained open as of 1/1/2024. The Public Housing waiting list opened 4/21/2022 and closed 6/20/2022. As of 1/1/2024 there were 5,520 applicants on the Multifamily/PBRA waiting list for apartments in hi-rises and family townhome developments. The public housing waiting list (2,927 applicants) is for single family homes and duplexes. Even when waiting lists are closed, the PHA still accepts applications for 2 programs with special services in PHA-owned housing: Congregate Housing Services Program (CHSP) and the Wilder Assisted Living Program (ALP), both provide services to allow for independent living.

HCV waiting list–Opened for applications for 1 week in November 2022. By a random computer drawing, 2,000 applicants were placed on the waiting list from 6,500 applications received. The PHA expects the 2,000 to be served in 1 ½ years. As of 1/1/2024, about 1,600 applicants remained on the waiting list. When the regular HCV waiting list is closed, clients can still apply for vacancies at some housing projects with PBVs. Those vacancies are offered through the Ramsey County Coordinated entry. PHA describes other referral-based applications in the “How to Apply” section for HCVs on the PHA's website.

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

The PHA's Resident Services and Resident Initiatives Departments support the Resident Councils in every hi-rise and family housing development (formerly public housing, now Multifamily Housing). Each Resident Council works to increase resident involvement in its public housing communities and empower residents to take action to achieve personal goals of self-sufficiency. The leaders of the individual Resident Councils meet regularly as the Hi-Rise Presidents Council and the City Wide Residents Council (CWRC).

Two PHA Commissioners are residents of PHA-owned properties. One Commissioner represents hi-rise residents and another family residents.

The PHA actively encourages discussions about planning capital improvements and PHA policies. During the year, PHA Senior Management meets with the Hi-Rise Presidents Council and CWRC, to discuss any significant policy changes and PHA Capital Improvements. Additionally, the PHA's Resident Initiatives Department and Resident Councils work together to form new partnerships with community and supportive service agencies.

Section 3 - PHA provides economic opportunities for low-income residents, to the greatest extent feasible, by hiring qualified Section 3 PHA residents, contracting with Section 3 businesses, and including Section 3 requirements in all contracts for public housing. The PHA's Resident Initiatives Department also identifies resources and services to provide Section 3-related education and training to public housing residents.

Family Self-sufficiency Program (FSS) - enables families in the Housing Choice Voucher program to improve their educational and employment status and thereby achieve a greater measure of economic independence and self-sufficiency.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not applicable. See above

Discussion

The PHA has achieved High Performer status continuously for both its public housing and Section 8 Housing Choice Voucher Program.

The PHA has a continual need for stable federal funding to maintain its high standards. The PHA received approval from HUD to convert most of its public housing properties to Project-Based Rental Assistance (PBRA) under HUD's RAD program, effective January 1, 2020. The PHA's near-portfolio-wide RAD conversion was debt-free. After RAD, the units are funded as PBRA (a Section 8 platform in HUD's Multifamily Housing division) with a long-term contract that, by law, must be renewed. This ensures that the units remain permanently affordable to low-income households. Residents continue to pay 30 percent of their income towards the rent and retain the same basic rights as in public housing. This program simply shifted units from the Public Housing program to the PBRA program. The PHA's RAD conversion was not "privatization" of public housing, since the same public agency continues to own, manage, maintain, and improve the properties.

More information about the PHA is on their website, www.stpha.org.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

Those most at risk of homelessness are youth, older adults, and veterans. The region sees large and persistent racial disparities, with African Americans 8.7 times, Native Americans 14.5 times, and LatinX 2 times as likely to experience homelessness than white residents. The City also sees new immigrants in the unsheltered population. The primary causes of homelessness are lack of affordable housing and living wage jobs with low barriers to entry, chronic health and mental health issues, and the ripple effects caused by discrimination in housing and other systemic inequities. The City has a Joint Powers Agreement with the County to allocate its ESG funds to address the needs of those experiencing homelessness or at-risk of homelessness. In 2023, the City will partner with Ramsey County and its CoC Coordinator and service agencies to respond to needs of residents experiencing homelessness and underserved homeless populations including families with minor children, youth and those living outside in places not meant for human habitation. In the 2023 Point in Time (PIT) count, the largest population increases included homeless families and in particular, Asian families.

The City continues work with weekly with the homeless outreach teams including Breaking Free and People, Incorporated. The City and County partner with Metro Transit's Homeless Action Team which provides street outreach, support, and resources to help homeless residents access emergency shelter at Safe Space and permanent housing options.

Catholic Charities Higher Ground provides supportive housing units and an Opportunity Center with wrap around services. Weekly street outreach activities include locations such as the George Latimer and Rondo libraries, and the Opportunity Center. St. Paul Residence continues for low-income, long-term homeless adults, providing permanent supportive housing using the Housing First model. Saint Paul also has residents that are not homeless but have special needs that require supportive services to allow them to remain in their current housing situations or find supportive housing. The City will continue to provide funding supportive services that assist those with special needs. Saint Paul's CDBG funds are allocated to the Block Nurse Program which utilizes volunteer and professional staff to help the elderly remain safely in their homes with an enhanced quality of life. Additionally, the City finances multi-family affordable housing developments that must comply with ADA requirements. The City is partnering with the County, housing providers and private/non-profit developers to plan for the expansion of supportive housing supply and services.

A variety of housing options ranging from independent living and housing with supportive services are available for residents with special needs. Services for the elderly, frail elderly, and persons with disabilities include independent living programs, City's Home Rehab Programs, Minnesota Homeownership Center's (MNHOC) Mortgage Counseling, ADA-designed housing, congregate living and

assisted living facilities, nursing facilities, State of Minnesota, ARC Minnesota, HUD Section 811 Program for persons with disabilities, and the Block Nurse Program. Services for public housing residents with special needs include SPPHA's Assisted Living Programs (Wilder ALP and CHSP), PHA/Accessible Space New Beginnings - Brain Injury Program. And for residents with HIV/AIDS and their families, PHA/Accessible Space, Inc. provides housing and services. The City of Minneapolis manages HOPWA for Saint Paul, and the Minnesota AIDS Project helps families obtain/maintain housing.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The CoC and Ramsey County are actively exploring strategies to reduce the number of persons becoming homeless in the community by focusing on strategic homeless prevention efforts and the Coordinated Entry System (CES). The CES is designed to assess and connect people to available housing options.

In 2022, the CoC developed a new Prevention and Tenant Stability workgroup. The workgroup has undergone a multi-month gaps analysis process and has the following recommendations:

1. Work closely with the county's Emergency Assistance department and other prevention resources such as the Minnesota Housing Prevention and Assistance (FHPAP) programming to break down silos and make rental assistance more expeditious.
2. Bring on more landlords; and
3. Develop centralized websites and dashboards- streamlining all prevention resources

CoC's Coordinated Entry Sub-committee is implementing recommendations from the Ramsey County 2020 CES Evaluation to improve outcomes which include: 1) conduct a CES policy review to identify existing policies that people with lived experience of homelessness, providers, and CES Priority List Manager identify as creating barriers to access to CES and housing referral; 2) remove people from the priority list who have not been in contact with providers/CES priority list staff or show up in the City/Ramsey County HMIS for several years; 3) increase the number of people being assessed; 4) with post-assessment provide more connections to mainstream services (housing financial assistance, employment, landlord mediation); 5) increase new landlord engagement/collaborations with the goal to create and increase housing options and reduces the wait time for housing.

CoC and the City continue to actively engage people with lived experience of homelessness, homeless service providers, domestic violence service providers, and other community partners that serve the homeless population through regular meetings. These meetings provide a better understanding of the needs of both sheltered and unsheltered persons experiencing a housing crisis.

All ESG and HUD funded program staff are trained in conducting CES assessments and the HMIS intake process. At the program-level, for both ESG and other HUD funded programs, there is a requirement for specific documentation (per project and funding type) that must be included in a client's file: initial intake, eligibility forms, income verification, housing barriers matrix, housing stabilization plan, exit forms, etc.

It is through this process, that people experiencing homelessness and their providers can determine the best path to resources (health care, financial services, employment, support services, housing, etc.) to resolve the housing crisis and establish the necessary services to promote self-sufficiency and housing stability.

For example, a system gap identified in the 2020 and 2021 HHR Needs Assessment was the need for an outreach program specifically for families. Through City ESG funding, Ramsey County contracted with a provider to operate an outreach program specifically for this activity. The service needs for families is far different than other subpopulations of homeless and a dedicated family-specific outreach program was the best approach to meet the needs of marginalized families within the community.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City has a Joint Powers Agreement with the County to allocate its ESG funds to partially fund emergency shelters, transitional housing services, street outreach to residents experiencing homelessness, homelessness prevention, and rapid re-housing programs that support the needs of homeless or those at risk of becoming homeless.

Youth - Salvation Army Booth Brown House: ESG funding helps support the operations of a youth emergency shelter. Programs serve homeless youth aged 18-21 and permanent supportive housing is provided for youth aged 16-21. A comprehensive array of support services and case management from basic needs, life-skills classes, access to mainstream benefits, and ongoing services to support education, job training, and housing stability are provided.

Single Adults - Catholic Charities Higher Ground: ESG funding helps support the daily operations emergency shelters which target single adults. Basic needs and advocacy services are provided. The shelters are located close to Catholic Charities St. Paul Opportunity Center which provides residents with easy access to daily meals, county resources, on-sight health care, veterans services, and with access to public transportation. ESG funding also supports the low-barrier shelter for single men and women known as Model Cities' Safe Space.

Families - Catholic Charities Family Service Center and Interfaith Project Home: ESG funding supports daily shelter operations and essential services. Program services include shelter space, shower, laundry, meals, on-site medical and dental services, transportation assistance, housing navigation, transportation assistance, connections to benefits and advocacy. Children's services include mentoring, tutoring, and early childhood education. Note the Family Service Center is located in Maplewood but serves full CoC area, benefiting the population experiencing homelessness in the CoC, primarily in the City of Saint Paul

Transitional Housing: ESG funded programs such as street outreach and emergency shelter provide CES assessments to determine the best housing option to meet the needs of the client. In some cases, clients need a Housing First model with time-limited supports to move on to self-sufficiency which is met through a transitional housing program.

New in 2023, the CoC prioritized the concept of a Single Point of Entry (SPE) into emergency shelter. This is a key, trauma informed practice that eases a homeless person's experience with securing a shelter bed. In short, customer service representatives will be available day and evenings and weekends to hold shelter beds- this replaces the current fragmented practice that currently makes clients participate in a nightly lottery or wait until 10 pm to find out if they have a bed.

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

The City's ESG and County CoC programs work together to fund community services, including homelessness prevention programs. vision is to align local, state, and federal funding streams through the CoC with Ramsey County as the lead agency. Additionally, the City's CDBG funds have been allocated to the Block Nurse Program which utilizes volunteer and professional staff to help seniors remain safely in their homes with an enhanced quality of life.

Providers within the CoC, community service partners such as the Minnesota Assistance Council for Veterans, public service partners such as Ramsey County, Metro Transit Homeless Action Team, and SPPS work collaboratively to serve the needs of chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth.

Within the ESG funded street outreach, emergency shelter, and homeless prevention programs, assessors are trained to facilitate a client's transition from homelessness to permanent housing. Permanent housing options may include rapid re-housing (RRH), permanent supportive housing (PSH),

other permanent housing, and private/market rental housing. The City's St. Paul Residence provides permanent supportive housing for those with late-stage chronic alcoholism and for long term homeless residents using the Housing First Model.

As of October 2021, there were 1,879 individuals and heads of families on the CES Waitlist. These are clients that have been assessed and are waiting for a housing referral based on the needs identified during assessment. There were also 223 individuals and heads of families on the CES referral list. This reflects the clients with pending housing referrals, acknowledgement of referrals received by housing providers, and outcomes of each referral.

Considering the gap in the number of housing options available versus the need (i.e., people waiting), assessors are trained to determine the severity of the clients' level of need, which may prioritize them for housing. Additionally, during the engagement and assessment process, information is gathered to determine a client's unique immediate and ongoing service needs, identify assets and barriers to housing, and develop a plan to reduce the amount of time that a client is homeless. Ultimately, the desired outcome is to assist the client with ongoing support services to further housing stability and reduce the likelihood of returning to homelessness.

Saint Paul uses CDBG funds, HOME Funds, and Low-Income Housing Tax Credits, as appropriate, to construct or preserve affordable housing, including developing or preserving supportive housing for long-term homeless residents.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: 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); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

Ramsey County provides programs and counseling to previously institutionalized or homeless individuals through partnerships with nonprofit service providers to aid in the transition to permanent housing. This network provides emergency assistance, cash and food assistance, health insurance, security deposits, childcare, job training, transportation, medical/dental care, mental health counseling, chemical dependency treatment, life skills training, and job search assistance. City and CoC coordinate with services providers and county corrections staff to provide assessments and referrals to the CES to prioritize people for services, i.e., emergency assistance, prevention, employment services, and housing.

Minnesota Community Care (MCC) – HouseCalls Program: The goal of HouseCalls is to prevent homelessness by stabilizing housing for those at imminent risk. Over the last 29 years, HouseCalls has refined its utility, rent and sanitation assistance program into a successful, long-term homeless prevention model. This model relies on the following strategies: early intervention and referral,

coordination and advocacy, prevention, and stability. A collaboration of the St. Paul Ramsey County Public Health Department and MCC, HouseCalls combines the breadth of a public agency with the flexibility of a nonprofit to meet the needs of people at-risk of homelessness. Ramsey County Family Homeless Prevention and Assistance (FHPAP) program also funds 12 other eviction prevention program throughout the city and metro; the largest program includes eviction prevention within Housing Court that is a partnership between Ramsey County, Neighborhood House and Legal Aid.

Face to Face – Homeless Prevention: The target population is unaccompanied youth aged 18-24 at-risk of homelessness. Overall program demographics are youth of color, 15% have a long-term disability, nearly a third have children, and many have been in foster care or have experienced domestic violence. The program provides both short-term and medium-term rental assistance based on individual need. On-going case management is provided to support employment, navigate insurance, WIC, achieve personal goals, and help youth find and retain permanent housing. Prevention assistance advances outcomes - reducing both the number of homeless youth and the number who become homeless for the first time.

Individuals and families at risk-of homelessness due to extremely low-income, discharged from institutions or age out of foster care, and/or currently receiving other public, non-profit or private sector services may be directed to prevention services by contacting United Way 211, calling providers directly or accessing HHR's website for resource and intake information.

New in 2023, the Single Point of Entry (SPE) project also includes the development of two diversion case managers. So any individual new to shelter access will be engaged with diversion tactics designed to prevent or mitigate entry into shelter or long-term shelter stays.

Discussion

The City will continue its collaboration with Ramsey County CoC and social service organizations to coordinate resources across the CoC area. This collaboration is essential to addressing the needs of homeless and those at risk of being homeless as well as providing housing and supportive services for non-homeless special needs persons. Coordinating in funding across the CoC area is beneficial to Saint Paul residents and meets the priority needs identified in this plan for homeless prevention, rapid rehousing and emergency shelters and transitional housing. The CoC completes a federally required annual Point-in-Time (PIT) Count. The PIT, done by staff and volunteers, is a count of sheltered and unsheltered people experiencing homelessness on a single night in January. The purpose is to get a snapshot of the state of homelessness by counting every person experiencing homelessness. The most recent PIT count was in January 2023. Other means used to determine the number of homeless and identify the areas of greatest need are using Wilder Research, HHR 7 Community Measures, and CES dashboards.

Every 3 years, Wilder Research, part of the Amherst H. Wilder Foundation, conducts a one-night statewide survey of homeless persons in Minnesota to better understand the extent, causes, circumstances, and effects of homelessness. The data are very helpful due to the comprehensive survey data gathered from people experiencing homelessness to further help inform planning to identify client-level needs, system strategies that are working, and service gaps.

The CoC dashboards further enhance planning and prioritization by using HMIS data. HMIS data gives a more complete picture of the homeless population and is updated quarterly.

These data sources provide Ramsey County, CoC and the City with the most comprehensive data and analysis on the reasons City and County residents are homeless and help identify barriers to finding and maintaining safe and stable housing. The data, analysis, and reporting help improve understanding about the extent, causes, circumstances and effects of homelessness in Ramsey County and Saint Paul, which then guides actions (i.e., funding priorities) to eliminate homelessness through CoC and City ESG resources.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Housing policy must be thought of in the context of economic development (building household income/net worth), transportation (connecting people to jobs) and land use (locating parks, jobs, education and essential services near housing). City Council passed resolution 18-1204 to create and preserve housing 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 (HTF); and continue to fund down payment assistance for first-time homebuyers. The resolution is a public acknowledgement that housing, especially affordable housing, is a City priority.

The most significant barriers to affordable housing are insufficient income and lack of affordable housing units. The greatest gap in affordable housing units is for households with income below 30% of AMI, followed by units available to households at or below 50% of AMI. Not only are the number of units few, but many of the units are occupied by households that could afford a unit at a higher rent. Because there are not enough available rental units, the City has set aside CDBG funding for the program year specifically to partially finance the production and preservation of multifamily housing affordable to households at/below 30% AMI.

Housing data for the City shows that the greatest needs and highest housing priorities are affordability, choice and supply. Consistent with the City's 2040 Comprehensive Plan – Housing Chapter, affordable housing policy priorities are: the preservation and production of rental housing affordable for those at/below 30% of AMI; homeownership opportunities for households with low- and moderate incomes; affordable housing preservation for low-income elderly homeowners at 0-50% AMI; and housing for special needs populations.

Policy H-32 of the 2040 Comprehensive Plan supports affordable housing development, "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."

The City's Locational Choice Policy and Low-Income Housing Tax Credit (LIHTC) selection process also encourage a more equitable distribution of affordable housing citywide with priority given to proposals with deeply affordable units.

Affordable housing development needs and often draws upon multiple funding sources including City local funds, Bonds, TIF, LIHTC, state funds (the Minnesota Housing Finance Agency, the Metropolitan Council, the Department of Employment and Economic Development), federal HUD funding (CDBG, HOME), ARPA, and redevelopment property acquired and assembled by City and County. In addition to the funding sources above, the City is using its allocation of American Rescue Plan Act (ARPA) funds to

encourage the creation and preservation of deeply affordable units for households with income at 30% AMI or less.

Actions it planned 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

There are about 18,000 publicly assisted affordable housing units within Saint Paul; roughly 9,400 are subsidized through the PHA. Other units have resulted from citywide policies and efforts. Barriers to affordable housing include a lack of funding, land, and zoning regulations that restrict housing production at greater densities. The City finances preservation, rehabilitation and construction of affordable housing citywide using city-owned and discounted County-owned land and local, state, and federal funds and financing tools - LIHTCs, Federal and State Historic Preservation Tax Credits and issuing Housing Revenue bonds.

City Council Resolution 18-1204 outlines a broad range of actions to support greater housing supply and stability, including efforts to create and preserve housing affordable at all income levels; address racial, social and economic inequalities in housing; create infrastructure to stabilize housing; fund an Affordable Housing Trust Fund; and continue to fund down payment assistance for first-time homebuyers. The Resolution also called for housing funded through the HRA to accept Section 8 vouchers; added points to the LIHTC scorecard for senior housing; and increased use of Tenant Remedies Actions. It also mandated housing production goals for the next 10 years with at least one-third affordable to households at 30-50% AMI.

The City has established sustainable building regulations to increase the environmental and financial sustainability of development. Upfront investments in energy efficiency increases costs of new construction/major renovation but results in structures that are more sustainable and energy efficient which cost less to operate and maintain over time, which directly benefits LMI tenants.

In 2021, the City eliminated minimum requirements for off-street parking in the zoning code; the goal is to reduce development costs for housing, and spur development of new housing and businesses while reducing vehicle miles traveled through alternatives such as the use of transit and bikeways. The City completed and adopted Phase 1 of a 1-4-unit housing study including zoning code amendments to reduce barriers to allow increased density in neighborhood-scale residential development and diversify housing options in March 2022.

In addition, in the past two years, CDBG funding was provided for community land trust housing to extend homeownership opportunities to lower income residents, and City and State allocated funds for deferred down-payment assistance loans designed to make homeownership possible for lower income residents by reducing private mortgage requirements. City continues to preserve Naturally Occurring

Affordable Housing through the 4(d) program which gives rental property owners an approximate annual property tax rate reduction of 80% and grant assistance for rehabilitation for units that remain affordable at 50% or 60% AMI for the next 10 years. The City is also supports Naturally Occurring Affordable Housing through a Rental Rehab program, and in 2024 will be implementing a new Naturally Occurring Affordable Housing acquisition fund.

Affordable housing is an important element of redevelopment with City investment in infrastructure. At the former Twin Cities Ford assembly plant site, the Highland Bridge redevelopment is required to include 760 income-restricted affordable housing units, or 20% of the proposed 3,800 total units. 380 affordable to households earning 30% AMI, 190 affordable at 50% AMI and 190 affordable at 60% AMI. The proposed redevelopment of the former Hillcrest golf course (AKA The Heights) includes the production of 91 units (or more than 10% of the total units) to be affordable to households with income at 30% AMI or below, while 93 units (10.3% of the total number of units) will be restricted to households with income at 50% AMI, and 343 units (38.2% of the total number of units) will be restricted to households with income at 60% AMI.

Limited English proficiency (LEP) is a barrier to accessing City services and programs. Through its LEP plan City services, programs and information is available to everyone, regardless of language. Written materials for City programs and services are translated into primary languages, interpreters are provided at community meetings, City offices have access to interpreters via a telephone service and the City's website is translatable.

Discussion:

The City of Saint Paul has strong working relationships with the federal, state and county governments to develop affordable housing in Saint Paul. The City has also adopted Affordable Housing Policies that support the development and preservation of affordable housing units citywide. That said, the City lacks the financial capacity alone to meet the affordable housing needs of all its residents. As a result, federal, state, county, and local budgetary restrictions are a significant barrier to developing enough affordable housing in Saint Paul.

AP-85 Other Actions – 91.220(k)

Introduction:

Actions planned to address obstacles to meeting underserved needs

In 2023, the City will address many of its underserved needs through activities of ongoing, multi-year HUD funded housing programs; primarily new construction or preservation of large family units, and units for very low- and extremely low-income households. City and its partners using CDBG and HOME program funding, LIHTCs, TIF, local funds, and the City's Housing Trust Fund through various homeowner, homebuyer, multi-unit, and new housing development programs will meet the need. The City, through a Joint Powers Agreement with Ramsey County, allocates its ESG funding to community agencies that serve those experiencing homelessness and at-risk of being homeless, including residents with mental health and substance abuse disorders.

The City Homeless Assistance Response Team (HART) was a recently restructured its street outreach approach from enforcement-based approach to service-based to strategically address the needs of those experiencing homelessness. In coordination with Ramsey County and service providers, HART aligns City and County resources to ensure that every individual can be connected to services. The program includes a new response strategy to receiving calls and managing encampments and increased coordination among service agencies to provide assessments, support, and resources. The City, County, and partner organizations continue to look for better ways to work collaboratively and efficiently and align strategies to comprehensively approach outreach and service gaps. The CoC and Ramsey County are developing a Racial Equity Toolkit to address systemic barriers that unintentionally negatively impact BIPOC persons at-risk of or experiencing homelessness.

The City, in partnership with Ramsey County, and partner organizations developed the Familiar Faces pilot project. Intended to more effectively assist individuals with most frequent interaction with emergency services such as police, EMS and fire. The Familiar Faces program integrate mental health and county case management services into the existing outreach programs- offering crisis support and shelter and a wrap-around service planning model.

Saint Paul voters approved a new Residential Rent Stabilization ordinance in 2021 which took effect in May, 2022 and modifications in effect January, 2023. The rent-control ordinance limits rent increases within a 12-month period to 3% of the existing monthly rent, with a few exceptions, including for housing that is affordable. With more than 50% of residents as renters, the purpose of the ordinance is to retain or create new affordable rental housing particularly for lower income households and those on a fixed income.

Actions planned to foster and maintain affordable housing

In 2024, the City will continue to use the majority of its CDBG funding and all its HOME and ESG funding for affordable housing activities. Projects and programs that provide assistance for homebuyers, homeowner rehabilitation, rental rehabilitation, and new construction of affordable housing will be carried out by the City, its sub-grantees, non-profit and for-profit partners. Descriptions of the specific projects and programs can be found in the AP-38 Project Summary section of this document. In addition to the HUD-funded activities, the City will carry out housing development in conjunction with Minnesota Housing Finance Agency (MHFA), Metropolitan Council, Family Housing Fund, the Minnesota Department of Employment and Economic Development (DEED), the Minnesota Management and Budget Office (MMB), Saint Paul HRA, as well as private partners. The City will use the 60 percent tax credit rent for determining affordable rents for rental housing that is assisted with CDBG funding. HOME assisted developments will use the established HOME rents.

The 2040 Comprehensive Plan 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.”

The City’s Locational Choice Policy and Low-Income Housing Tax Credit (LIHTC) selection process also encourage a more equitable distribution of affordable housing citywide. The City’s HTF funding will be combined with existing City and federal resources for investment in deepening housing affordability, preserving existing affordable units, pursuing innovative housing stability strategies and establishing protections for renters and owners vulnerable to housing instability. City HRA mended its scoring structure for LIHTC applicants to provide added points to projects that provide housing targeted to residents earning no more than 30% AMI.

Families First Housing Pilot – Continues using the Housing Trust Fund and private donations, it provides a monthly rent supplement to very low-income families with children enrolled in 1 of 7 pilot elementary schools.

Community Land Trust pilot – Saint Paul has dedicated HTF funds to community land trusts to provide new pathways to homeownership for low- and moderate-income households and to promote long-term affordable community ownership.

Emerging and BIPOC Developer Training and Engagement Initiative - a partnership between the City, the Incremental Development Alliance (IncDev) and a volunteer Host and Advisory Committee that aims to increase the representation of emerging developers and leaders who are Black, Indigenous and People of Color (BIPOC) in the real estate development community.

St. Paul Downpayment Assistance and Homeowner Rehabilitation Programs – With Housing Trust Fund and CDBG funds, respectively the City provides low and moderate income homebuyers and homeowners with opportunities to build and retain wealth through homeownership.

Consistent with the City's 2040 Comprehensive Plan – Housing Chapter, affordable housing priorities are: preservation and production of rental housing affordable for those at or below 30% of AMI; create homeownership opportunities for households with low- and moderate-incomes; housing preservation for low-income elderly homeowners between 0-50% of AMI; and provide housing for special needs populations.

Actions planned to reduce lead-based paint hazards

The City continues to comply with HUD regulations concerning lead-based paint (LBP), including notifying applicants of the lead requirements, performing lead screening, requiring abatement by certified workers, and completing clearance testing on HUD-funded housing projects. The City will also continue to work with Ramsey County through referrals to its Lead Window Replacement Program for homes and rental units with young children (most at risk of lead poisoning), identified lead paint issues, and whose gross household income is at or below 80% AMI. The program is available to both owner-occupied housing and rental property owners.

Actions planned to reduce the number of poverty-level families

Critical to reducing poverty is workforce development and skills training and access to economic opportunity. The City's strong partnership with Ramsey County combines Workforce Innovation and Opportunity Act (WIOA) funds with state and local funds through a Joint Powers Agreement. Most of the workforce development investments are managed by Ramsey County Workforce Solutions and overseen by a City-County Workforce Innovation Board (WIB). The City invests directly in youth internships, scholarships for technology certification programs, workforce counseling and programs that support businesses and create jobs for low/moderate-income persons.

Department of Human Rights and Equal Economic Opportunity (HREEO) - deals with discrimination issues and provides access to economic opportunities through inclusive contracting practices and workforce development policies. The City of Saint Paul's Section 3 Program gives metro area low-income and public housing residents and businesses a connection to jobs, training and contracting opportunities. The City of Saint Paul is also the lead agency for the Twin Cities Section 3 Collaborative, which comprises of the cities of Saint Paul and Minneapolis, Minneapolis Public Housing Authority, Ramsey, Hennepin and Anoka Counties and Community Development Agencies of Washington and Dakota Counties.

Full Stack – a public-private collaboration with a renewed focus on using the power of tech and innovation to leverage equitable, sustainable, resilient economic development in Saint Paul.

Job Opportunity Fund – incentivizes businesses in areas of concentrated poverty (ACP50) to hire area residents. These areas are 50% or more people of color and 40% or more have household incomes less than 185% of poverty.

Minimum Wage – City's minimum wage ordinance is phased: Phase 2 on July 1, 2021, phase 3 in effect July 1, 2022. Phase 3 minimum wage, depending on size of business, will be from \$10.75 (micro business, 5 or fewer employees) to \$15/hour (macro business - more than 10,000 employees).

Office of Financial Empowerment - Saint Paul established the Office of Financial Empowerment (OFE) in 2019 because economic inequality is a whole-city crisis that demands a whole-city response. OFE is

working deliberately to help a new generation of Saint Paul residents repair those generational injustices and build equitable economic power for decades to come. OFE welcomes every new baby to our city with \$50 for college — a small but powerful investment in each child’s boundless potential — through the CollegeBound Saint Paul program. Saint Paul leads the citywide strategy around guaranteed income with our city’s youngest families, refugees and immigrants, and artists, with \$500 every month, no strings attached, because we believe in their future and their children’s. OFE leads on implementing Returning Home Saint Paul, a program to support residents returning from incarceration access housing.

Open for Business – a one-stop shop for start-up and existing businesses to get information and leverage resources. The program provides a pocket guide (in several languages) to starting a business in Saint Paul; connection with information and resources to start, move or expand a business; and help from a Business Project Facilitator as a guide through the permitting and licensing process of opening, expanding or moving to the City.

Strategic Investment Fund – attracts businesses to relocate to the City, targeting businesses with high-paying jobs, a record of profitability and participating in the Metropass public transit program.

People’s Prosperity Pilot - a guaranteed income pilot that provided 150 families with \$500 per month for 18 months. Phase 2 will serve 300 families for 24 months.

Actions planned to develop institutional structure

Saint Paul’s institutional structure gives the City the opportunity to partner with many organizations. In 2024, the City of Saint Paul Department of Planning and Economic Development (PED) will again work with other City departments, as well as other levels of government (county, state, federal), non-profit organizations, and private sector developers to plan and implement housing, economic development, and community development investments.

City Council passed Ordinance 22-1 amending City zoning codes for Phase 1 of a larger 1-4 Unit Infill Housing Zoning Study. Recommended amendments to City zoning code were made to reduce barriers to neighborhood-scale residential development with the goal to diversify housing options, increase residential density to address housing shortages and accommodate population growth. Phase 1 changes: ADUs allowed in non-owner-occupied housing units and eliminated minimum property size; eliminated minimum widths for single-family and two-family homes; replaced a standard minimum distance between buildings on a single lot to minimum fire separation as required per Minnesota Residential Code; simplified the formula to calculate front yard setbacks; clarified that a registered student dwelling may have 6 rather than 4 students living in a unit. Phase 2 will cover a broader scope and longer timeline.

City Council passed Ordinance 22-3 to expand the definitions for religious institution and community center to permit the most wanted and needed uses at these sites. Also included; expanded definition of

day care/preschool to allow for activities at existing and former religious sites; emergency housing at religious institutions with no zoning limits; overnight shelter at religious institutions for up to 25 adults; and homeless services at religious institutions subject to same regulations elsewhere. These changes establish a better process for land use applications for religious organizations and community centers.

The City and regional partners in the Fair Housing Implementation Council (FHIC), developed responsive strategies to Affirmatively Further Fair Housing within the Twin Cities. The 2020 Regional Analysis of Impediments to Fair Housing Choice (2020 AI) was finalized in January 2021, by the FHIC and The Lawyers Committee for Civil Rights Under Law (see Attachment D, Executive Summary). FHIC members are the cities of Coon Rapids, Bloomington, Eden Prairie, Minneapolis, Minnetonka, Plymouth, and Woodbury; the Counties of Anoka, Dakota, Hennepin, Ramsey, Washington; and the Community Development Agencies of Carver and Scott Counties. The 2020 AI identifies the causes for housing disparities, factors that reduce fair housing choice, the distribution of affordable housing (publicly funded and naturally occurring), displacement that disproportionately affects protected classes, the effects of gentrification on protected classes, integration and segregation, and disparities in access to opportunity as defined by HUD.

There remains a sustained focus across Mayoral administrations to address racial inequities. OFE has developed a framework for a citywide fair housing strategy and will be revisiting that framework to build out the strategy components, including use of the AI findings. The City's equity initiative drives each department to identify equity goals for their workforce, programs, services, and community impact.

Actions planned to enhance coordination between public and private housing and social service agencies

Saint Paul will continue to coordinate services with Ramsey County (the primary public service provider), and the Saint Paul Public Housing Agency (administrator of public housing and vouchers in Saint Paul) in 2024. The City through the FHIC will work with metro-wide governmental jurisdictions to affirmatively further fair housing regionally in the Twin Cities Metro Area.

The City and County are partnering closely on strategies and investments to address housing instability across the housing continuum, to provide supports to residents experiencing homelessness, and ensure that residents receive coordinated social services. The motivation behind a 2019 Joint Powers Agreement between the City and County suballocating City ESG dollars was this broader partnership, with the goal to achieve stronger coordination of shelter, street outreach and social services provided to Saint Paul residents by Ramsey County.

The City will continue to work with Community Development Corporations (CDCs), other nonprofit organizations, and the private sector (businesses, developers, social service agencies) to ensure maximum community benefit from housing, economic development, and community development investments.

The public/private partnership to build the new Dorothy Day Center, Higher Ground and an Opportunity Center to provide permanent supportive housing, connection with community service providers, a medical respite program, and coordination among institutional private health care providers and public health care providers, such as Health Care for the Homeless.

City economic development programs provide gap financing, which requires businesses seeking assistance to secure other public and private financing from banks, the state, Metropolitan Council, private foundations, personal capital, CDCs, and other lenders. This coordination ensures that funds leveraged are maximized and HUD-funding utilized where most needed. As a partner in workforce development through a Joint Powers Agreement with Ramsey County that establishes a joint Workforce Innovation Board (WIB), Saint Paul is regularly partnering with Ramsey County on training programs and wrap around social services for residents. The WIB is comprised of 50% business representatives, ensuring collaboration with employers. Through sector-based approaches, Saint Paul has entered into regional partnerships for job skills credentialing programs and provided scholarships to low-income residents using City funds.

Discussion:

There are many initiatives within the City of Saint Paul in the Mayor's Office, the Department of Planning and Economic Development, and its Housing Division. Like a diversified portfolio, a diversity of housing types and development strategies can increase local resiliency through changing economic times.

The City has established a local Housing Trust Fund; a minimum wage of \$15 per hour; broadened zoning flexibility to allow a greater variety of housing types; eliminated parking minimums from zoning restrictions; and formed the Office of Financial Empowerment. The City continues to hold regular procurement fairs to recruit Section 3 and W/M/SBE/ESBE businesses, requires use of Section 3 vendors for all construction/rehabilitation housing projects or other public construction projects. In November 2021, Saint Paul voters approved a rent stabilization ordinance to limit rent increases within a 12-month period to 3%. In a city where more than 50% of the residents are renters, the purpose of the ordinance is to keep or create new affordable rental housing particularly for lower income households and those on a fixed income.

Affirmatively Furthering Fair Housing - With its Consolidated Plan and Annual Action Plan submittals, Saint Paul is required to certify to HUD that it will affirmatively further fair housing, which includes completing an Analysis of Impediments (AI) to Fair Housing Choice. The City and regional partners in the Fair Housing Implementation Council (FHIC), developed responsive strategies to Affirmatively Further Fair Housing within the Twin Cities. The 2020 Regional Analysis of Impediments to Fair Housing Choice (2020 AI) was finalized in January 2021, by the FHIC and The Lawyers Committee for Civil Rights Under Law (see Attachment D, Executive Summary). FHIC members are the cities of Coon Rapids, Bloomington, Eden Prairie, Minneapolis, Minnetonka, Plymouth, and Woodbury; the Counties of Anoka, Dakota, Hennepin, Ramsey, Washington; and the Community Development Agencies of Carver and Scott Counties. The 2020 AI identifies the causes for housing disparities, factors that reduce fair housing

choice, the distribution of affordable housing (publicly funded and naturally occurring), displacement that disproportionately affects protected classes, the effects of gentrification on protected classes, integration and segregation, and disparities in access to opportunity as defined by HUD.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

The City expects funding allocations of near its 2023 allocations for these programs: \$6,727,557 for CDBG, \$1,902,041 in HOME funding and \$587,737 in ESG funding from HUD in 2024. In addition, the City estimates using about \$872,443 in CDBG program income and approximately \$594,495 in HOME program income. Program income is income directly generated from a CDBG or HOME program funded activity, such as loan repayments. Because the federal budget allocations for 2024 are not yet passed upon drafting this Action Plan, the City has a contingency plan for different funding amounts. Should the City receive an amount higher or lower than the estimates from last program year, all activities will be adjusted in direct proportion to the difference in actual allocations.

A consecutive period of three years, 2022, 2023 and 2024, is being used to determine that the minimum overall benefit of 70 percent of CDBG funds is used to benefit persons of low- and moderate-income.

The City of Saint Paul will allow, but not require, owners of HOME-funded housing developments to limit the beneficiaries or give preferences to a segment of the low-income population. This includes limiting units or giving preferences to the following low-income population segments: elderly and/or disabled, victims of domestic violence, and chronically homeless.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	872,443
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	872,443

Other CDBG Requirements

1. The amount of urgent need activities	0
Annual Action Plan	72
2024	

2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.

96.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The City does not plan any additional forms of investment beyond eligible uses of HOME funds identified in 92.205.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City of Saint Paul HOME Program Resale/Recapture Policy is being reviewed.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City of Saint Paul HOME Program Resale/Recapture Policy is being reviewed.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City does not anticipate refinancing existing debt secured by multifamily housing that is rehabilitated with HOME funds.

Emergency Solutions Grant (ESG)

Reference 91.220(l)(4)

1. Include written standards for providing ESG assistance (may include as attachment)

Ramsey County in consultation with HUD's technical support representative developed an ESG and

ESG-CV Program Manual to further help the County with developing written standards for the ESG Program and incorporated into the ESG Action Plan, see Attachment G.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Coordinated Entry is the process to access supportive housing for individuals and families experiencing homelessness. Supportive housing resources are extremely limited. Because of this, individuals and families with the highest vulnerability, most significant service needs, and longest history of homelessness are prioritized. Housing is not guaranteed through this process.

To be eligible for a housing assessment in Ramsey County and within the City of Saint Paul, households must meet one of the following homeless definitions: a) HUD Homeless - staying in shelter, outside, or in other places not meant for human habitation; exiting an institution where person/household resided for 90 days or less and who resided in shelter or other place not meant for human habitation prior to entering the institution; and/or fleeing or attempting to flee domestic violence; b) Long Term Homeless (LTH) - lacking a permanent place to live continuously for a year or more or at least four times in the past three years. Time spent in institutional care or correctional facility (if longer than 90 days) shall be considered "excluded time" and does not count toward length of time a household has been homeless. Episodes of homelessness can include time doubled-up or couch-hopping. Doubled-up or couch-hopping is considered homeless if that arrangement has persisted less than 12 months; c) For Youth (ages 24 and younger) ONLY: Minnesota Homeless - any unaccompanied youth or youth aged heads of households that is without a permanent place to live that is fit for human habitation.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The City has a Joint Powers Agreement with Ramsey County to allocate its ESG funds to programs in alignment with other local, state, and federal funding sources through the Ramsey County CoC. For City ESG funding, the CoC Coordinator releases a letter of interest (LOI) to the general public and through the CoC listserv. The CoC funded Planner and Evaluation Analyst creates a scoring matrix and scoring evaluation. The CoC Ranking Committee then reads all applications and scores based on how applicants respond to the LOI. The CoC Ranking Committee meets to review applications, score and rank the projects for funding and makes the final decision on which projects to fund. The CoC Governing Board reviews the selected candidates and Ramsey County Housing Stability Department then enters into contracts with the agencies.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The County and CoC through ongoing meetings, monitoring, data collection, evaluations, recruitment of persons with lived experience of homelessness and in consultation with services providers, collects information to address policy and funding decisions for improvements to ESG funded activities, facilities and services. The CoC Ranking Committee now has two active individuals who very recently experienced homelessness. These individuals just completed their ranking and recommendations of the ESG FY 2022 contract awards, which are currently under negotiation and development.

5. Describe performance standards for evaluating ESG.

The performance standards for evaluating ESG funded programs includes but are not limited to the ranking and scoring process; assessing how funding is spent, drawdowns; ESG compliance through monitoring visits; and any required follow-up meetings with providers if there are critical findings discovered in monitoring visits. Monitoring guides and checklists are incorporated into the County's ESG/ESG-CV Program manual and utilize the same elements of the HUD CPD Monitoring handbook (see Attachment G).

Attachments

Budget Summary

ATTACHMENT A

Projects by Financing Source

Community Development Block Grant	2023 Adopted	2024 Adopted	2025 Tentative	2026 Tentative	2027 Tentative	2028 Tentative	Total (not including priors)
Acquisition Fund for Community Investment	220,000	220,000	220,000	-	-	-	440,000
Black Arts + Tech Center	-	210,000	210,000	-	-	-	420,000
Business Investment and Revitalization Fund	100,000	-	-	-	-	-	-
Business Investment Fund	190,000	190,000	190,000	-	-	-	380,000
Carty Park Play Area	-	49,000	-	-	-	-	49,000
Cerenity Senior Care- Humbolt Skilled Nursing Facility Rehabilitation	-	78,000	78,000	-	-	-	156,000
Citywide 30% AMI Housing Program	245,000	245,000	245,000	-	-	-	490,000
Citywide Economic Development Program	-	75,000	75,000	-	-	-	150,000
East Side Home Improvement Revolving Loan Fund	325,000	300,000	300,000	-	-	-	600,000
East Side Homeownership Initiative	225,000	225,000	225,000	-	-	-	450,000
Hazel Park Phase II	-	100,000	100,000	-	-	-	200,000
Homeowner Rehab Program	795,000	725,000	725,000	-	-	-	1,450,000
Housing Real Estate Multi-Unit Development Fund	530,000	480,000	480,000	-	-	-	960,000
Inspiring Communities	300,000	-	-	-	-	-	-
North End Economic Development	-	100,000	100,000	-	-	-	200,000
North End Revitalization Fund	210,000	200,000	200,000	-	-	-	400,000
Prospect Park Play Area	350,000	113,000	162,000	-	-	-	275,000
Rondo Community Land Trust Homebuyer Initiated Program - Rehab Gap Pro	-	150,000	150,000	-	-	-	300,000
St. Paul Green Line Home Improvement Loan Fund	210,000	200,000	200,000	-	-	-	400,000
St. Paul Home Improvement Loan Fund	210,000	200,000	200,000	-	-	-	400,000
Vacant & Hazardous Building Demolition	90,000	140,000	140,000	-	-	-	280,000
Total Community Development Block Grant	4,000,000	4,000,000	4,000,000	-	-	-	8,000,000



June 30, 2023

To: The Honorable Melvin Carter III and Members of the Saint Paul City Council

From: Darren Tobolt, Chair

REPORT OF THE SAINT PAUL LONG-RANGE CAPITAL IMPROVEMENT BUDGET COMMITTEE

The Saint Paul Long-Range Capital Improvement Budget (CIB) Committee hereby submits its recommendations for the 2024 Capital Improvement Budgets, and Community Development Block Grant (CDBG) project funding. For FY24, the committee has voted to recommend the tentative funding levels recommended in previous budget cycles, but with the following changes to tentative funding levels in 2025:

- 2025 CIB Bond Project, Hazel Park Phase II: \$200,000
- 2025 Children's Play Area Improvements Annual Programming: \$31,000

In addition, the committee has reviewed all proposals submitted for CDBG funding and recommends the following organizations for funding in 2024 and 2025:

- 30,000 Feet: \$420,000
- Cerenity Senior Care- Humbolt: \$156,000
- City of Saint Paul Department of Safety and Inspections (DSI): \$180,000
- City of Saint Paul- Parks Department: \$624,000
- City of Saint Paul Planning & Economic Development (PED): \$3,490,000
- Dayton's Bluff Neighborhood Housing Services: \$1,050,000
- District 6 Planning Council: \$200,000
- East Side Neighborhood Development Company, Inc. (ESNDC): \$380,000
- NeighborWorks Home Partners: \$1,200,000
- Rondo Community Land Trust: \$300,000

This budget assumes approximately Capital Improvement Bonds of \$4.546 million in 2024 and 4.147 million in 2025, \$4 million per year of Community Development Block Grants (CDBG), and \$14.155 million of Municipal State Aid (MSA) for FY24.

The Saint Paul CIB process is designed to engage residents in evaluating capital needs in the City. In 2019, we launched a new CIB process to focus more strongly on:

1. **Equity and inclusion:** Budgeting decisions reflect our commitment to equity. The CIB Committee supports identifying ways to invite more voices to the table and ensure investments are distributed equitably throughout the City.
2. **Strategic investments:** Capital investments all feed into a larger, more comprehensive strategic framework that takes advantage of data and ensures maximum return on investment.
3. **Fiscal responsibility:** Existing infrastructure such as roads, bridges, and sidewalks – as well as existing parks and libraries facilities – are well-tended. Maintenance is prioritized.

2023 was the first year of the two-year cycle separating city led and community led projects, when City Department Projects are selected. There was also less bonding capacity available because we chose to bond more in the last City Department cycle which took place in 2021 to take advantage of the lower interest rates to

ATTACHMENT A

complete some large projects like the North End Community Center. The committee took the time to reevaluate our annual programs and deferred maintenance projects. We look forward to a discussion with staff to find ways to better involve the public and truly co-govern with the principles laid out above. As we continue to utilize the new process, it was amazing to see community come together and highlight the needs of the city and hear the innovative and inspiring ideas during the CDBG process. While we were not able to fund every project, there was light shed on disparities across the city on basic infrastructure needs residents should have to feel safe. There was energy and passion around building space for connection through outdoor activities. There was also a clear desire for investment in traffic calming and making non-motorized transportation safer. Moving forward it is the hope of the Committee that we continue to work together to address these needs, push for basic infrastructure for safety, and continue to raise awareness that ALL people deserve value and to have their safety honored. This is especially critical at a time when we are moving through life in a pandemic and continued racial injustices.

As always, the Committee appreciates your support of our efforts. It is a pleasure to serve our City and its Residents.

SAINT PAUL LONG-RANGE CAPITAL IMPROVEMENT BUDGET COMMITTEE MEMBERS

Abdi Ahmed	Jack Fei	Pat McQuillan	Ryan Vue
Abshir Ali	Raymond Hess	Darren Tobolt	Pang Yan
Lauren Dees-Erickson	Jon Kelly	Elsa Vega Perez	

SAINT PAUL LONG-RANGE CAPITAL IMPROVEMENT BUDGET COMMITTEE PUBLIC HEARING COMMENTS SUMMARIZED

Monday, June 12, 2023, 5 – 7 pm | Rondo Community Library

2023 Public Hearing: Chair Tobolt called speakers up from the speaker signup sheet, each speaker was given two minutes to speak. Comments below summarized by project supported.

- **NENO:** Kerry Antrim spoke in favor of the projects submitted by NENO, discussed their organizational capacity and history in their projects and work with the STAR Board and other City programs and potential funders.
- **NeighborWorks Home Partners:** Beth Hyser presented in favor of project and, project goals, and mission.
- **30,000 Feet:** Vanessa Young testified in favor of the proposal and detailed current building state and improvement needs.
- **Parks:** Alice Messer presented on the importance of parks projects and the history of funding, as well as the removal of the playground annual program funding in last few years.
- **Cerenity Senior Care, Humboldt Building Improvements:** Julie Thelin presented on the importance of Elevator modernization and door upgrades and discussed these as first priority for funding.
- **East Side Neighborhood Organization:** Blia Vang: and Som Lee from Froggies farm restaurant spoke in support of the east side neighborhood organization and detailed their experience working with the organization.
- **East Side Neighborhood Organization:** Anna DeJoy spoke in favor of the proposal and detailed the difficulty and expense of building repair and the importance of the work done by ESND.
- **Parks, Midway Peace Park:** Demetrius Shaw and Leah Sullivan discussed play area replacement fund request as well as parks CDBG funding, siting the Midway Peace Park specifically. They would like to see a park they love continue to grow and flourish in years
- **Saint Paul Parks Conservancy:** Michael-jon Pease spoke in favor of the Parks CDBG proposals as well as reinstating the play area replacement fund for 2024 2025

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.

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.

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;
- 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

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
Department of Planning and Economic Development
Beth Ulrich, Grants Manager
1100 City Hall Annex
25 West Fourth Street
Saint Paul, MN 55102
(651) 266-6689
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.

Cycle Year 1: City Capital Improvement Plan (CIP) Development Available: [Total Capital Improvement Budget] minus \$500K

JULY - MARCH

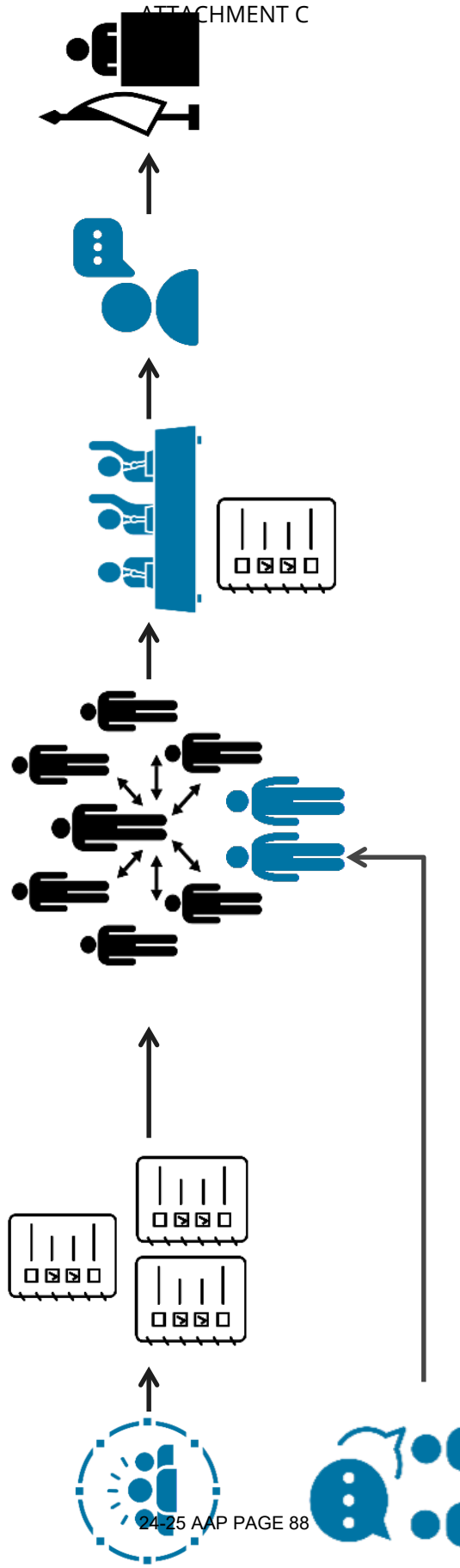
MARCH - APRIL

APRIL - JUNE

AUGUST



Community Touchpoint



City Departments
draft 5-year
capital plans

Working group uses
data and engagement to
create citywide 5-year
plan

CIB Committee
recommends project
priorities for 2-year
funding cycle

Capital Improvement Plan Year 2: Community Created Projects

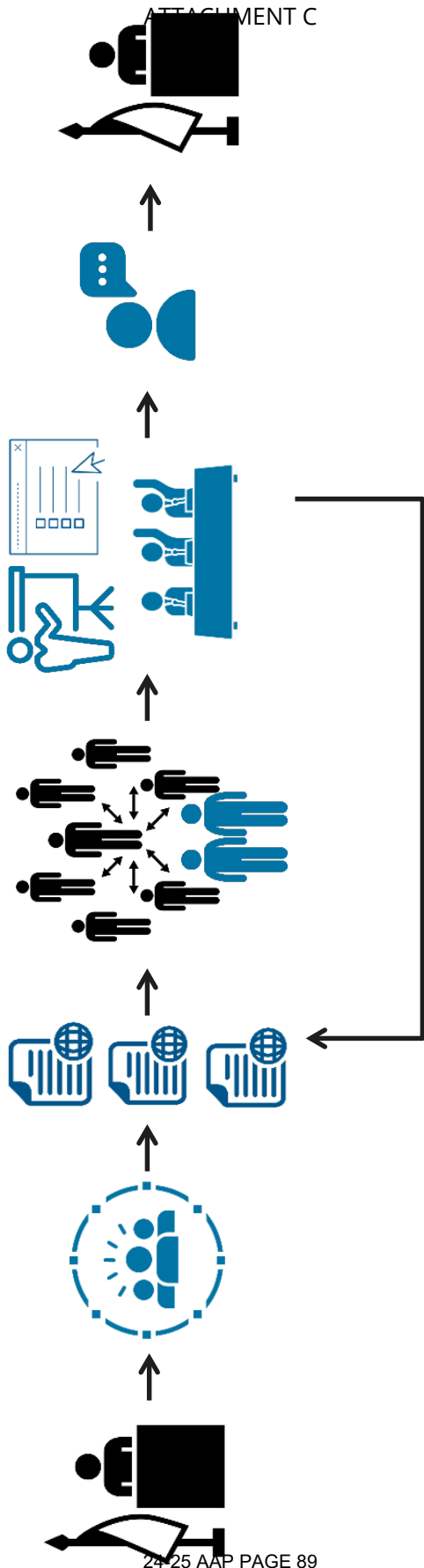
AUGUST - FEBRUARY

FEBRUARY - MARCH

APRIL - MAY

MAY - JUNE

Engagement Opportunity



Mayor outlines priorities. City solicits community applications. Idea platform opens early February

Workshops are held. Idea platform closes. Working group evaluates for eligibility and how well proposals apply priorities and address specific principles

CIB Committee holds a public hearing and recommends project priorities for 2-year funding cycle

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 (R/ECAPs).....	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 furthering 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 document 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 38th 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.

[View Entire Document](#)

CITY OF SAINT PAUL CONSTRUCTION AND REHABILITATION PROPERTY STANDARDS

I. PROPERTY PROVISIONS

A. PROGRAM INTENT AND HOUSING VALUES

Our Program's goal is to eliminate neighborhood blight through renovation and demolition, while providing low and moderate-income families with safe, secure and affordable housing.

The values that flow from this goal include:

- Performance and durability
- Historically sensitive exteriors
- Economic life-cycle costs
- Affordable operating costs
- Competitive project appropriate costs
- Lead-safe housing

B. APPLICABLE LAWS AND REGULATIONS

Our Program intends to construct and maintain homes in accordance with the following statutory and regulatory requirements:

- City of Saint Paul Building Code
- Applicable State of Minnesota Building Codes and Regulations
- Federal Housing Quality Standards (I will check to see if we replace with UPCS)
- HUD Lead-Based Paint Regulation (24 CFR Part 35)
- Accessibility requirements as applicable, in accordance with Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and the Fair Housing Act.

C. FREQUENCY OF INSPECTION

The following inspections are required for all projects utilizing HOME funds.

- Initial inspection
- Progress inspections with draw requests
- Final inspection

D. HEALTH AND SAFETY

The rehabilitation standard must specify the life-threatening deficiencies that must be addressed immediately if a housing unit is occupied.

E. DISASTER MITIGATION STANDARDS

Standards shall be applied in accordance with State and local requirements or as established by HUD, where they are needed to mitigate the risk of potential disasters, such as earthquakes, hurricanes, flooding, and wildfires.

F. CONTRACT DOCUMENTS

Once the scope of work is finalized and approved by City, the Borrower shall provide for approval complete specifications and drawing sets which set forth in detail the requirements of the project. The City will prepare the Home Repayment Loan Agreement for the project.

G. DEVELOPER / CONTRACTOR DETERMINATION

Projects shall be subject to the City's Two Bid policy. All contractors and subcontractors providing project services shall not be listed on the Federal Service Desk's System for Award Management debarment listing.

II. REHABILITATION STANDARDS

New rehabilitation projects shall meet State and Local codes, ordinances, and zoning requirements. In the absence of an applicable State or Local code for new construction, HOME-assisted projects must meet the International Code Council's (ICC's) International Residential Code (IRC) or International Building Code (IBC), whichever is applicable to the type of housing being developed.

The following additional standards are incorporated or specified:

- Disaster mitigation standards, in accordance with State and local requirements or as established by HUD, where they are needed to mitigate the risk of potential disasters (such as earthquakes, hurricanes, flooding, and wildfires).
- PJs shall improve project oversight including:
 - Review and approve written cost estimates, construction contracts, and construction documents.
 - Conduct construction progress and final inspections to ensure that work is done in accordance with the applicable codes, the construction contract and other constructions documents.

The following standards shall be adhered to if receiving City assistance for new construction:

A. MAJOR SYSTEMS

The PJ must require an estimate of the remaining useful life of major systems. Major systems include structural support, roofing, cladding, weatherproofing (e.g., windows, doors, siding, gutters), plumbing, electrical and heating, ventilation, and air conditioning.

This must be done with a capital needs assessment for projects with 26 or more units. If the remaining useful life is less than the affordability period, the PJ must require replacement reserve deposits to ensure that the project's major systems and physical need can be adequately maintained and addressed throughout the affordability period.

B. UPCS (Uniform Physical Condition Standards)

In accordance with 24 CFR 5.703, UPCS are applied to rehabilitation in the absence of State and local codes in the pre-2013 rules.

C. SITE IMPROVEMENTS

SOIL TREATMENT FOR LEAD HAZARDS

Repair Standard: Interim standards - 1 year - will require monitoring to ensure continued effective control methods. Replacement- 20 years.

Play Area: Bare soil play areas shall be tested for lead content. Any bare soil over 400 PPM in lead shall be covered with a reinforced landscape cloth and impermanent surface covering; e.g., gravel, bark, sod, or artificial turf containing not more than 200 PPM. Loose impermanent covering, such as bark or gravel, shall be applied in a thickness of not less than six (6) inches.

Other Bare Soil: Bare soil outside of play areas shall be tested for lead content. Any bare soil over 2000 PPM in lead, and totaling more than nine (9) square feet per property, shall be covered with a reinforced landscape cloth or other impermanent surface covering containing not more than 200 PPM in lead, an interim control measure which prevents children's access to the area soil. Soil lead levels above 5000 PPM usually requires abatement.

TREES

Repair Standard: Minimum Life: N/A

Trees that are too close to the structure, or threaten the structure, shall be trimmed or removed.

Replacement Standard: N/A

OUT BUILDINGS

Repair Standard: Minimum Life: 1 year

Unsafe and blighted structures, including out buildings, sheds, garages and barns, will be removed if it is not financially feasible to complete the repairs required to make them structurally sound and leak free with lead hazards stabilized.

Replacement Standard: N/A

No replacement of out buildings is allowed.

PAVING AND WALKS

Repair Standard: Minimum Life: 5 years

Badly deteriorated essential paving, such as front sidewalks, will be repaired to match. Non-essential deteriorated paving, such as sidewalks that are unnecessary, will be removed and appropriately landscaped.

Replacement Standard: Essential walks and drives shall be replaced with concrete.

D. EXTERIOR SURFACES

EXTERIOR LEAD HAZARDS

Repair Standard: All exterior paint shall be stabilized using lead-safe practices.

Replacement Standard: Lead components shall be replaced, or the paint removed, to create a lead-free exterior.

EXTERIOR STEPS AND DECKS

Repair Standard: Minimum Life: 5 years

Steps, stairways, and porch decks will be structurally sound, reasonably level, with smooth and even surfaces.

Replacement Standard: 20 years

New steps and stairways shall be constructed of preservative-treated lumber in conformance with the CAB Code. Porch decks shall be replaced with tongue and groove pine.

EXTERIOR RAILINGS

Repair Standard: Minimum Life: 5 years

Handrails will be present on one side of all interior and exterior steps or stairways, with more than two risers, and around porches or platforms over 30" above ground level. Railing repairs will be historically sensitive.

Replacement Standard: Minimum Life: 10 Years

Railings shall be wrought iron or preservative-treated lumber.

EXTERIOR CLADDING

Repair Standard: Minimum Life: 10 Years

Siding and trim will be intact and weatherproof. All exterior wood components will have a minimum of two continuous coats of paint, and no exterior painted surface will have any deteriorated paint.

Replacement Standard: Minimum Life: 20 Years

Historically sensitive vinyl siding over house wrap.

EXTERIOR PORCHES

Repair Standard: Minimum Life: 10 years

Unsafe or unsightly porches will be repaired to conform closely to historically accurate porches in the neighborhood.

Porch repairs will be structurally sound, with smooth and even decking surfaces.

Replacement Standard: Minimum Life: 15 Years

Deteriorated porches shall be rebuilt with preservative treated structural lumber and tongue and groove pine decks.

EXTERIOR HARDWARE

Replacement Standard: N/A

Minimum Life: 10 Years

Every dwelling unit will have a mailbox, or mail slot, and minimum three (3) inch high address numbers at the front door.

E. FOUNDATIONS AND STRUCTURE

FOUNDATIONS / FLOOR SYSTEMS / STAIRS

Repair Standard: Minimum Life: 20+ Years

Foundations / Floor Systems / Stairs will be sound, reasonably level, and free from movement.

Replacement Standard: 50 Years

Construct to comply with building code and construction documents.

STRUCTURAL WALLS

Repair Standard: Minimum Life: 50 Years

Structural framing and masonry shall be free from visible deterioration, rot or serious termite damage, and be adequately sized for current loads. Prior to rehab, all sagging floor joists or rafters will be visually inspected, and significant structural damage and its cause will be corrected.

Replacement Standard: 50 Years

Construct to comply with building code and construction documents.

FIREWALLS

Repair Standard: Minimum Life 25 Years

Party walls shall be maintained without cracks and plaster deterioration, and covered with 5/8" type X gypsum, glued and screwed to studs.

Replacement Standard: Minimum Life: 25 Years

When frame walls and floors adjoining together dwellings are gutted, new wall finish installation will conform to local requirements for fire ratings.

F. WINDOWS AND DOORS

EXTERIOR DOORS

Repair Standard: Minimum Life: 10 Years

Doors shall be solid, weather-stripped, operate smoothly, including a peep site, a dead bolt and entrance lock set.

Replacement Standard: Minimum Life: 10 Years

All replacement doors, at the front of the property, will be historically sensitive. Steel six-panel doors may be installed at entrances not visible from the front street. Dead bolt locks will be installed on all doors.

WINDOWS

Repair Standard: Minimum Life: 10 Years.

All single glaze windows shall be covered by a storm sash, in which the meeting rail matches up with the prime window. Operable windows shall have a locking device and mechanism to remain partially open.

Deteriorated windows with lead paint should be replaced whenever the budget allows.

Replacement Standard: Minimum Life: 20 Years

Double-glazed, double or single hung, PVC, Lowe, one over one, with historically sensitive snap-in grids and a minimum R-value 2.

Bedrooms, kitchens and baths shall have one operable window with a screen.

INTERIOR DOOR / PLACEMENT

Repair Standard: Minimum Life: 10 Years

All bedrooms, baths and closets shall have well operating doors.

Replacement Standard: Minimum Life: 10 Years

Hollow core, pressed wood product with brass plated bedroom lockset.

G. ROOFING

PITCHED ROOFS

Repair Standard: Minimum Life: 10 Years

Missing and leaking shingles and flashing shall be repaired on otherwise functional roofs.

Replacement Standard: Minimum Life: 25 Years

Fiberglass asphalt, three-tab, Class A shingles weighing at least 200 lbs. and up to 240 lbs., with a pro-rated 25- year warranty with continuous ridge vents.

FLAT AND LOW SLOPE ROOFING

Repair Standard: Minimum Life: 10 Years

Built-up roofing, flashing and accessories shall be repaired with a five-year leak free warranty.

Replacement Standard: Minimum Life: 20 Years

Fully adhered EPDM over one-inch insulation board, or over plywood.

H. INSULATION AND VENTILATION

INSULATION / VAPOR BARRIER

Replacement Standard: Minimum Life: 15 Years

Attic areas and crawl space will be insulated with vapor barrier. The goal for attic insulation is R-45, and for crawl space R-19. Frame walls will be insulated with vapor barrier if the wall finish is removed. Plastic vapor barriers will be placed over bare soil in crawl spaces.

ATTIC VENTILATION

Replacement Standard: Minimum Life: 20 Years

Attics will be ventilated with a minimum of one (1) square foot of free vent for each 300 square feet of roof area to comply with building code.

KITCHEN VENTILATION

Replacement Standard: Minimum Life: 5 Years

Range hoods, or exhaust fans, shall be exterior ducted. 150 CFM, 10 sone or less.

BATH VENTILATION

Replacement Standard: Minimum Life: 5 Years

Exterior ducted 60 CFM, 6 sone or less, with separate switch in all full baths.

I. INTERIOR STANDARDS

LEAD-CONTAINING COMPONENTS

Repair Standard: Lead-containing walls, trim, doors and cabinets must have any deteriorated paint stabilized using lead-safe measures. As an alternative, a liquid encapsulant can be applied on such components when the surface is deemed suitable for such coatings.

Replacement Standards: At the owner's request, when funding is sufficient, lead-containing walls, trim, doors and cabinets identified during a lead-paint inspection can be replaced or enclosed to comply with public health requirements.

FLOORING

Repair Standard: Minimum Life: 5 Years

Bathroom and kitchen floors shall be rendered smooth and cleanable using polyurethane, or by being covered with water-resistant vinyl flooring. Damaged wood floors will be repaired.

Carpet shall be clean and sanitary without excessive deterioration.

Basement floors shall be continuous concrete.

Replacement Standard: Minimum Life: 7 Years

Baths shall receive sheet vinyl over plywood underlayment. Kitchens shall be sheet vinyl over plywood underlayment. New basement slabs shall be at least three (3) inches thick.

Carpet shall be designed to be easily cleaned with durability to serve 7 years.

CLOSETS

Repair Standard: Minimum Life: 15 Years

All bedrooms shall have closets with a door, clothes rod and shelf.

Replacement Standard: Minimum Life: 15 Years

All bedrooms shall have four (4) foot long by two (2) wide closets with bi-fold door and wire shelves.

INTERIOR WALLS AND CEILINGS

Repair Standard: Minimum Life: 10 Years

All holes and cracks shall be repaired to create a continuous surface and any deteriorated paint should be stabilized using lead-safe measures.

Replacement Standard: Minimum Life: 10 Years

Walls shall be plumb, ceilings level with a smooth finish on at least 1/2' gypsum.

Additional Reference: American Gypsum Association

CABINETS AND COUNTERTOPS

Replacement Standard: Minimum Life: 10 Years

Doors, drawers and hardware shall be maintained in sanitary condition.

Countertop surfaces shall be maintained in a sanitary Condition.

Cabinet surfaces shall be free of loose paint or varnish.

APPLIANCES

Replacement Standard: Minimum Life: 7 Years

Appliances shall meet energy efficiency standards.

HAZARDOUS MATERIALS

Repair Standard: Minimum Life: N/A

Asbestos and lead paint hazards, when identified, shall be addressed in conformance with applicable local, state and federal laws.

Rehabilitated properties shall be cleaned to pass a lead dust clearance test to the levels prescribed by HUD regulations.

J. ELECTRIC

SERVICE

Repair Standard: Minimum Life: 15 Years

Service capacity must be designed to provide for building size and number of units.

Replacement Standard: Minimum Life: 15 Years

Service capacity must be designed to provide for building size and number of units.

EXTERIOR ELECTRIC

Repair Standard: Minimum Life: 7 Years

All entrances will be well lighted and either switched at the interior side of the door, or the light will be controlled by a photoelectric cell. Motion activated security lighting will be installed at the rear and sides of properties where it will increase safety. All dwelling units will have at least one exterior, CFCI protected, electrical receptacle.

Replacement Standard: N/A

INTERIOR ELECTRICAL DISTRIBUTION

Replacement Standard: Minimum Life: 15 Years

Comply with National Electric Code.

Exposed knob and tube shall be replaced. Every room will have a minimum of two (2) duplex receptacles, placed on separate walls and one (1) light fixture or receptacle switched at each room entrance. Where the source wiring circuit is accessible (i.e. first floor above basements, in

guttered rooms, etc.), receptacles will be grounded. All switch receptacles and junction boxes shall have appropriate cover plates. Wiring shall be free from hazard and all circuits shall be properly protected at the panel. Floor receptacles shall be removed and a metal cover plate installed.

GROUND FAULT CIRCUITS

Replacement Standard: Minimum Life: 15 Years

Basement and kitchen receptacles within six (6) feet of a sink, all bath receptacles and at least one (1) exterior receptacle shall be protected by a GFCI.

KITCHEN ELECTRIC DISTRIBUTION

Replacement Standard: 15 Years

Permanently installed stoves, refrigerators, freezers, dishwashers and disposals, washers and dryers shall have separate circuits sized to NEC. Two (2) separate 20-amp counter circuits are required within each kitchen area.

STAIRWELL LIGHTING

Replacement Standard: Minimum Life: 15 Years

All common halls and stairways between living space must be well lighted with a fixture controlled by three-way switches at both ends of the hall or stairway.

FIRE ALARM AND SPRINKLER SYSTEMS

Replacement Standard: Minimum life: 15 Years

Fire Alarm and Sprinkler Systems shall be installed and maintained to comply with relevant provisions in the 2007 Minnesota State Fire Code.

Fire Alarm and Sprinkler Systems shall be inspected by City of Saint Paul Fire Code inspectors at Code required time intervals.

K. PLUMBING SYSTEM

WATER SUPPLY

Replacement Standard: Minimum Life: 30 Years

All fixtures must be supplied with 3 gallon/minute water flow. All inoperable or leaky main shut off valves shall be replaced. Lead pipe and exposed galvanized pipe shall be replaced with copper pipe.

DRAIN AND WASTE VENT LINES

Replacement Standard: Minimum Life: 30 Years

Waste and vent lines must function without losing the trap seal.

PVC replacement lines shall be installed to Code

PLUMBING MINIMUM EQUIPMENT

Every dwelling unit shall have a minimum of one single bowl sink with hot and cold running water in the kitchen, and at least one bathroom containing a sink, and a shower/tub unit, both with hot and cold running water and a toilet.

PLUMBING FIXTURES

Replacement Standard: Minimum Life: 10 Years

All fixtures and faucets shall have all components working.

Include single lever, metal faucets and shower diverters with 5-year drip-free warranty.

Include ceramic toilets, double bowl stainless steel sinks, fiberglass tub surrounds and steel enameled 5' tubs.

WATER HEATERS

Replacement Standard: Minimum Life: 10 Years

Design and install water heater system to provide for building size and number of units to comply with Code and meet energy efficiency standards.

L. HVAC

HEATING PLANT AND COMMON AREA MAKE UP AIR SYSTEMS

Replacement Standard: Minimum Life: 20 Years

Design and install a HVAC system to include a distribution system for forced air/hot water systems to provide for building size and number of units to comply with Code and meet energy efficiency standards. Include insulation on distribution systems to comply with energy efficiency standards.

CHIMNEY REPAIR

Repair Standard: Minimum Life: 15 Years

Unsound chimneys shall be repaired or removed. When chimneys are to be used for combustion ventilation, they shall be relined.

Replacement Standard: Minimum Life: 20 Years

Fireplace flues may not be reconstructed in this program. Replacement furnace flues shall be metal double or triple walled to comply with code and recommendations of manufacturer.

AIR CONDITIONING

Repair Standard: Minimum Life: 3 Years

Air conditioning shall be part of the building HVAC system to comply with Code and energy efficiency standards.

Window air conditioners shall meet energy efficiency standards.

M. ELEVATOR SYSTEMS

ELEVATORS

Repair/Replacement Standard: Minimum Life: 30 Years

Elevator systems shall be designed, installed and maintained to comply with Minnesota State Building Code Section 1307: Elevators

Elevator systems shall be designed to accommodate the number of units in a building.

Elevator systems shall be inspected by City of St. Paul DSI elevator inspectors at Code required time intervals.

III. NEW CONSTRUCTION STANDARDS

New construction projects shall meet State and Local codes, ordinances, and zoning requirements. In the absence of an applicable State or Local code for new construction, HOME-assisted projects must meet the International Code Council's (ICC's) International Residential Code (IRC) or International Building Code (IBC), whichever is applicable to the type of housing being developed.

The following additional standards are incorporated or specified:

- Accessibility requirements as applicable, in accordance with Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and the Fair Housing Act.
- Disaster mitigation standards, in accordance with State and local requirements or as established by HUD, where they are needed to mitigate the risk of potential disasters (such as earthquakes, hurricanes, flooding, and wildfires).
- PJs shall improve project oversight for new construction. PJs must:
 - Review and approve written cost estimates, construction contracts, and construction documents.
 - Conduct construction progress and final inspections to ensure that work is done in accordance with the applicable codes, the construction contract and other constructions documents.

The following new construction standards involving site design, building design, mechanical and electrical systems, and building components shall be adhered to if receiving City assistance for new construction:

H. SITE DESIGN

Site improvements shall comply with all State and Local codes, ordinances, and zoning requirements associated with grading/drainage, parking, garages, sidewalks, play equipment/area, signage, and landscaping.

I. BUILDING DESIGN

The building design shall be reasonably appropriate for the intended site, resident population, and anticipated market and shall be in compliance with all State and Local codes, ordinances, and zoning requirements.

J. MECHANICAL AND ELECTRICAL SYSTEMS

Housing shall have plumbing, mechanical, sprinkler, elevator, and electrical systems that comply with all State and Local codes, ordinances, and zoning requirements.

K. BUILDING COMPONENTS

City encourages the advancement of green/sustainable building strategies designed in accordance with the 2015 Enterprise Green Communities Criteria.

L. SCHEMATIC DESIGN CONCEPT

The Borrower is required to develop a reasonable schematic design concept and cost estimate which conforms to all applicable City regulations

IV. ACQUISITION

When HOME funds are used to purchase existing rental housing, such housing must be in good condition or it must be rehabilitated to ensure that the housing is in standard condition at the time of project completion.

CITY OF SAINT PAUL, MINNESOTA
RESIDENTIAL ANTI-DISPLACEMENT
AND RELOCATION ASSISTANCE PLAN

1. Steps Taken to Minimize Displacement:

The City will take the following steps to minimize the displacement of families and individuals from their homes and neighborhoods as a result of any activities assisted with Community Development Block Grant (CDBG) and HOME Investments Partnership Program (HOME) funding:

- (A) Consider at the feasibility of rehabilitation before pursuing the demolition of unsafe, dilapidated properties.
- (B) Consider alternate locations for new development that requires the demolition of properties and relocation of families and individuals.

2. Relocation Assistance:

Each displaced person is entitled to choose to receive either assistance at the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) levels (49 CFR part 24), or the following relocation assistance:

- (A) Advisory services at the levels described in 49 CFR part 24, subpart C. Tenants shall be advised of their rights in such a matter that will provide a choice between relocating within their neighborhood and other neighborhoods.
- (B) Payment for moving expenses at the levels described in 49 CFR part 24, subpart D.
- (C) The reasonable and necessary cost of any security deposit required to rent the replacement dwelling unit, and for credit checks required to rent or purchase the replacement dwelling unit.
- (D) Interim living costs. The City shall reimburse a person for the actual reasonable out of pocket costs incurred with temporary relocation if the person must relocate temporarily, including moving expenses and increased housing costs.
- (E) Replacement housing assistance. Persons are eligible to receive one of the following two forms of replacement housing:
 - (1) Rental assistance equal to 60 times the amount necessary to reduce the monthly rent and estimated average monthly cost of utilities for a replacement dwelling to the Total Tenant Payment. All or a portion of this assistance may be offered through a certificate or housing voucher for rental assistance. If a certificate or voucher is provided to a person, the City must provide referrals to comparable replacement units where the owner is willing to participate in the Section 8 Program. To the extent that cash assistance is provided, it will be provided in installments.

- (2) If the person purchases an interest in a housing cooperative or mutual housing association and occupies a decent, safe, and sanitary dwelling in the cooperative or association, the person may elect to receive a lump sum payment. The payment shall be equal to the capitalized value of 60 monthly installments of the amount that is obtained by subtracting the Total Tenant Payment from the monthly rent and estimated monthly cost of utilities at a comparable replacement dwelling unit. To compute the capitalized value, the installments shall be discounted at the rate of interest paid on passbook savings deposits by a Federally-insured Bank or Savings and Loan institution conducting business in the City.

3. One-for One Replacement Units:

- (i) All occupied and vacant occupiable low/moderate-income units that are demolished or converted in connection with a CDBG- or HOME-funded activity must be replaced with low/moderate-income units.
- (ii) The replacement units may be provided by any government agency or private developer, and must meet the following requirements:
 - (A) The units must be located within the City of Saint Paul, and to the extent feasible, the units shall be located within the same neighborhood as the units being replaced.
 - (B) The units must be sufficient in number and size to house no fewer than the number of occupants who could have been housed in the units being demolished or converted. The number of occupants who could have been housed in units shall be determined by the City occupancy codes. The City may not replace the units with smaller units unless it is consistent with the needs analysis in the Consolidated Plan.
 - (C) The units must be provided in standard condition.
 - (D) The units must be made available for occupancy at any time beginning one (1) year before the City submits its replacement plan to HUD and ending three (3) years after the commencement of demolition or conversion.
 - (E) The units must be designed to remain low/moderate-income units for at least 10 years from the date of initial occupancy.
 - (F) Replacement units may include public housing or existing housing receiving Section 8 project-based assistance.
- (iii) Before the City enters into a contract for the demolition or conversion of low/moderate-income dwelling units, the following information must be made public and submitted to the local HUD Field Office:
 - (A) A description of the proposed activity to be assisted with CDBG funding.

- (B) The location on a map and number of low/moderate-income dwelling units by size (number of bedrooms) that will be demolished or converted as a result of the assisted activity.
 - (C) A time schedule for the commencement and completion of the demolition or conversion.
 - (D) The location on a map and the number of dwelling units by size that will be provided as replacement dwelling units. If this information is not available at the time of the submission, the general location and approximate number of dwelling units by size shall be identified. The specific location and exact number of dwelling units shall be submitted and made public as soon as the information is available.
 - (E) The source of funding and a time schedule for the provision of the replacement low/moderate dwelling units.
 - (F) The basis for concluding that each replacement unit will remain a low/moderate-income dwelling unit for at least ten (10) years from the date of initial occupancy.
 - (G) Information demonstrating that any replacement of units with smaller units is consistent with the City's Consolidated Plan.
- (iv) The one-for-one replacement requirement does not apply to the extent the local HUD Field Office determines that there is an adequate supply of vacant low/moderate-income dwelling units in standard condition available on a nondiscriminatory basis within the City, or an area larger than the jurisdiction of the City. The City must submit a request for this determination to the local HUD Field Office, and also make the request public and inform the public that they have thirty (30) days to provide HUD additional information supporting or opposing the request.

City of Saint Paul
Emergency Transfer Plan for Victims of Domestic Violence,
Dating Violence, Sexual Assault, or Stalking

Scope

This Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking (the “Plan”) applies to properties funded by the City of Saint Paul (the “City”) through the HOME Investment Partnerships program), which the date of funding commitment is on or after December 16, 2016 (“Covered Properties”). This plan implements pertinent provisions of the Violence Against Women Act (VAWA) and related provisions of the HOME regulations at C.F.R. part 92.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request and emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD).

Emergency Transfers

In accordance with the Violence Against Women Act (VAWA),¹ tenants of Covered Properties who are victims of domestic violence, dating violence, sexual assault, or stalking may request an emergency transfer from the tenant’s current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.² Emergency transfers depend on a determination that the tenant is eligible pursuant to this Plan and VAWA. Emergency transfers can be internal or external. Owners of Covered Properties are required to follow this Plan and to adopt a project-specific Emergency Transfer Plan that covers both internal and external transfers.

- **Internal Emergency Transfers.** The owner’s Emergency Transfer Plan will allow eligible tenants to request an emergency transfer from the tenant’s current unit to another unit win

¹ Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

² Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

the property when a safe unit is immediately available. An internal transfer would allow an eligible tenant to reside in a new unit in the same property without having to undergo an application process. The ability of an owner to honor such a request may depend on whether the property has a safe unit that is available to offer the eligible tenant for temporary or more permanent occupancy. If a safe unit is not immediately available, the Emergency Transfer Plan must provide that, at a minimum, the tenant receives any applicable additional priority that housing providers may already provide to other types of emergency transfer requests.

- **External Emergency Transfers.** The owner's Emergency Transfer Plan will also allow an eligible tenant to request an external transfer. A request for an internal and external transfer may be made concurrently if a safe unit is not immediately available. An external transfer is an emergency relocation of a tenant to another unit where the tenant would be categorized as a new applicant; that is the tenant must undergo an application process in order to reside in the new unit. Eligible tenants who wish to make an external transfer when a safe unit is not immediately available will be provided with both a list in the jurisdiction that include HOME-assisted units and information on victim service providers and advocates.

Eligibility for Emergency Transfers

A tenant residing in a unit assisted by HOME in a Covered Property who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 C.F.R. part 5, subpart L is eligible for an emergency transfer if:

1. The tenant expressly requests the transfer; AND
2. One of the following:
 - a. The tenant reasonable believes that there is a threat of imminent harm from further violence if the tenant remains within the same dwelling unit that the tenant is currently occupying; OR
 - b. In the case of a tenant who is a victim of sexual assault, either the tenant reasonably believes there is a threat of imminent harm from further violence if the tenant remains within the same dwelling unit that the tenant is currently occupying, or the sexual assault occurred on the premises during the 90-calendar-day period preceding the date of the request for transfer. Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements described in this Plan.

Emergency Transfer Request Documentation

To request an emergency transfer, the tenant shall notify the property owner or the property owner's agent and submit a written request for a transfer to another unit. The property management will provide reasonable accommodations to this policy for individuals with disabilities. The tenant's written request for an emergency transfer should include either:

1. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under the housing provider's program; OR
2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for an emergency transfer.

Any request by the owner/property manager for additional information must comply with 24 C.F.R. part 5, subpart L. The property management at a Covered Property will make a preliminary determination regarding whether a tenant qualifies for an emergency transfer and will provide both the emergency transfer request documentation and that preliminary determination to the City via e-mail (AHC email??) within 24 hours of the request. City staff will respond to the request to property management within two business days. If the City has not responded to the request within two business days the property management shall treat the tenant's request as approved.

Confidentiality

The City and the owner/property management will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the Covered Program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant. See the Notice of Occupancy Rights under the Violence Against Women Act For All Tenants for more information.

Emergency Transfer Timing and Availability

The City nor the property manager cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. Both the City and the property manager will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. The property manager may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If the property has no safe and available units for which a tenant who needs an emergency is eligible, the housing provider will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant's request, the property manager will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this Plan. The City will provide a list of properties in the jurisdiction that includes HOME-assisted units.

The City's role is limited to reviewing the property manager's determination of whether a tenant qualifies under the Plan. The City does not process or handle transfers or transfer requests beyond that review.

Safety and Security of Tenants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at

<https://ohl.rainn.org/online/>.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>

Attachment: Local organizations offering assistance to victims of domestic violent, dating violence, sexual assault, or stalking.

DRAFT

CITY OF SAINT PAUL**HUD PY 2024-25-25 EMERGENCY SOLUTIONS GRANT PROGRAM – ACTION PLAN****OVERVIEW**

Beginning PY 2020, The City of Saint Paul has a Joint Powers Agreement with Ramsey County to allocate its Emergency Solutions Grant (ESG) funds consistent with recommendations of the Ramsey County Continuum of Care (CoC). For HUD PY 2024-25, Ramsey County will allocate City ESG funds to agencies that provide homeless prevention services, emergency shelter facilities, transitional housing, rapid rehousing services, counseling services, street outreach services, and data collection. The ESG funds will be awarded after the proposals are reviewed by Ramsey County with consultation with Ramsey County Continuum of Care (CoC) Coordinator, Ramsey County CoC Governing Board, and City staff. In general, approximately 15 community agencies that serve Saint Paul residents who are homeless or at-risk of being homeless apply annually for ESG funds for which City Council considers for final approval. For HUD PY 2024-25, ESG funding allocations take into consideration: 1) services to be provided to homeless adults, families, youth, and underserved populations such as new Americans, refugees, and veterans; 2) the supplemental funding needs of CoC programs (fills gaps); 3) risk rating and prior performance of ESG sub-recipients; 4) national HUD housing and homeless objectives; and 5) City housing and homeless objectives and priorities.

During HUD PY 2024-25, the City will continue to partner with Ramsey County to implement the County's Continuum of Care program which provides transitional housing, rapid rehousing, permanent supportive housing, and supportive services to homeless single adults, homeless families, and homeless youth. Furthermore, the City will participate with the Ramsey County CoC Governing Board and Ramsey County FHAP Committee to implement *Heading Home Ramsey* – a comprehensive plan to end homelessness in Ramsey County.¹

At the same time, the City will continue to own the Saint Paul Residence which provides 120 units of support housing, including 60 units for late-stage alcoholic residents.

The Saint Paul Police Department now has a mental health unit in addition to its partnership with RADIAS Health to develop police services responsive to homeless residents with mental illness. Second, the Saint Paul Central Library sponsors a weekly community meeting space in which homeless residents can meet with community agencies. The City is currently restructuring its street outreach program from an enforcement-based approach to a service-based approach to strategically address the needs of those experiencing homelessness. In coordination with Ramsey County and

¹ *Heading Home Ramsey* called for the creation of 670 units of permanent supportive housing in Saint Paul by 2010. By December 2011, the City and its funding partners achieved its goal by financing 738 supportive housing, including new construction or rehabilitation (375 units), securing additional 349 rental assistance/vouchers and operating subsidy for 14 supportive housing units. Nonetheless, the viability of the *City/County Plan to End Long-Term Homelessness* remains dependent upon receiving rental assistance funds from HUD. Without such federal funds, the City has limited ability to support this federal initiative to serve chronically homeless residents.

other service providers, the new approach aligns City and County resources to ensure that every individual can be connected to services. The program includes a new response strategy to receiving calls and managing homeless encampments and increased coordination among service agencies to provide assessments, support, and resources. The City, in partnership with Ramsey County, and partner organizations developed the Familiar Faces pilot project. Intended to more effectively assist individuals with most frequent interaction with emergency services such as police, EMS and fire. The Familiar Faces program integrate mental health and county case management services into the existing outreach programs- offering crisis support and shelter and a wrap-around service planning model.

The City supports the participation of homeless residents on various issues and projects, such as the Ramsey CoC and the Family Homelessness Prevention Assistance Program (FHPAP) Committee. In a recent CoC survey, we found that:

- 20% of those responding identified as a person with the lived experience of homelessness,
- 39% identified as BIPOC,
- 23% identified as a member of the LGBTQIA community, and
- 19% identified as a person with a disability

Finally, it should be noted that the City also allocates CDBG funds to the Block Nurse Program and Neighborhood Non-Profit programs that provide assistance for residents experiencing homelessness and persons with special needs. Moreover, Minnesota Community Care, a FQHC (Federally Qualified Health Center), provides 18 clinical care sites, including a public housing clinic, 9 school-based clinics and two clinics embedded in emergency shelters. These clinics are part of the Health Care for the Homeless program at Minnesota Community Care. They are both embedded in emergency shelters at the new Downtown Clinic and Union Gospel Mission. The clinics offer primary care, behavioral health, complementary care, dental, optometry and supportive services to support patients in moving forward and working towards stable housing. In addition, staff teams go out two mornings per week to meet with unsheltered residents to provide care and build positive rapport for future care opportunities. Catholic Charities coordinates a Medical Respite program that takes referrals from the downtown hospitals of homeless patients discharging from inpatient stays.

HUD PY 2024-25 ESG §576.100 General provisions and expenditure limits.

For HUD PY 2024-25, the City of Saint Paul's ESG funds five program components including street outreach, emergency shelter operations, homelessness prevention, rapid re-housing assistance, HMIS data collection and administrative activities. These five (5) ESG program components and the eligible activities that may be funded under each are set forth in 24 CFR §576.101 through §576.107. Eligible administrative activities are set forth in 24 CFR §576.108.

Under § 576.100(b) the total amount of the recipient's fiscal year grant that may be used for street outreach and emergency shelter activities cannot exceed the greater of:

- (1) 60 percent of the recipient's fiscal year grant totaling \$594,358;
- (2) The amount of Fiscal Year 2010 ESG grant was \$350,982;

- (3) The City will allocate up to 60% of its fiscal year grant to street outreach and emergency shelter activities.

Under § 576.100(c), the total amount of ESG funds for administrative activities will not exceed 7.5 percent of the recipient's fiscal year grant.

HUD PY 2024-25 ESG STREET OUTREACH COMPONENT

Pursuant to C.F.R. §24 576.102, the City's ESG may fund street outreach services if provided to homeless youth or homeless single adults who live outside and have a mental health diagnosis. The maximum allocation for street outreach is approximately \$40,500 for HUD PY20. The *Street Outreach Standards Manual*, approved by the CoC in March 2019, establishes a consistent definition and minimum standards for all current and future Street Outreach (SO) projects within the Heading Home Ramsey Continuum of Care (HHR), Ramsey County's homelessness response continuum.

Sub recipients that request ESG funds for street outreach must comply with C.F.R. §24 576.101, as follows:

- (a) *Eligible costs.* Subject to the expenditure limit in §576.100(b), ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. For the purposes of this section, the term "unsheltered homeless people" means individuals and families who qualify as homeless under paragraph (1)(i) of the "homeless" definition under §576.2. The eligible costs and requirements for essential services consist of:

- (1) *Engagement.* The costs of activities to locate, identify, and build relationships with unsheltered homeless people and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs. These activities consist of making an initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing, and rapid re-housing programs. Eligible costs include the cell phone costs of outreach workers during the performance of these activities.
- (2) *Case management.* The cost of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant. Eligible services and activities are as follows: using the centralized or coordinated assessment system as required under § 576.400(d); conducting the initial evaluation required under § 576.401(a), including verifying and documenting eligibility; counseling; developing, securing and coordinating services; obtaining Federal, State, and local benefits; monitoring and evaluating program participant progress; providing

information and referrals to other providers; and developing an individualized housing and service plan, including planning a path to permanent housing stability. (3) *Transportation.* The transportation costs of travel by outreach workers or other service providers are eligible, provided travel occurs during the provision of eligible services. The costs of transporting unsheltered people to emergency shelters or other service facilities are also eligible.

- (4) *Services for special populations.* ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs (a)(1) through (a)(5) of this section. The term victim services means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.
- (b) *Minimum period of use.* Sub-recipients must provide services to homeless individuals and families for the period during which ESG funds are provided.
- (c) *Maintenance of effort.* The City's ESG funds will not be used to replace funds the local government provided for street outreach and emergency shelter services during the immediately preceding 12-month period, unless HUD determines that the unit of general-purpose local government is in a severe financial deficit.

HUD PY 2024-252024-25 - ESG EMERGENCY SHELTER COMPONENT

Recognizing local needs, the City's ESG places a high priority on paying emergency shelter operational costs for homeless adults, homeless families, and homeless youth. The City ESG also funds transitional housing operational costs for homeless women and homeless families. Therefore, the City does not allocate ESG funds for rehabilitations, conversions or building renovations. Sub-recipients requesting ESG funds for emergency shelter and essential services must comply with C.F.R. §24 576.102, as follows:

- (a) *General.* Subject to the expenditure limit in §576.100(b), ESG funds may pay for essential services to homeless families and individuals residing in emergency shelters as well as operating costs emergency shelters, including transitional housing.
- (b) *Essential services* may include case management, including using the centralized or coordinated assessment system that has been developed by Ramsey County and community agencies to recognize HUD national objectives. Subject to funding availability, this coordinated assessment process includes screening, initial evaluation, diversion, and referrals. As necessary, coordinated assessment includes more intensive evaluations to provide referrals to emergency shelter or other community services. Eligible activities could include:
 - (1) Conducting the initial evaluation required under §576.401(a), including verifying and documenting eligibility;

- (2) Counseling;
- (3) Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;
- (4) Monitoring and evaluating program participant progress;
- (5) Providing information and referrals to other providers;
- (6) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
- (7) Developing an individualized housing and service plan, including planning a path to permanent housing stability.

(c) *Shelter operations.* For HUD PY 2024-25, Saint Paul ESG funds may pay eligible operating costs of emergency shelters or transitional housing, such as building maintenance costs, facility rent, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the emergency shelter operations. Since the ESG-Emergency Shelter Program Component is essential to the Heading Home Ramsey Plan, the City, in consultation with Ramsey County Continuum of Care Governing Board, places a high priority of allocating ESG funds for emergency shelter operations.

As part of the ESG – Emergency Shelter Component, Saint Paul ESG may also pay for the transportation costs of a program participant's travel for medical care, employment, childcare, or other eligible essential services. Transportation costs may include cost of a program participant's travel on public transportation; service worker's transportation costs to visit program participants; or operating costs, such as cost of gas, insurance, taxes, and maintenance for the vehicle as necessary to transport program participants and/or staff serving program participants. Additionally, transportation costs may include costs to transfer shelter beds and equipment to faith-based institutions that participate with Interfaith Action's Project Home which provides overnight shelter beds for homeless families.

Prohibition against involuntary family separation. The age of a child under age 18 must not be used as a basis for denying any family's admission to an emergency shelter that uses Emergency Solutions Grant (ESG) funding or services and provides shelter to families with children under age 18.

(d) *Non-funded costs for Saint Paul ESG.* In response to local needs, the City's ESG funds will not pay for costs incurred for day care, education services, employment assistance, job training, outpatient health services, life skills training, mental health services, mental health services, or substance abuse treatment services.

(e) *Minimum period of use.* Where ESG funds are used solely for essential services or shelter operations, sub-recipients must provide services or shelter to homeless individuals and families for the period during which ESG funds are provided. Sub-recipients do not need to limit these services or shelter to a particular site or structure, so long as the site or structure serves the same

type of persons originally served with the assistance or serves homeless persons in the same area where the sub-recipients originally provided the services or shelter.

HUD PY 2024-25 ESG HOMELESSNESS PREVENTION ASSISTANCE

Pursuant to C.F.R. §24 576.103, the City's ESG funds may pay for homelessness prevention, such as housing relocation and stabilization services, short-term rental assistance, and medium-term rental assistance, utility default payment, and legal services as necessary to prevent individuals or families from moving into emergency shelters or other place as described in paragraph 1 of the "homeless" definition of C.F.R. §24 576.2.

Homelessness prevention assistance may be provided to individuals or families who meet the criteria under the "risk of being homelessness" as defined in C.F.R §24 576.2 or who meets the criteria under paragraph (2), (3) or (4) of the "homeless" definition in C.F.R §24 576.2 and have incomes at or below 30% of AMI as determined by HUD.

In general, Saint Paul ESG funds – Homelessness Prevention Component will be used for rental default payments, utility default payments, first month's rent payment, rental deposits, storage costs, or legal costs provided by Legal Aid as necessary to prevent evictions or building condemnations which could result in homelessness.

The costs of homelessness prevention activities are only eligible to the extent that homelessness prevention assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into permanent housing and achieve stability in that housing. Homelessness prevention must be provided in accordance with the housing and stabilization services requirements in C.F.R §24 576.105, the short-term and medium rental assistance in C.F.R §24 576.106, and the written standards and procedures established under C.F.R §24 576.400.

RISK FACTORS FOR DETERMINING ELIGIBILITY - PREVENTION ASSISTANCE

Sub-recipients will use the guidelines to identify risk factors and determine whether homelessness prevention assistance is the appropriate ESG response to assist at-risk individuals or families from entering emergency shelters and requiring higher use of emergency crisis community resources.

Case managers will target ESG homelessness prevention services to program participants at or below 30% of area median income and who are most likely to become homeless without ESG homelessness prevention assistance. Additionally, case managers will target to households who are in the most of need of temporary assistance and most likely to achieve stable housing. Case managers will use a screening tool to consider risk factors of individuals or families with Level 1 (minimum barriers) and Level 2 (moderate barriers) to maintaining housing. In determining eligibility for homelessness prevention assistance, case managers may also consider other risk factors, such as:

1. Eviction within 2 weeks from a private dwelling (including housing provided by family or friends);
2. Residency in housing that is condemned and is no longer meant for human habitation;
3. Sudden and significant loss of income;

4. Sudden significant increase in utility costs,
5. Mental health and substance abuse issues;
6. Physical disabilities and other chronic health issues, including HIV/AIDS;
7. Severe housing cost burden (greater than 50 percent of income for housing costs);
8. Homeless in last 12 months;
9. Young head of household (under 25 with children or pregnant);
10. Current or past involvement with child welfare, including foster care;
11. Pending foreclosure of rental housing;
12. High overcrowding (the number of persons exceeds health and/or safety standards for the housing unit size);
13. Past institutional care (prison, treatment facility, hospital);
14. Recent traumatic life event, such as death of a spouse or primary care provider;
15. Recent health crisis that prevented the household from meeting its financial responsibilities;
16. Credit problems that preclude maintaining stable housing; or
17. Significant amount of medical debt.

ELIGIBLE POPULATION (C.F.R. §24 576.2) – HOMELESSNESS PREVENTION

At risk of homelessness means.

(a) An individual or family who:

- (1) Has an annual income below 30 percent of median family income for the area median income (AMI) area as determined by HUD;
- (2) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “homeless” definition in this section; and
- (3) Meets one of the following conditions:
 - (A) Has moved because of economic reasons two or more times during the sixty (60) days immediately preceding the application for homelessness prevention;
 - (B) Is living in the home of another because of economic hardship;
 - (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;

- (D) Lives in a hotel or motel and the cost of the hotel and motel stay is not paid or living situation will be terminated within 21 days after the date of application for assistance;
 - (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons per room, as defined by U.S. Census Bureau;
 - (F) Is existing a publicly funded institution, or system of care (such as a healthcare facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
 - (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan.
- (2) A child or youth who does not qualify as "homeless" under this definition, but qualifies under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637(11) of the Head Start Act (42, U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), Section 330(h)(5)(A) of the Public Health Services Act (42 U.S.C. 254(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7, U.S.C 2012(m)), section 17(b)(15) of the Child Nutrition Act of 1966 (42. U.S.C. 1786(b)(15))
 - (3) A child or youth who does not qualify as "homeless" under this definition but qualifies under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a (2)), and the parent(s) or guardian(s) of the child or youth if living with him or her. OR
 - (4) An individual or family who will imminently lose their primary nighttime residence, provided that:
 - (i) The primary nighttime residence will be lost within 14 days of the date of the application for homeless assistance;
 - (ii) No subsequent residence has been identified; and
 - (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing;
 - (5) Any individual or family who:
 - (i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence against the individual or family member, including a child is fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;

- (ii) Has no other residence; and
- (iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

Eligible Activities

- (a) The City's ESG funds may pay for homelessness prevention assistance, such as short-term rental assistance (one month's rent), rental application fees, rental arrears costs (one month's rent, and related fees), unlawful detainer court fees, rental payment late fees, security deposits, utility deposits, utility payment assistance, reasonable moving costs, storage costs, case management costs, and related costs of sub-recipients to provide such services (if not paid under other subsections).
- (b) Sub-recipients must not make payments directly to program participants, but only to third parties, such as landlords or utility companies.

HUD PY 2024-25 - ESG RAPID RE-HOUSING ASSISTANCE COMPONENT

ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible from an emergency shelter into permanent housing and achieve stability in that housing. This rapid re-housing assistance may be provided to program participants who meet the criteria under paragraph (1) of the "homeless" definition in §576.2 or who meet the criteria under paragraph (4) of the "homeless" definition and live in an emergency shelter or other place described in paragraph (1) of the "homeless" definition.

The rapid re-housing assistance must be provided in accordance with the housing relocation and stabilization services requirements in §576.105, the short- and medium-term rental assistance requirements in §576.106, and the written standards and procedures established under §576.400.

ELIGIBLE PROGRAM PARTICIPANTS – RAPID RE-HOUSING

For HUD PY 2024-25, ESG rapid re-housing assistance may assist extremely low-income adults, families, and youth/young adults who meet the criteria of "homeless" as defined in CFR 24, §576.2, as follows:

- (a) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - (1) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport or camping ground;
 - (2) An individual or family living in a supervised publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or

- (3) An individual who is exiting an institution where he or she resided for ninety (90) days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
- (b) An individual or family who will imminently lose their primary nighttime residence, provided that
- (1) The primary nighttime residence will be lost within 14 days of the date of the application for homeless assistance; and
 - (2) No subsequent residences have been identified; and
 - (3) The individual or family lacks the resources or support networks (i.e., family, friends, faith-based or social networks, needed to obtain other permanent housing
- (c) Unaccompanied youth under 25 years of age, or families with children and youth who do not otherwise qualify as homeless but who:
- (1) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42, U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), Section 330 (h) of the Public Health Services Act (42 U.S.C. 254(h)), section 3 of the Food and Nutrition Act of 2008 (7, U.S.C 2012), section 17(b) of the Child Nutrition Act of 1966 (42. U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
 - (2) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
 - (3) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
 - (4) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or
- (d) Any individual or family who:
- (1) Is fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
 - (2) Has no other residence; and

- (3) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

WRITTEN STANDARDS AND PROCEEDURES FOR RAPID RE-HOUSING PROGRAM

See applicable provisions under §576.400.

ELIGIBLE ACTIVITIES FOR ESG RAPID RE-HOUSING PROGRAM

Pursuant to 24 CFR §576.104 - §576.106, ESG Rapid Re-Housing Initiative has four categories of eligible activities: financial assistance, housing relocation and stabilization services, data collection and evaluation, and administrative costs. These eligible activities are intentionally focused on housing - either financial assistance for housing costs or housing stabilization and relocation services that assist homeless residents secure housing. ESG's goal is to rapidly assist program participants gain housing stability, either by their means or by public assistance, as appropriate. ESG does not provide long-term support for program participants, nor will ESG address all financial and supportive services needs of households that affect housing stability. Rather, ESG focuses on assisting homeless residents move from emergency shelters, securing housing, linking program participants to community resources and mainstream benefits, and helping them develop a plan for preventing future housing instability.

ESG case managers may meet with program participants at least monthly for the duration of the assistance. Case managers will develop individual plans to assist program participants to overcome barriers to secure permanent housing and provide assistance to stabilize occupancy after ESG assistance ends. Case manager will monitor and reevaluate program participants, as necessary.

ESG funds may be used to provide housing relocation and stabilization services, short term rental assistance and/or medium rental assistance as necessary to assists homeless individuals or homeless families move as quickly as possible out of emergency shelters into permanent housing.

Rapid re-housing assistance must be provided in accordance with the housing relocation and stabilization service requirements in 24 CFR § 576.105, the short-term rental assistance and medium rental assistance in 24 CFR § 576.106; and the written standards and procedures in 24 CFR § 576.400.

The *Rapid Re-Housing Standards Manual* establishes a consistent definition and minimum standards for all current and future Rapid Re-housing Supportive Housing (RRH) projects within the Heading Home Ramsey Continuum of Care (HHR) and includes policies that addresses the rental assistance contribution to a client's rent and utility payment.

Ineligible and Prohibited Activities

- (a) Financial assistance may not pay for any mortgage costs or costs needed by homeowners to assist with any fees, taxes, or other costs of refinancing a mortgage to make it affordable.
- (b) ESG funds may not pay any of the following items: construction or rehabilitation; credit card bills or other consumer debt; car repair or transportation costs (not related to going to community referrals); travel costs; food; medical or dental care and medicines; clothing and grooming; home furnishings; pet care; entertainment activities; work or education related materials; and cash

assistance to program participants. ESG may not be used to develop discharge planning programs in mainstream institutions such as hospitals, jails, or prisons. Finally, while training for case managers and program administrators is an eligible administrative cost if it is directly related to ESG Rapid Re-Housing program operations, ESG may not be used to pay for certifications, licenses, and general training classes.

- (c) Programs may not charge fees to program participants.
- (d) Any ESG funds used to support program participants must be issued directly to the appropriate third party, such as the landlord or utility company, and in no case are funds eligible to be issued directly to program participants.

§576.105 HOUSING RELOCATION AND STABILIZATION SERVICES

Pursuant to C.F.R. §24 576.103 and C.F.R. §24 576.104, ESG funds may be used for Housing Relocation and Stabilization Services. Sub-recipient will provide housing relocation and stabilization activities under 24.CFR §576.105. ESG funds may pay services that assist program participants with housing stability and placement, such as:

- (a) Financial Assistance costs: Subject to the general conditions under 24 C.F.R. §576.104, ESG funds may pay housing owners, utility companies, and other third parties for the following costs.
 - (1) *Rental Application fees*: ESG funds may pay for the rental housing application fee that is charged by the owner to applicants.
 - (2) *Security Deposits*: ESG funds may pay for a security deposit that is equal to no more than two (2) months' rent or an amount that sub-recipient has determined reasonable given the existing tight rental market.
 - (3) *Last month's rent*: If necessary to obtain housing for a program participant, the last month's rent may be paid from ESG-2 funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one months' rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any 3-year period.
 - (4) *Utility deposits*. ESG funds may pay for a standard utility deposit required by the utility company for all customers for the utilities listed in paragraph (5) of this section.
 - (5) *Utility payments*. ESG funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water, and sewage. No program participant shall receive more than 24 months of utility assistance within any 3-year period.
 - (6) *Moving costs*. ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3

months, provided that the fees are accrued after the date the program participant begins receiving assistance under paragraph (b) of this section and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.

- (7) Hotel or motel rental costs: ESG funds may pay short-term hotel or motel costs when necessary to assist homeless families prior to securing stable housing.

(b) Services costs. Subject to the general restrictions under §576.103 and §576.104, ESG funds may be used to pay the costs of providing the following services:

- (1) *Housing search and placement.* Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing, include the following:

- (i) Assessment of housing barriers, needs, and preferences;
- (ii) Development of an action plan for locating housing;
- (iii) Housing search;
- (iv) Outreach to and negotiation with owners;
- (v) Assistance with submitting rental applications and understanding leases;
- (vi) Assessment of housing for compliance with Emergency Solutions Grant (ESG) requirements for habitability, lead-based paint, and rent reasonableness;
- (vii) Assistance with obtaining utilities and making moving arrangements; and
- (viii) Tenant counseling.

- (2) *Housing stability case management.* ESG funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. Component services and activities consist of:

- (i) Using the centralized or coordinated assessment system as required under §576.400(d), to evaluate individuals and families applying for or receiving homelessness prevention or rapid re-housing assistance;
- (ii) Conducting the initial evaluation required under §576.401(a), including verifying and documenting eligibility, for individuals and families applying for homelessness prevention or rapid re-housing assistance;
- (iii) Counseling;
- (iv) Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;

- (v) Monitoring and evaluating program participant progress;
 - (vi) Providing information and referrals to other providers;
 - (vii) Developing an individualized housing and service plan, including planning a path to permanent housing stability; and
 - (viii) Conducting re-evaluations required under §576.401(b).
- (3) *Mediation.* ESG funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.
- (4) *Legal services.* ESG funds may pay for legal services, as set forth in §576.102(a)(1)(vi), except that the eligible subject matters also include landlord/tenant matters. Legal services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.
- (5) *Credit repair.* ESG funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.
- (i) *Maximum amounts and periods of assistance.* The recipient may set a maximum dollar amount that a program participant may receive for each type of financial assistance under paragraph (a) of this section. The recipient may also set a maximum period for which a program participant may receive any of the types of assistance or services under this section. However, except for housing stability case management, the total period for which any program participant may receive the services under paragraph (b) of this section must not exceed 24 months during any 3-year period. The limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family.
 - (ii) *Use with other subsidies.* Financial assistance under paragraph (a) of this section cannot be provided to a program participant who is receiving the same type of assistance through other public sources or to a program participant who has been provided with replacement housing payments under the URA, during the period of time covered by the URA payments.

§576.106 SHORT- AND MEDIUM-TERM RENTAL ASSISTANCE

Pursuant to C.F.R. §24 576.103 and C.F.R. §24 576.104, ESG funds may be used for short-term rental assistance and medium-term rental assistance. Sub-recipient will provide short-term rental assistance and medium-term rental assistance as follows:

Subject to the general conditions under §576.103 and §576.104, the recipient or sub-recipient may provide a program participant with up to 24 months of rental assistance during any 3-year period. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.

(a) *General provisions.* Subject to the general conditions under §576.103 and §576.104, the sub-recipient may provide a program participant with up to 24 months of rental assistance during any 3-year period. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.

- (1) Short-term rental assistance is assistance for up to 3 months of rent.
- (2) Medium-term rental assistance is assistance for more than 3 months but not more than 12 months of rent.
- (3) Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.
- (4) Rental assistance may be tenant-based or project-based, as set forth in paragraphs (h) and (i) of this section.

(b) *Discretion to set caps and conditions.* Subject to the requirements of this section, the recipient may set a maximum amount or percentage of rental assistance that a program participant may receive, a maximum number of months that a program participant may receive rental assistance, or a maximum number of times that a program participant may receive rental assistance. The recipient may also require program participants to share in the costs of rent. For this section, the City is requiring the following conditions:

Homelessness Prevention Program and Rapid Re-housing Program

- (1) ESG Homelessness Prevention and Rapid Re-Housing assistance should be “needs-based,” meaning that case manager should determine the amount of assistance based on the minimum amount needed to assist homeless resident secure or maintain housing.
- (2) Rental assistance payments cannot be made on behalf of eligible individuals or families for the same period of time and for the same cost types that are being provided through another federal, state or local housing subsidy program.
- (3) Compliance with minimum habitability standards.

Homelessness Prevention Program:

- (1) For the purpose of this section, “short-term” assistance is defined as one month’s rent and security deposit.
- (2) For the purpose of this section, ESG funds will not pay medium-term rental assistance as a homelessness prevention strategy.

Rapid Re-Housing (RRH)

ESG funds may be used to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. This assistance may be provided to program participants who meet the criteria under paragraph (1) of the “homeless” definition in Subsection 576.2 or who meet the criteria under paragraph (4) of the “homeless” definition (where the individual or family also meets the criteria for paragraph 1).

Conditions for using RRH

Rapid Rehousing services may be provided to those “Homeless” meeting one the following conditions:

Homeless Definition (1) Literally Homeless - An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- (i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.
- (ii) An individual or family living in a supervised publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
- (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Homeless Definition (4) Fleeing/Attempting to Flee Domestic Violence - Any individual or family who:

- (i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; (where the individual or family also meets the criteria for paragraph 1).
- (ii) Has no other residence; and
- (iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

Eligible Activities for both HP and RRH

Rental Assistance Services

Homeless Prevention and Rapid-Re-Housing includes rental assistance and housing relocation and stabilization services. (Subject to the general conditions under Subsection §576.103 and §576.104).

Program participants may be provided up to 24 months of rental assistance during any three-year period. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.

The maximum amount of rental assistance provided and, an individual or family's level of responsibility for rent payments, over time, shall be determined by the county subrecipient and shall be reflective of the individual or family's need for rental assistance and the level of financial resources available to the county subrecipient.

Eligible Activities:

1. **Short-Term Rental Assistance:** Assistance for up to (3) months of rent. Designation of Short-term Rental Assistance must take into consideration payment of Rental Assistance Arrears.
2. **Medium-Term Rental Assistance:** Assistance for more than 3 months but not more than 24 months of rent.
3. **Rental Assistance Arrears:** A one-time payment for up to 6 months of arrears and may include any late fees on those arrears but counts toward 24-month service period. An arrears payment is only an eligible cost if a tenant would actually be evicted for non-payment of their portion of the rent or utilities (Homelessness Prevention) or the arrears are preventing the household from obtaining permanent housing and achieving stability in that housing (Rapid Re-Housing).
 - Months 1-3 are defined as Short-Term Arrears (or Short-Term Rental Assistance).
 - Months 4-6 are defined as Medium Term Arrears (or Medium-Term Rental Assistance).
4. Rental Assistance may be tenant-based or project-based.

Tenant-based rental assistance

A participant who receives tenant-based rental assistance may select a housing unit in which to live and may move to another unit or building and continue to receive rental assistance, if the participant continues to meet the program requirements.

The county subrecipient may require that all program participants live within a particular area for the period in which the rental assistance is provided.

The rental assistance agreement with the owner must terminate and no further rental assistance payments shall be made if:

- The program participant moves out of the housing unit for which the participant has a lease.
- The lease terminates and is not renewed; or
- The participant becomes ineligible to receive ESG rental assistance.

Project-based rental assistance

If the county subrecipient identifies a permanent housing unit that meets ESG requirements and becomes available before a participant is identified to lease the unit, the county subrecipient may enter into a rental assistance agreement with the owner to reserve the unit and subsidize its rent in accordance with the following requirements:

1. The rental assistance agreement may cover one or more permanent housing units in the same building. Each unit covered by the rental assistance agreement (“assisted unit”) may only be occupied by program participants, except as provided by item 4.
2. The county subrecipient may pay up to 100 percent of the first month’s rent, provided that a participant signs a lease and moves into the unit before the end of the month for which the first month’s rent is paid. The rent paid before a program participant move into the unit must not exceed the rent to be charged under the program participant’s lease and must be included when determining that program participant’s rental assistance.
3. The county subrecipient may make monthly rental assistance payments only for each whole or partial month an assisted unit is leased to a program participant. When a participant moves out of an assisted unit, the county subrecipient may pay the next month’s rent, i.e., the first month’s rent for a new program participant as provided in 2).
4. The participant’s lease must not condition the term of occupancy to the provision of rental assistance payments. If the program participant is determined ineligible or reaches the maximum number of months over which rental assistance can be provided, the county subrecipient must suspend or terminate the rental assistance payments for the unit. If the payments are suspended, the individual or family may remain in the assisted unit as permitted under the lease, and the county subrecipient may resume payments if the individual or family again becomes eligible and needs further assistance. If the payments are terminated, the rental assistance may be transferred to another available unit in the same building, provided that the other unit meets all ESG requirements.
5. The rental assistance agreement must have an initial term of one year. When a new program participant moves into an assisted unit, the term of the rental assistance agreement may be extended to cover the initial term of the program participant’s lease. If the program participant’s lease is renewed, the rental assistance agreement may be renewed or extended, as needed, up to the maximum number or months for which the program participant remains eligible. However, under no circumstances may the county subrecipient commit ESG funds to be expended beyond the expenditure deadline (§ 576.203) or commit funds for a future ESG grant before the grant is awarded.

Special Considerations:

Discretion to set caps and conditions: The county subrecipient may set a maximum amount or percentage of rental assistance that a participant may receive rental assistance, a maximum number of months that a participant may receive rental assistance, or a maximum number of times that a participant may receive rental assistance. The county subrecipient may require program participants to share in the costs of rent. If so, it must be documented in the county subrecipient’s written policy and procedures manual.

Use with other subsidies: Except for a one-time payment of rental arrears on the tenant’s portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance or living in a housing unit receiving project-based assistance or operating assistance, through other public sources. Rental assistance may not be provided to a

participant who has been provided with replacement housing payments under URA during the period of time covered by the URA payments.

Mobile Home Lot Rent

Paying for rent of a lot on which a mobile home (also known as a manufactured home) is located or for arrears of this rent is eligible as rental assistance under the ESG Homelessness Prevention component. All other program requirements pertaining to rental assistance still apply, including habitability standards, rent reasonableness, and Fair Market Rent (FMR). Some communities have FMRs for manufactured home spaces. If there are no FMRs for manufactured home spaces in the provider's area, the FMR requirement does not apply in this limited situation.

Please note, however, that ESG may only be used if the client is determined to be eligible for ESG.

Housing Relocation and Stabilization Services

Homeless Prevention and Rapid-Re-Housing includes rental assistance and housing relocation and stabilization services. (Subject to the general conditions under Subsection §576.103 and §576.104).

Eligible Activities:

1. **Rental Application Fees:** for the rental housing application fee that is charged by the owner to all applicants.
2. **Security Deposits:** that is equal to no more than 2 months' rent.
3. **Last month's rent:** if necessary, to obtain housing to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one month's rent and must be included in calculating the program participant's total rent assistance, which cannot exceed 24 months during any 3-year period.
4. **Utility Deposits:** for a standard utility deposit required by the utility company for all customers for utilities listed in the utility payment section.
5. **Utility Payments:** may pay for up to 24 months (during any 3-year period) of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Eligible utility includes the following services: gas, electric, water and sewage.

A household seeking utility only assistance may be eligible for ESG assistance if it can be documented that they will lose their housing and become literally homeless if utility assistance is not provided and the household meets other ESG eligibility requirements. In such cases, county subrecipient must confirm and document in the case file that the utility company will in fact disconnect the utility service if the full amount or a partial payment is not paid, that the disconnection of utility service will cause housing to be unsafe or otherwise cause eviction (i.e., if the applicant is required to maintain utilities per their lease),

and that no other utility assistance (i.e. Energy Share or ESG) is available to prevent the shut-off.

A copy of a utility shut-off notice or arrears statement is not sufficient by itself to document program eligibility. The household still has to meet all other eligibility requirements.

6. **Moving Costs:** such as truck rental or hiring a moving company. This may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance and before the program participant move into permanent housing. Payment of temporary storage fees in arrears is not eligible.
7. **Services Costs:** ESG funds may be used to pay the costs of providing the following services:
 - Assessment of housing barriers needs and preferences.
 - Development of an action plan for locating housing
 - Housing search
 - Outreach and negotiation with owners
 - Assistance with submitting rental applications and understanding leases.
 - Assessment of housing for compliance with Emergency Solutions Grant (ESG) requirements for compliance with habitability and lead-based paint.
 - Assistance with obtaining utilities and making moving arrangement.
 - Tenant counseling
8. **Housing search and placement:** necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing, include the following:
 - Assessment of housing barriers, needs, and preferences.
 - Development of an action plan for locating housing
 - Housing search
 - Outreach to and negotiation with owners
 - Assistance with submitting rental applications and understanding leases.
 - Assessment of housing for compliance with requirements for habitability and lead-based paint.
 - Assistance with obtaining utilities and making moving arrangement.
 - Tenant counseling
9. **Housing Stability case management:** to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing.

Component Services and activities:

- Conducting the initial evaluation (required under subsection 576.401(a), including verifying and documenting eligibility, for individuals and families applying for homeless prevention or rapid re-housing assistance.
- Counseling.

- Developing, securing, and coordinating services and obtaining Federal, State, and local benefits.
- Monitoring and evaluating program participant progress.
- Providing information and referrals to other providers.
- Developing an individualized housing and service plan, including planning a path to permanent housing and stability.
- Conducting re-evaluations required under subsection 576.401(b).
- Mediation between the program participant and the owner or person(s) with whom the participant is living, providing that the mediation is necessary to prevent the participant from losing permanent housing in which they currently reside.
- Legal services as set forth in subsection 576.102 (a) (1) vi), except that the eligible subject matters also include landlord/tenant matters, and the services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.
- Credit repair for credit counseling and other services necessary to assist participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This does not include payment or modification of a debt.
- May be required to use a centralized or coordinated assessment system as required under Subsection 576.400 (d), to evaluate individuals and families applying for or receiving homeless prevention or rapid re-housing assistance.

Special Considerations

Maximum amounts and periods of assistance: The county subrecipient may set a maximum dollar amount that a program participant may receive for each type of financial assistance. The subrecipient may also set a maximum period for which a program participant may receive any of the types of assistance or services. However, except for the housing stability case management, the total period for which any program participant may receive the services must not exceed 24 months during any 3-year period. The limits on the assistance apply to the total assistance an individual receives, either as an individual or as part of a family.

- (a) Use with other subsidies: Financial assistance cannot be provided to a participant who is receiving the same type of assistance through other public sources or who has been provided with replacement housing payments under the URA during the period covered by the URA payments.

HMIS COMPONENT (C.F.R. 24 §576.107)

HMIS Data Collection: Pursuant to 24 CFR §576.107, sub-recipients will administer HMIS as required to implement ESG. For 2017, the City will work with Ramsey County CoC and ESG sub-recipients to comply with future HUD guidance relating to HMIS operations. The sub-

recipient may use ESG funds to pay the costs of contributing data to HMIS. HMIS costs will be limited to three (3) percent of the grant.

Eligible HMIS Costs: ESG funds may pay for costs of contributing data to the HMIS as designated by Ramsey County Continuum of Care, including the costs of purchasing or leasing computer hardware; purchasing software or software licenses; purchasing or leasing equipment, including telephones, fax machines; obtaining technical support; leasing office space; paying charges for utilities and high-speed data transmission necessary to operate or contribute data to HMIS; paying costs of staff to attend HUD-sponsored and HUD-approved training on HMIS; paying staff travel costs to conduct intake; and paying HMIS participation fees.

ADMINISTRATIVE ACTIVITIES (C.F.R. 24 §576.108)

(a) *Eligible costs.* The City of Saint Paul may use up to 7.5 percent of its ESG grant for the payment of administrative costs related to the planning and execution of ESG activities. This does not include staff and overhead costs directly related to carrying out activities eligible under §576.101 through §576.107, because those costs are eligible as part of those activities. Eligible administrative costs include:

- (1) *General management, oversight, and coordination.* Costs of overall program management, coordination, monitoring, and evaluation include, but are not limited to, necessary expenditures for the following:
 - (A) Salaries, wages, and related costs of the recipient's staff, the staff of sub-recipients, or other staff engaged in program administration. In charging costs to this category, the recipient may either include the entire salary, wages, and related costs allocable to the program of each person whose *primary* responsibilities regarding the program involve program administration assignments, or the pro rata share of the salary, wages, and related costs of each person whose job includes *any* program administration assignments. The recipient may use only one of these methods for each fiscal year grant. Program administration assignments include the following:
 - (i) Preparing program budgets and schedules, and amendments to those budgets and schedules;
 - (ii) Developing systems for assuring compliance with program requirements;
 - (iii) Developing interagency agreements and agreements with sub-recipients and contractors to carry out program activities;
 - (iv) Monitoring program activities for progress and compliance with program requirements;

- (v) Preparing reports and other documents directly related to the program for submission to HUD;
 - (vi) Coordinating the resolution of audit and monitoring findings;
 - (vii) Evaluating program results against stated objectives; and
 - (viii) Managing or supervising persons whose primary responsibilities regarding the program include such assignments as those described in paragraph (a)(1)(i)(A) through (G) of this section.
- (B) Travel costs incurred for monitoring of sub-recipients;
 - (C) Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services; and
 - (D) Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space.
- (2) *Training on ESG requirements.* Costs of providing training on ESG requirements and attending HUD-sponsored ESG trainings.
 - (3) *Consolidated plan.* Costs of preparing and amending the ESG and homelessness-related sections of the consolidated plan in accordance with ESG requirements and 24 CFR part 91.
 - (4) *Environmental review.* Costs of carrying out the environmental review responsibilities under §576.407.
- (b) *Sharing requirement. (2) Territories, metropolitan cities, and urban counties.* If the recipient is a territory, metropolitan city, or urban county, the recipient may share its funds for administrative costs with its sub recipients.

§576.109 INDIRECT COSTS

- (a) *In general.* ESG grant funds may be used to pay indirect costs in accordance with OMB Circular A-87 (2 CFR part 225), or A-122 (2 CFR part 230), as applicable.
- (b) *Allocation.* Indirect costs may be allocated to each eligible activity under §576.101 through §576.108, so long as that allocation is consistent with an indirect cost rate proposal developed in accordance with OMB Circular A-87 (2 CFR part 225), or A-122 (2 CFR part 230), as applicable.

- (c) *Expenditure limits.* The indirect costs charged to an activity subject to an expenditure limit under §576.100 must be added to the direct costs charged for that activity when determining the total costs subject to the expenditure limit.

SUBPART E - PROGRAM REQUIREMENTS

§576.400 AREA-WIDE SYSTEMS COORDINATION REQUIREMENTS

- (a) *Consultation with Continuums of Care.* The City of Saint Paul and Ramsey County have entered into a Joint Powers Agreement to administer the ESG program in partnership with Ramsey County Continuum of Care. City staff and Ramsey County consults with Ramsey County Continuum of Care that serves the City of Saint Paul in determining how to allocate ESG funds each program year; develop performance standards for and evaluate the outcomes of projects and activities assisted by ESG funds; and develop funding, policies, and procedures for the administration and operation of the HMIS.
- (b) *Coordination with other targeted homeless services.* The City of Saint Paul and its sub-recipients coordinate and integrate, to the maximum extent practicable, ESG-funded activities with other programs targeted to homeless people in the area covered by the Continuum of Care or area over which the services are coordinated to provide a strategic, community-wide system to prevent and end homelessness for that area. In addition to funding affordable housing opportunities in Saint Paul, the City recognizes these below-mentioned federal programs and may allocate funds to some of the programs:
- (1) Shelter Plus Care Program (24 CFR part 582); such as the Shelter Plus Care Program at Saint Paul Residence, owned by the City and operated by Catholic Charities;
 - (2) Supportive Housing Program (24 CFR part 583);
 - (3) Section 8 Moderate Rehabilitation Program for Single Room Occupancy Program for Homeless Individuals (24 CFR part 882);
 - (4) HUD - Veterans Affairs Supportive Housing (HUD-VASH) (division K, title II, Consolidated Appropriations Act, 2008, Pub. L. 110-161 (2007), 73 FR 25026 (May 6, 2008). The City consults with Saint Paul Public Housing Agency regarding the use of VASH vouchers for homeless veterans in Saint Paul;
 - (5) Education for Homeless Children and Youth Grants for State and Local Activities (title VII-B of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 *et seq.*). In this regard, the City has a working relationship with the Homeless Liaison for the Saint Paul School District;

- (6) Healthcare for the Homeless (42 CFR part 51c) – The City allocates ESG funds to the Healthcare for the Homeless Program in the City of Saint Paul;
 - (8) Programs for Runaway and Homeless Youth (Runaway and Homeless Youth Act (42 U.S.C. 5701 *et seq.*); The City allocates ESG fund to Ain Dah Yung, Lutheran Social Services, and SafeZone – to assist runaway and homeless youth; and
 - (9) Supportive Services for Veteran Families Program (38 CFR part 62) – Minnesota Assistance Council for Veterans is a grant recipient for this program which can serve Saint Paul veterans.
- (c) *System and program coordination with mainstream resources.* The City of Saint Paul and its sub-recipients coordinate and integrate, to the maximum extent practicable, ESG-funded activities with mainstream housing, health, social services, employment, education, and youth programs for which families and individuals at risk of homelessness and homeless individuals and families may be eligible. Examples of these programs include:
- (1) Public housing programs assisted under section 9 of the U.S. Housing Act of 1937 (42 U.S.C. 1437g) (24 CFR parts 905, 968, and 990);
 - (2) Housing programs receiving tenant-based or project-based assistance under section 8 of U.S. Housing Act of 1937 (42 U.S.C. 1437f) (respectively 24 CFR parts 982 and 983);
 - (3) Supportive Housing for Persons with Disabilities (Section 811);
 - (4) HOME Investment Partnerships Program (24 CFR part 92);
 - (5) Temporary Assistance for Needy Families (45 CFR parts 260–265);
- (d) *Centralized or coordinated assessment.* The Continuum of Care has developed a centralized assessment system or a coordinated assessment system homeless families, homeless individuals, and homeless youth seeking emergency shelter. Therefore, each ESG-funded program, as appropriate, must use that assessment system. The City and sub-recipients must continue to work with the Continuum of Care to ensure the screening, assessment and referral of program participants are consistent with the written standards required by HUD. The *Coordinated Entry for Everyone Policy Manual*, approved by the CoC in November 2019, lists the prioritization for people going through Coordinated Entry and seeking transitional housing, rapid rehousing, or permanent supportive services. It also includes the prioritization of people at risk of homelessness.

§576.400(vii) STANDARDS FOR DETERMINING PERCENTAGE OR AMOUNT OF RENT AND UTILITIES COSTS FOR EACH PROGRAM PARTICIPANT MUST PAY WHILE RECEIVING HOMELSSNESS PREVENTION OR RAPID RE-HOUSING ASSISTANCE

All program participants will pay 30% of their income toward rent. If household income increases after three months, then ESG payment will decrease. The Rapid Re-Housing Standards Manual establishes a consistent definition and minimum standards for all current and future Rapid Re-housing Supportive Housing (RRH) projects within the Heading Home Ramsey Continuum of Care (HHR) and includes policies that addresses the rental assistance contribution to a client's rent and utility payment. Utilities are taken into consideration for housing costs/assistance in the RRH process. Clients may also be referred to utility assistance programs available in the community.

If a household income decreases, ESG may pay the rental differential for a period of time agreed upon by case manager and program participant. That said, case manager and program participant must develop a realistic action plan to address the loss of income. Sub-recipient must also consult with the City if additional ESG assistance is needed to achieve the agreed-upon action plan.

Guide for Monitoring of ESG Street Outreach Requirements			
Name of Recipient:			
Name of Subrecipient(s):			
Staff Consulted:			
Name(s) of Reviewer(s)		Date	

NOTE: All questions that address requirements contain the citation for the source of the requirement (statute, regulation, or grant agreement). If the requirement is not met, Ramsey County must select "NO" in response to the question and make a finding of noncompliance. All other questions that do not contain the citation for the requirement do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a **"finding."**

Instructions: This document is designed to assess the recipient's compliance with the Street Outreach component of the Emergency Solutions Grant (ESG) program. The eligible activity areas of review include the costs charged to this component as essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.

It is the responsibility of the Ramsey County reviewer to ensure that the responses provide sufficient documentation to support the basis for the conclusions. Keep in mind that, if multiple entities are reviewed and a deficiency is identified for a single entity, a "No" response is required.

Questions:

1.

Were persons assisted with street outreach essential services determined and documented to be eligible for assistance? [24 CFR 576.401(a); 24 CFR 576.500(b)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

2.

Street Outreach: Were street outreach costs limited to the costs of: providing essential services necessary to reach out to unsheltered homeless people; connecting unsheltered homeless people with emergency shelter, housing, or critical services; and providing urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility? [24 CFR 576.101(a)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

3.

<u>Engagement</u> : Were ESG funds used for Street Outreach engagement limited to the costs listed under 24 CFR 576.101(a)(1)? [24 CFR 576.101(a)(1)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

4.

<u>Case Management</u> : Were ESG funds used only for the costs of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant, for services and activities listed under 24 CFR 576.101(a)(2)? [24 CFR 576.101(a)(2)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

5.

<u>Emergency Health Services</u> : Were ESG funds used for emergency health services limited to the costs of direct outpatient treatment of medical conditions (as listed under 24 CFR 576.101(a)(3)) that is provided: <ul style="list-style-type: none"> a. by licensed medical professionals operating in community-based settings, including streets, parks, and other places where unsheltered homeless people are living, and b. only to the extent that other appropriate health services are inaccessible or unavailable within the area? [24 CFR 576.101(a)(3)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

6.

<u>Emergency Mental Health Services</u> : Were ESG funds used for emergency mental health services limited to the costs associated with direct outpatient treatment (as listed under 24 CFR 576.101(a)(4)) that is provided: <ul style="list-style-type: none"> a. by licensed professionals of mental health conditions operating in community-based settings including streets, parks, and other places where unsheltered people are living, and b. only to the extent that other appropriate health services are inaccessible or unavailable within the area? [24 CFR 576.101(a)(4)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

7.

<p>Transportation: Were ESG funds used for transportation limited to the following eligible costs:</p> <ul style="list-style-type: none"> a. the transportation costs of travel by outreach workers, social workers, medical professionals, or other service providers, and that the travel took place during the provision of services eligible under this section; and b. the costs of transporting unsheltered people to emergency shelters or other service facilities, as listed under 24 CFR 576.101(a)(5)? <p>[24 CFR 576.101(a)(5)]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around;"> Yes No N/A </div>
<p>Describe Basis for Conclusion:</p>	

8.

<p>Minimum Period of Use: Did the recipient ensure that outreach services were provided to unsheltered homeless individuals and families for at least the period during which ESG funds were provided (e.g., the length of the subrecipient agreement)?</p> <p>[24 CFR 576.101(b)]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around;"> Yes No N/A </div>
<p>Describe Basis for Conclusion:</p>	

9.

<p>Maintenance of Effort: If the recipient or subrecipient is a unit of general purpose local government, and its ESG funds were used to replace local government funding of street outreach services, did HUD determine that the unit of general purpose local government was in a severe financial deficit according to the guidelines at 24 CFR 576.101(c)(2)?</p> <p>[24 CFR 576.101(c)]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around;"> Yes No N/A </div>
<p>Describe Basis for Conclusion:</p>	

10.

<p>Written Standards: Were all activities carried out in compliance with the applicable written standards for targeting and providing essential services related to street outreach?</p> <p>[24 CFR 576.400(e)(1), (2), and (3)(ii)]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around;"> Yes No N/A </div>
<p>Describe Basis for Conclusion:</p>	

Guide for Monitoring of ESG Emergency Shelter Requirements			
Name of Recipient:			
Name of Subrecipient(s):			
Staff Consulted:			
Name(s) of Reviewer(s)		Date	

NOTE: All questions that address requirements contain the citation for the source of the requirement (statute, regulation, or grant agreement). If the requirement is not met, Ramsey County must select "NO" in response to the question and make a finding of noncompliance. All other questions that do not contain the citation for the requirement do not address requirements but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "**finding.**"

Instructions: This document is designed to assess the recipient's compliance with the Emergency Shelter component of the Emergency Solutions Grant (ESG) program. The eligible activity areas of review include the costs of providing essential services to homeless families and individuals in emergency shelters, renovating buildings to be used as emergency shelter for homeless families and individuals, and operating emergency shelters. This document is divided into two sections: Eligible Activities in Emergency Shelters; and Other Requirements for Emergency Shelters.

It is the responsibility of the Ramsey County reviewer to ensure that the responses provide sufficient documentation to support the basis for the conclusions. Keep in mind that, if multiple entities are reviewed and a deficiency is identified for a single entity, a "No" response is required.

Questions:

A. ELIGIBLE ACTIVITIES IN EMERGENCY SHELTERS

1.

Did the recipient's or its subrecipients' records reflect that each emergency shelter funded with ESG meet the definition of emergency shelter? [24 CFR 576.2; 24 CFR 576.102]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

2.

Were all essential services provided only in an emergency shelter or to homeless individuals and families staying in emergency shelter? [24 CFR 576.102(a)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

3.

Essential Services (Case Management): Were ESG funds used for the costs of eligible activities listed under 24 CFR 576.102(a)(1)(i)(A)-(H), for the purposes of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant? [24 CFR 576.102(a)(1)(i)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

4.

Essential Services (Childcare): Were ESG funds used for eligible costs of childcare, including providing meals and snacks, comprehensive and coordinated sets of appropriate developmental activities, and also: <ul style="list-style-type: none"> a. in a childcare center that was licensed by the jurisdiction in which it operates; and b. for program participants under the age of 13 (unless the child is disabled and then the child must be under the age of 18)? [24 CFR 576.102(a)(1)(ii)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

5.

Essential Services (Education Services): Were ESG funds used for the costs of improving knowledge and basic educational skills, including eligible services and activities, only when necessary for the program participant to obtain and maintain housing, and as listed under 24 CFR 576.102(a)(1)(iii)? [24 CFR 576.102(a)(1)(iii)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

6.

Essential Services (Employment Assistance and Job Training): Were ESG funds used for eligible costs of employment assistance and job training programs, including, but not limited to, classroom, online and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential, and providing reasonable stipends to program participants in employment assistance and job training programs? [24 CFR 576.102(a)(1)(iv)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

7.

<p>Essential Services (Outpatient Health Services): Were ESG funds used for the provision of direct outpatient treatment of medical conditions (as listed under 24 CFR 576.102(a)(1)(v)), and is the treatment provided:</p> <ul style="list-style-type: none"> a. by licensed medical professionals, and b. only to the extent that other appropriate health services are unavailable within the community? <p>[24 CFR 576.102(a)(1)(v)]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
<p>Describe Basis for Conclusion:</p>	

8.

<p>Essential Services (Legal Services): Were legal services costs paid for with ESG funds only used:</p> <ul style="list-style-type: none"> a. for hourly fees, or, if the cost was less than the cost of hourly fees, fees based on the actual service performed (i.e., fee for service); b. for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, or by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing; c. only to the extent that other appropriate legal services are unavailable or inaccessible within the community; and d. only for eligible subjects, services, and activities listed in 24 CFR 576.102(a)(1)(vi)? <p>[24 CFR 576.102(a)(1)(vi)]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
<p>Describe Basis for Conclusion:</p>	

9.

<p>Essential Services (Life Skills Training): Were ESG funds used for the eligible costs of teaching critical life management skills that might never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness, as listed under 24 CFR 576.102(a)(i)(vii), and was the training necessary to assist the program participant to function independently in the community?</p> <p>[24 CFR 576.102(a)(i)(vii)]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
<p>Describe Basis for Conclusion:</p>	

10.

<u>Essential Services (Mental Health Services)</u> : Were ESG funds used for the provision of eligible treatment of mental health conditions, as described under 24 CFR 576.102(a)(1)(viii), and was that treatment: <ul style="list-style-type: none"> a. by licensed professionals; and b. only to the extent that other appropriate health services are unavailable or inaccessible within the community? [24 CFR 576.102(a)(1)(viii)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

11.

<u>Essential Services (Substance Abuse Treatment Services)</u> : Were ESG funds used for eligible substance abuse treatment services (as listed under 24 CFR 576.102(a)(1)(ix)) designed to prevent, reduce, eliminate or deter relapse of substance abuse or addictive behaviors, and were the services: <ul style="list-style-type: none"> a. provided by licensed or certified professionals, and b. only to the extent that other appropriate substance abuse treatment are unavailable or inaccessible within the community? [24 CFR 576.102(a)(1)(ix)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

12.

<u>Essential Services (Transportation)</u> : Were ESG funds used for transportation costs for travel by program participants to and from medical care, employment, child care, or other eligible essential services facilities, and only for eligible costs as listed under 24 CFR 576.102(a)(1)(x)? [24 CFR 576.102(a)(1)(x)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

13.

<u>Renovation</u> : If ESG funds were used for renovation, including major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter: <ul style="list-style-type: none"> a. were ESG funds used only for the costs of labor, materials, tools, and other eligible costs for renovation; and b. was the emergency shelter owned by a government entity or private nonprofit organization? [24 CFR 576.102(a)(2)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

14.

Shelter Operations: Did the recipient's or its subrecipients' records document that ESG funds were used for the costs of maintenance, rent, security, fuel, equipment, insurance, utilities, food, furnishings, supplies necessary for the operation of the emergency shelter, and, when no appropriate emergency shelter is available, for hotel or motel vouchers for homeless families or individuals? [24 CFR 576.102(a)(3); 24 CFR 576.500(k); 24 CFR 576.500(u)(2)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion:			

B. OTHER REQUIREMENTS FOR EMERGENCY SHELTERS

15.

Terminating Assistance: If the recipient or its subrecipients terminated any participants from the program, did they: <ul style="list-style-type: none"> a. do so in accordance with a formal process established by the recipient or subrecipient that recognizes the rights of individuals affected; and b. examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases? [24 CFR 576.402(a)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion:			

16.

Uniform Relocation Assistance (URA): If ESG funds were used to provide relocation assistance for displaced persons, did those persons meet the definition of "displaced person" under 24 CFR 576.408(c)(2) and did the assistance consist only of costs authorized under 24 CFR 576.102(a)(4) and 24 CFR 576.408(c)(1)? [24 CFR 576.102(a)(4); 24 CFR 576.408(c)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion:			

17.

Minimum Period of Use (Renovation): Are all buildings renovated with ESG funds being maintained as a shelter for homeless individuals and families for a period, starting from the date they were first occupied by a homeless individual or family after the completed renovation, of not less than: <ul style="list-style-type: none"> a. 10 years for major rehabilitation; b. 10 years for conversion; c. 3 years for renovation other than major rehabilitation or conversion? [24 CFR 576.102(c)(1)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion:			

18.

<u>Minimum Period of Use (Essential Services/Shelter Operations)</u> : Where the recipient or its subrecipient has used ESG funds under the Emergency Shelter component solely for essential services or shelter operations, has the recipient or subrecipient provided services or shelter to homeless individuals and families at least for the period during which the ESG funds are provided? [24 CFR 576.102(c)(2)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Yes No N/A	
Describe Basis for Conclusion: 	

19.

<u>Maintenance of Effort</u> : If the recipient or its subrecipient is a unit of general purpose local government, and ESG funds were used to replace local government funding for emergency shelter services, did HUD determine that the unit of general purpose local government was in a severe financial deficit? [24 CFR 576.500(l); 24 CFR 576.102(d)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Yes No N/A	
Describe Basis for Conclusion: 	

20.

<u>Involuntary Family Separation (Emergency Shelter)</u> : Did the recipient or its subrecipients have policies and procedures in place to ensure that providers of emergency shelter that serve households with children under 18 do not deny admission to a family based on the age of any child under 18? [24 CFR 576.102(b)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Yes No N/A	
Describe Basis for Conclusion: 	

21.

<u>State or Local Safety and Sanitation Standards</u> : If ESG funds were used for shelter renovation (including major rehabilitation or conversion of a building to be used as an emergency shelter), does the shelter meet state or local government safety and sanitation standards (as applicable)? [24 CFR 576.403(b)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Yes No N/A	
Describe Basis for Conclusion: 	

22.

<u>Minimum ESG Habitability Standards:</u> If ESG funds were used for shelter operations or renovation, do the records of the recipient and its subrecipients reflect that the shelter met the minimum safety, sanitation, and privacy standards set forth at 24 CFR 576.403, including inspection reports required by 24 CFR 576.500(j)? [24 CFR 576.403(b); 24 CFR 576.500(j)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

23.

<u>Recordkeeping (Emergency Shelters):</u> Did the recipient or its subrecipients keep records of the emergency shelters assisted under the ESG program, including: <ul style="list-style-type: none"> a. the amounts and type of assistance, including essential services, provided to each emergency shelter; b. if applicable, documentation of the value of the building before the rehabilitation of an existing shelter or after the conversion of a building into an emergency shelter, and copies of the recorded deed or use restrictions? [24 CFR 576.500(k)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

24.

<u>Written Standards:</u> Were all activities carried out in compliance with the applicable written policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, e.g., victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest? [24 CFR 576.400(e)(1); 24 CFR 576.400(e)(2); 24 CFR 576.400(e)(3)(iii)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

25.

<u>Written Standards:</u> Were all activities carried out in compliance with the applicable written policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter? [24 CFR 576.400(e)(1), (2), and (3)(iv)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

26.

<p><u>Written Standards:</u> Were all activities carried out in compliance with the applicable written policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers; other homeless assistance providers; and mainstream service and housing providers?</p> <p>[24 CFR 576.400(e)(1); 24 CFR 576.400(e)(2); 24 CFR 576.400(e)(3)(v)]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around;"> Yes No N/A </div>
<p>Describe Basis for Conclusion:</p>	

Guide for Monitoring of ESG Rapid Re-housing and Homelessness Prevention Requirements			
Name of Recipient:			
Name of Subrecipient(s):			
Staff Consulted:			
Name(s) of Reviewer(s)		Date	

NOTE: All questions that address requirements contain the citation for the source of the requirement (statute, regulation, or grant agreement). If the requirement is not met, Ramsey County must select "NO" in response to the question and make a finding of noncompliance. All other questions that do not contain the citation for the requirement do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "finding."

Instructions: This document is designed to assess the recipient's compliance with the Rapid Re-housing and/or Homelessness Prevention component(s) of the Emergency Solutions Grant (ESG) program. The eligible activity areas of review include: Housing Relocation and Stabilization Services – Services; Housing Relocation and Stabilization Services – Financial Assistance; and Short- and Medium-term Rental Assistance. These activities are eligible when necessary to either (1) help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing, or (2) prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the "homeless" definition in 24 CFR 576.2.

The document is divided into three sections: General Requirements; Housing Relocation and Stabilization Services; and Short- and Medium-term Rental Assistance. Section B is broken down into sub-sections for Financial Assistance Costs and Services Costs. Section C is broken down into sub-sections for General Requirements and Project-based Rental Assistance. Every question has a header identifying the specific area of review. If the ESG recipient has not funded a particular activity or cost, check the N/A box and continue on to the next section, sub-section, or question of the document.

It is the responsibility of the Ramsey County reviewer to ensure that the responses provide sufficient documentation to support the basis for the conclusions. Keep in mind that, if multiple entities are reviewed and a deficiency is identified for a single entity, a "No" response is required.

Questions:

A. GENERAL REQUIREMENTS

1.

Initial Evaluation: Did the recipient or its subrecipient conduct an initial evaluation to determine each individual's or family's eligibility for rapid re-housing or homelessness prevention assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing? [24 CFR 576.401(a)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion:			

2.

<p>Eligibility Criteria (Homelessness Prevention): Did the recipient or its subrecipient document that all program participants who received homelessness prevention assistance:</p> <p>a. met the eligibility criteria of the “at risk of homelessness” definition or categories 2, 3, or 4 (if category 4, not sleeping in a place described in category (1)) of the “homeless” definition; and</p> <p>b. have an annual income (as determined in accordance with 24 CFR 5.609) below 30% AMI?</p> <p>[24 CFR 576.103; 24 CFR 576.401(c); 24 CFR 576.500(b); 24 CFR 576.500(c); 24 CFR 576.500(e); 24 CFR 576.500(f)]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around;"> Yes No N/A </div>
<p>Describe Basis for Conclusion:</p>	

3.

<p>Eligibility Criteria (Rapid Re-housing): Did the recipient or its subrecipient document that all program participants who received rapid re-housing assistance met the eligibility criteria:</p> <p>a. under category (1) of the homeless definition, <u>or</u></p> <p>b. under category (4) <u>and</u> live in an emergency shelter or place described in category (1) of the homeless definition?</p> <p>[24 CFR 576.104; 24 CFR 576.500(b); 24 CFR 576.500(f)]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around;"> Yes No N/A </div>
<p>Describe Basis for Conclusion:</p>	

4.

<p>Re-evaluations (Rapid Re-housing/Homelessness Prevention): Do program participant records document that the recipient or its subrecipient re-evaluated program participants’ eligibility and the types and amounts of assistance the program participant needs not less than once every 3 months for program participants receiving homelessness prevention assistance and not less than once annually for program participants receiving rapid re-housing assistance?</p> <p>[24 CFR 576.401(b)(1); 24 CFR 576.500(f)]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around;"> Yes No N/A </div>
<p>Describe Basis for Conclusion:</p>	

5.

<p>Written Standards:</p> <p>a. Did the recipient and/or its subrecipients adopt written standards for the provision of homelessness prevention and rapid re-housing assistance, as required by 24 CFR 576.400(e)(1) and 24 CFR 576.400(e)(2)?</p> <p>b. Did these written standards cover the following topics (listed in 24 CFR 576.400(e)(3)):</p> <ol style="list-style-type: none"> 1. evaluating individuals' and families' eligibility for assistance under ESG; 2. coordination among emergency shelter providers, essential services providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers; 3. determining and prioritizing which eligible families and individuals would receive homelessness prevention assistance and which eligible families and individuals would receive rapid re-housing assistance; 4. determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid re-housing assistance; 5. determining how long the program participant will be provided with rental assistance and whether and how the amount of that assistance would be adjusted over time; 6. determining the type, amount, and duration of housing stabilization and/or relocation services to provide to the program participant? <p>c. Do the program participant records show that homelessness prevention and rapid re-housing assistance were provided in accordance with the applicable written standards?</p> <p>[24 CFR 576.400(e)(1); 24 CFR 576.400(e)(2); 24 CFR 576.400(e)(3)(i); 24 CFR 576.400(e)(3)(v); 24 CFR 576.400(e)(3)(vi); 24 CFR 576.400(e)(3)(vii); 24 CFR 576.400(e)(3)(viii); 24 CFR 576.400(e)(3)(ix); 24 CFR 576.500(f)]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around;"> Yes No N/A </div>
<p>Describe Basis for Conclusion:</p>	

6.

<p>Re-evaluations (Rapid Re-housing/Homelessness Prevention): Do program participant records document that each re-evaluation of eligibility established that the program participant:</p> <p>a. did not have an annual income that exceeds 30% AMI as established by HUD; and</p> <p>b. lacked sufficient resources and support networks necessary to retain housing without ESG assistance?</p> <p>[24 CFR 576.401(b)(1)(i)-(ii); 24 CFR 576.500(e); 24 CFR 576.500(f)]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around;"> Yes No N/A </div>
<p>Describe Basis for Conclusion:</p>	

7.

<u>Recordkeeping (Ineligibility)</u> : For each individual and family determined ineligible to receive ESG assistance, did the recipient or its subrecipient document the reason for that determination? [24 CFR 576.500(d)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion: 	

8.

<u>Eligible Costs (Homelessness Prevention)</u> : Were all homelessness prevention costs eligible and necessary to help the program participant regain stability in the program participant's current housing or to move into other permanent housing and achieve stability in that housing? [24 CFR 576.103; 24 CFR 576.500(f)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion: 	

9.

<u>Housing Stability Case Management</u> : While providing rapid re-housing or homelessness prevention assistance to a program participant, does the program participant file document that the program participant met with a case manager at least once per month to assist the participant in ensuring long-term housing stability? [24 CFR 576.401(e)(1); 24 CFR 576.500(f)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion: 	

10.

<u>Housing Stability Case Management</u> : While providing rapid re-housing or homelessness prevention assistance to a program participant, did the recipient or its subrecipient document in the program participant's file that it developed a plan to assist the program participant to retain permanent housing after the ESG assistance ends, taking into account all relevant considerations, such as the program participant's current or expected income and expenses, other public or private assistance for which the program participant will be eligible and likely to receive; and the relative affordability of available housing in the area? [24 CFR 576.401(e)(2); 24 CFR 576.500(f)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion: 	

11.

<p>Connections to Mainstream and Other Resources: While providing rapid re-housing or homelessness prevention assistance to program participants, did the recipient or its subrecipients assist each program participant to obtain mainstream and other resources as needed?</p> <p>[24 CFR 576.401(d)(1); 24 CFR 576.401(d)(2); 24 CFR 576.500(f)]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
<p>Describe Basis for Conclusion:</p>	

12.

<p>Recordkeeping (Program Participant Records): Did each program participant record document:</p> <p>a. the services and assistance provided to that program participant, including, as applicable, security deposit, rental assistance, and utility payments made on behalf of the program participant; and</p> <p>b. compliance with all applicable requirements for providing services and assistance to that program participant?</p> <p>[24 CFR 576.500(f)]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
<p>Describe Basis for Conclusion:</p>	

13.

<p>Terminating Assistance:</p> <p>a. If the recipient or any of its subrecipients terminated any participants from the program, did they do so in accordance with a formal process established by the recipient or its subrecipient(s) that recognizes the rights of individuals affected, that met the following requirements:</p> <p>(1) written notice to the program participant containing a clear statement of the reasons for termination,</p> <p>(2) a review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate) who made or approved the termination decision, and</p> <p>(3) prompt written notice of the final decision to the program participant?</p> <p>b. Did the recipient and/or its subrecipient examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases?</p> <p>[24 CFR 576.402(a); 24 CFR 576.402(b)]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
<p>Describe Basis for Conclusion:</p>	

14.

<p>Lead-Based Paint: Where ESG funds were used for rental assistance (TBRA or PBRA) or supportive services, do records reflect that the recipient and subrecipient complied with all lead-based paint requirements?</p> <p>NOTE: Exhibit 24-2 (Supportive Services), Exhibit 24-3 (TBRA), or Exhibit 24-4 (PBRA), as applicable, MUST be completed to answer this question. See Chapter 24, <i>Lead-Based Paint Compliance</i>, in this Handbook.</p> <p>[24 CFR 35.700-730 (PBRA); 24 CFR 35.1000-1020 (Supportive Services); 24 CFR 35.1200-1225 (TBRA); 24 CFR 576.403(a)]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A </div>
<p>Describe Basis for Conclusion:</p>	

15.

<p>Minimum Habitability Standards: Did the recipient and its subrecipients ensure that all housing units met the minimum habitability standards before incurring any costs to help program participants remain in or move into those housing units?</p> <p>[24 CFR 576.403(c); 24 CFR 576.500(j)]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A </div>
<p>Describe Basis for Conclusion:</p>	

16.

<p>Conflicts of Interest (Organizational): Did the recipient and its subrecipients ensure that:</p> <p>a. no type or amount of ESG assistance was conditioned on an individual or family's acceptance of housing owned by the recipient, subrecipient, contractor, parent, or subsidiary of the subrecipient; and</p> <p>b. no subrecipient (nor any of its parent or subsidiary organizations) that owns housing, carried out the initial evaluation under 24 CFR 576.401, or administered homelessness prevention assistance for occupants of that subrecipient's housing?</p> <p>[24 CFR 576.404(a)]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A </div>
<p>Describe Basis for Conclusion:</p>	

B. HOUSING RELOCATION AND STABILIZATION SERVICES

Financial Assistance Costs: If the recipient has not expended ESG funds on Financial Assistance costs, check the N/A boxes and skip to the Services Costs subsection of this Exhibit.

17.

<p><u>Financial Assistance Costs:</u> Did the recipient and its subrecipients ensure that:</p> <p>a. no program participant received financial assistance under 24 CFR 576.105(a) that was of the same type of assistance that the program participant was receiving through other public sources; and</p> <p>b. no program participant who received replacement housing payments under the Uniform Relocation Act (URA) received financial assistance under 24 CFR 576.105(a) during the period of time covered by the URA payments?</p> <p>[24 CFR 576.105(d)]</p>	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
<p>Describe Basis for Conclusion:</p>							

18.

<p><u>Financial Assistance Costs:</u> Were eligible costs listed in 24 CFR 576.105(a) paid only to a housing owner, utility company, or other third party (not directly to the program participant)?</p> <p>[24 CFR 576.105(a)]</p>	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
<p>Describe Basis for Conclusion:</p>							

19.

<p><u>Financial Assistance Costs (Rental Housing Application Fees):</u> Were rental housing application fees paid for with ESG funds a standard charge issued by the owner to all applicants?</p> <p>[24 CFR 576.105(a)(1)]</p>	<table border="0"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Yes</td> <td>No</td> <td>N/A</td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yes	No	N/A
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
Yes	No	N/A					
<p>Describe Basis for Conclusion:</p>							

20.

Financial Assistance Costs (Security Deposits): Were security deposits paid for with ESG funds equal to no more than 2 months' rent? [24 CFR 576.105(a)(2)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

21.

Financial Assistance Costs (Last Month's Rent): Were costs for the last month's rent paid for with ESG funds: a. necessary to obtain housing for a program participant; b. paid to the owner of the housing at the time the owner was paid the security deposit and first month's rent; c. less than or equal to one month's rent; <u>and</u> d. included in calculating the program participant's total rental assistance? [24 CFR 576.105(a)(3)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

22.

Financial Assistance Costs (Utility Deposits): Were utility deposits paid for with ESG funds only for eligible types of utility services (gas, electric, water, and sewage) and required by the utility company for all customers? [24 CFR 576.105(a)(4)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

23.

Financial Assistance Costs (Utility Payments): Were utility payments paid for with ESG funds: a. within the limit of 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service; b. only provided when the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments; <u>and</u> c. only for eligible types of utility services (gas, electric, water, and sewage)? [24 CFR 576.105(a)(5)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

24.

Financial Assistance Costs (Moving Costs): Were moving costs paid for with ESG funds only for moving-related activities such as truck rental, hiring a moving company, and allowable temporary storage fees (up to 3 months, fees accrued after the date the program participant began receiving services and before the program participant moves into permanent housing, and excluding storage fees in arrears)? [24 CFR 576.105(a)(6)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion: 	

Services Costs: If the recipient has not expended ESG funds on Services costs, check the N/A boxes and skip to the Short- and Medium-Term Rental Assistance section of this Exhibit (Section C).

25.

Services Costs (Housing Search and Placement): Were housing search and placement costs paid for with ESG funds: a. necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing; and b. one of those listed in 24 CFR 576.105(b)(1)(i)-(viii)? [24 CFR 576.105(b)(1)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion: 	

26.

Services Costs (Housing Stability Case Management): Were the activities paid for with ESG funds: a. one of those listed in 24 CFR 576.105(b)(2)(A)-(H), and b. for the purposes of assessing, arranging, coordinating, or monitoring the delivery of individualized services to: (1) facilitate housing stability for a program participant who resides in permanent housing; or (2) to assist a program participant in overcoming immediate barriers to obtaining housing? [24 CFR 576.105(b)(2)(A)-(H)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion: 	

27.

<p>Services Costs (Housing Stability Case Management): Were the housing stability case management costs paid for with ESG funds:</p> <p>a. under the Rapid Re-housing component, limited to:</p> <p>(1) 30 days during the period the program participant is seeking permanent housing; and</p> <p>(2) 24 months during the period the program participant is living in permanent housing; and</p> <p>b. under the Homelessness Prevention component, limited to 24 months? [24 CFR 576.105(b)(2)]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around;"> Yes No N/A </div>
<p>Describe Basis for Conclusion:</p>	

28.

<p>Services Costs (Mediation Costs): Were mediation costs paid for with ESG funds necessary to prevent the program participant from losing permanent housing in which the program participant currently resides, and used for mediation between the program participant and the owner or person(s) with whom the participant is living? [24 CFR 576.105(b)(3)]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around;"> Yes No N/A </div>
<p>Describe Basis for Conclusion:</p>	

29.

<p>Services Costs (Legal Services): Did the recipient and its subrecipients ensure that the legal services costs paid for with ESG funds consisted only of the following types of costs:</p> <p>a. for either: hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, or by person(s) under the supervision of the licensed attorney; or fees based on the actual service performed (i.e., fee for service), where the recipient/ subrecipient documented that such costs were less than what the cost of hourly fees would have been;</p> <p>b. for filing fees and other necessary court costs;</p> <p>c. subrecipients' employees' salaries and other costs necessary to perform the services (if the subrecipient is a legal services provider and performs the services itself); and</p> <p>d. for the following component services:</p> <p>(1) client intake;</p> <p>(2) preparation of cases for trial;</p> <p>(3) provision of legal advice;</p> <p>(4) representation at hearings;</p> <p>(5) counseling?</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around;"> Yes No N/A </div>
---	--

[24 CFR 576.102(a)(1)(vi)(A); 24 CFR 576.102(a)(1)(vi)(D); 24 CFR 576.102(a)(1)(vi)(E); 24 CFR 576.105(b)(4)]	
Describe Basis for Conclusion:	

30.

<p>Services Costs (Legal Services): Did the recipient and its subrecipients ensure that the legal services costs paid for with ESG funds were only used:</p> <p>a. to the extent necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which they currently reside;</p> <p>b. for the following subject matters:</p> <ul style="list-style-type: none"> (1) landlord/tenant matters; (2) child support; (3) guardianship; (4) paternity; (5) emancipation; (6) legal separation; (7) orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; (8) appeal of veterans and public benefit claim denials; and (9) the resolution of outstanding criminal warrants; and <p>c. to the extent that other appropriate legal services were unavailable or inaccessible in the community?</p> <p>[24 CFR 576.105(b)(4); 24 CFR 576.102(a)(1)(vi)(B); 24 CFR 576.102(a)(1)(vi)(C)]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

31.

<p>Services Costs (Credit Repair): Were credit repair costs paid for with ESG funds for counseling or other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, or resolving personal credit problems?</p> <p>[24 CFR 576.105(b)(5)]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

32.

Services Costs (Credit Repair): Did credit repair costs paid for with ESG funds exclude the payment or modification of a debt? [24 CFR 576.105(b)(5)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

C. SHORT- AND MEDIUM-TERM RENTAL ASSISTANCE

General Requirements: If the recipient has not expended ESG funds on Short- or Medium-Term Rental Assistance, check the N/A boxes and skip to the next section.

33.

Rental Assistance (Limit): Did each program participant's total rental assistance, including any rental arrears and last month's rent, stay within the limit of 24 months during any 3-year period? [24 CFR 576.106(a)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

34.

Rental Assistance (Changes in Household Composition): Did the recipient and its subrecipients apply the limits on rental assistance to the total assistance each individual received, either as an individual or as part of a household? [24 CFR 576.106(j)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

35.

Rental Assistance (Use with Other Subsidies): Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, did the provision of rental assistance exclude: <ul style="list-style-type: none"> a. program participants who were receiving tenant-based rental assistance or living in a housing unit receiving project-based rental assistance or operating assistance through other public sources; and b. program participants who were provided with replacement housing payments under the URA during the period of time covered by the URA payments? [24 CFR 576.106(c)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

36.

<p>Rental Assistance (Fair Market Rent and Rent Reasonableness): Did the recipient and its subrecipients ensure that ESG rental assistance was only provided to units for which the rent complied with HUD's standard of rent reasonableness and did not exceed the applicable Fair Market Rent?</p> <p>NOTE: For this purpose, rent equals the sum of the total monthly rent for the unit, any fees required for occupancy under the lease (other than late fees and pet fees) and, if the tenant paid separately for utilities, the monthly allowance for utilities (excluding telephone) established by the public housing authority for the area in which the housing is located.</p> <p>[24 CFR 576.106(d)(1); 24 CFR 576.106(d)(2); 24 CFR 576.500(i)]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around;"> Yes No N/A </div>
<p>Describe Basis for Conclusion:</p>	

37.

<p>Rental Assistance (Rental Assistance Agreement): Does the documentation show that the recipient or its subrecipients entered into a rental assistance agreement with each owner before providing the owner with rental assistance payments, including rental arrears?</p> <p>[24 CFR 576.106(e); 24 CFR 576.500(h)]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around;"> Yes No N/A </div>
<p>Describe Basis for Conclusion:</p>	

38.

<p>Rental Assistance (Rental Assistance Agreement): Did each rental assistance agreement:</p> <ol style="list-style-type: none"> set forth the terms under which rental assistance will be provided, including the requirements that apply under 24 CFR 576.106; provide that, during the term of the agreement, the owner must give the recipient or its subrecipient a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant; and contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease? <p>[24 CFR 576.106(e); 24 CFR 576.106(f)]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around;"> Yes No N/A </div>
<p>Describe Basis for Conclusion:</p>	

39.

Rental Assistance (Payments): Did the recipient or its subrecipient make timely payments to each owner in accordance with the rental assistance agreement? [24 CFR 576.106(f)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

40.

Rental Assistance (Payments): Did the recipient and its subrecipients pay any late payment penalties that they incurred only with <u>non-ESG funds</u> (i.e., no ESG funds were used to pay late payment penalties incurred by the recipient or subrecipient)? [24 CFR 576.106(f)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

41.

Rental Assistance (Leases):	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. Does each program participant receiving rental assistance have a file that contains a legally binding, written lease between the program participant and the owner of the property or his/her agent for the rental unit; OR	Yes	No	N/A
b. If the assistance was solely for rental arrears for a program participant who had an oral lease agreement in place:			
(1) does each agreement give the program participant an enforceable leasehold interest under state law; and			
(2) are the agreement and rent owed sufficiently documented by the owner's financial records, rent ledgers, or canceled checks?			
[24 CFR 576.106(g); 24 CFR 576.500(h)]			
Describe Basis for Conclusion:			

42.

Rental Assistance (Rental Arrears): Were the rental arrears paid for with ESG funds one-time payments that did not exceed 6 months of rent in arrears (including any late fees on those arrears)? [24 CFR 576.106(a)(3)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

43.

<u>Recordkeeping (Homelessness Prevention and Rapid Re-housing)</u> : Did the recipient or its subrecipient keep records, including copies of documentation of payments made to owners for rental assistance provided, and supporting documentation for these payments, including dates of occupancy by program participants? [24 CFR 576.500(h)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

44.

<u>Rental Assistance (TBRA)</u> : For tenant-based rental assistance, did the recipient and its subrecipients terminate the rental assistance agreement with the owner and stop providing rental assistance payments under that agreement when any of the following conditions were met: a. the program participant moved out of the unit for which the program participant has a lease; b. the lease terminated and was not renewed; or c. the program participant became ineligible to receive ESG assistance? [24 CFR 576.106(h)(3)(i)-(iii)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

Project-Based Rental Assistance (PBRA): If the recipient has not expended funds on PBRA, check the N/A boxes. This is the final subsection of the Exhibit.

45.

<u>Rental Assistance (Project-based Rental Assistance)</u> : If the recipient or any of its subrecipients used ESG funds to pay the rent for a project-based unit before a program participant moved into the unit, does the program participant file reflect that : a. the program participant signed a lease and moved into the unit before the end of the month for which the first month's rent was paid; and b. the amount paid was less than or equal to the rent to be charged under the program participant's lease and included when determining that program participant's total rental assistance? [24 CFR 576.106(i)(2)]	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

46.

Rental Assistance (PBRA): Did the recipient and its subrecipients make monthly rental assistance payments only for months when a unit was leased to a program participant (either partial or the whole month)? [24 CFR 576.106(i)(3)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

47.

Rental Assistance (PBRA): For program participants living in housing with project-based rental assistance, does the program participant's file contain a lease with an initial term of at least 1 year AND did the recipient or its subrecipient (whoever signed the agreement) enter into a rental assistance agreement with the owner for an initial term of 1 year? [24 CFR 576.106(g); 24 CFR 576.106(i)(5)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

48.

Rental Assistance (PBRA): If a program participant was determined ineligible or reaches the maximum number of months over which rental assistance could be provided, did the recipient or its subrecipient suspend or terminate the rental assistance payments for the unit? [24 CFR 576.106(i)(4)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

49.

Rental Assistance (PBRA): Did the recipient and its subrecipients ensure that the term of occupancy in each program participant's lease was not conditioned on the provision of rental assistance payments, and if ESG-funded rental assistance was suspended, was the program participant allowed to remain in the unit as permitted under the lease? [24 CFR 576.106(i)(4)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

50.

Rental Assistance (PBRA – Expenditure Deadline): Did the recipient and its subrecipients commit ESG funds only to be expended: a. within the expenditure deadline in 24 CFR 576.203; and b. for current ESG grants (i.e., not before a grant is awarded)? [24 CFR 576.106(i)(5)]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

ATTACHMENT H

Date:
 Provider:
 Project Type:
 HMIS:
 Reviewer:
 Reviewer Organization:

Review Key:	
	= In file
	= Not in file

Ramsey County ESG Client File Review Matrix	Ramsey County ESG ESG CLIENT FILE MATRIX: FORMS REQUIRED BY ACTIVITY							
	EMERGENCY SHELTER OPERATIONS	EMERGENCY SHELTER SERVICES	STREET OUTREACH	PREVENTION SERVICES	PREVENTION FINANCIAL ASSISTANCE	RAPID REHOUSING SERVICES	RAPID REHOUSING FINANCIAL ASSISTANCE	INELIGIBLE CLIENT FILE
ESG Emergency Shelter and Street Outreach Client File Checklist	X	X						
ESG Street Outreach Client File Checklist			X					
ESG RRH Client File Checklist						X	X	
ESG Homeless Prevention Client File Checklist				X	X			
ESG Ineligible Client File Checklist								X
ESG Verification of Homeless Status	X	X	X	X	X	X	X	X
ESG Street Outreach and Emergency Shelter Intake Form	X	X	X					
ESG RRH and Prevention Intake Form				X	X	X	X	
ESG Third Party Verification of Client's Income				X	X	X	X	
ESG Client's Self-Certification of Income				X	X	X	X	
ESG Income Calculation Worksheet				X	X	X	X	
ESG Housing Barriers Matrix and Initial Housing Stabilization Plan	X	X	X	X	X	X	X	
ESG Stabilization Action Plan Monthly Update				X	X	X	X	
ESG Financial Assistance Tracking Form					X		X	
ESG Rental Assistance Agreement				X	X	X	X	
ESG Rent Reasonableness Checklist and Certification				X	X	X	X	
ESG HUD VAWA Form 5380 (Required)				X	X	X	X	
ESG HUD VAWA Form 5381 (Required if applicable)				X	X	X	X	
ESG HUD VAWA Form 5382 (Required)				X	X	X	X	
ESG HUD VAWA Form 5383 (Required if applicable)				X	X	X	X	
ESG Housing Stabilization Minimum Habitability Standards Checklist				X	X	X	X	
ESG Client Exit Form*	X	X	X	X	X	X	X	

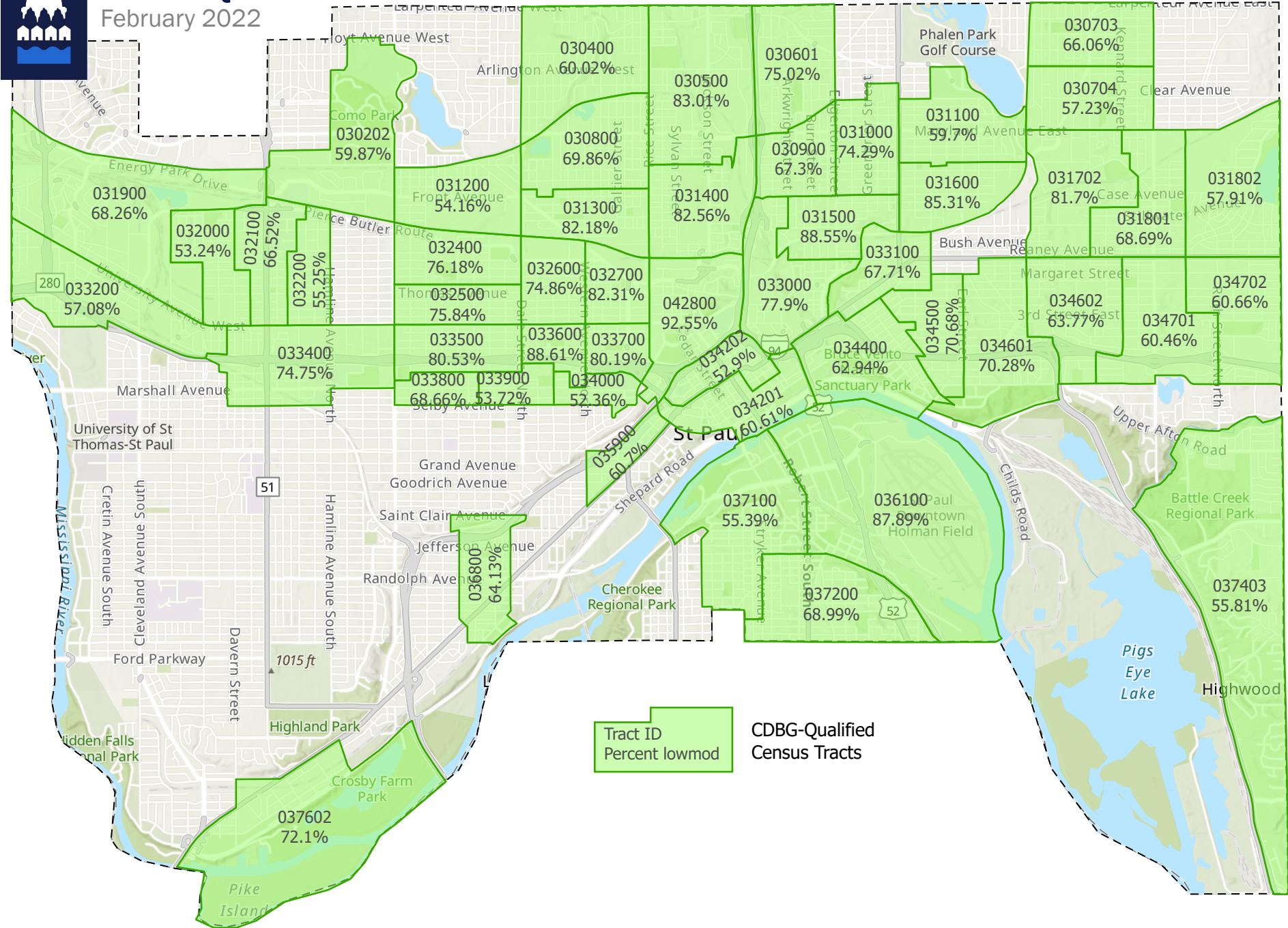
Notes:



CDBG-Qualified Census Tracts

February 2022

ATTACHMENT I



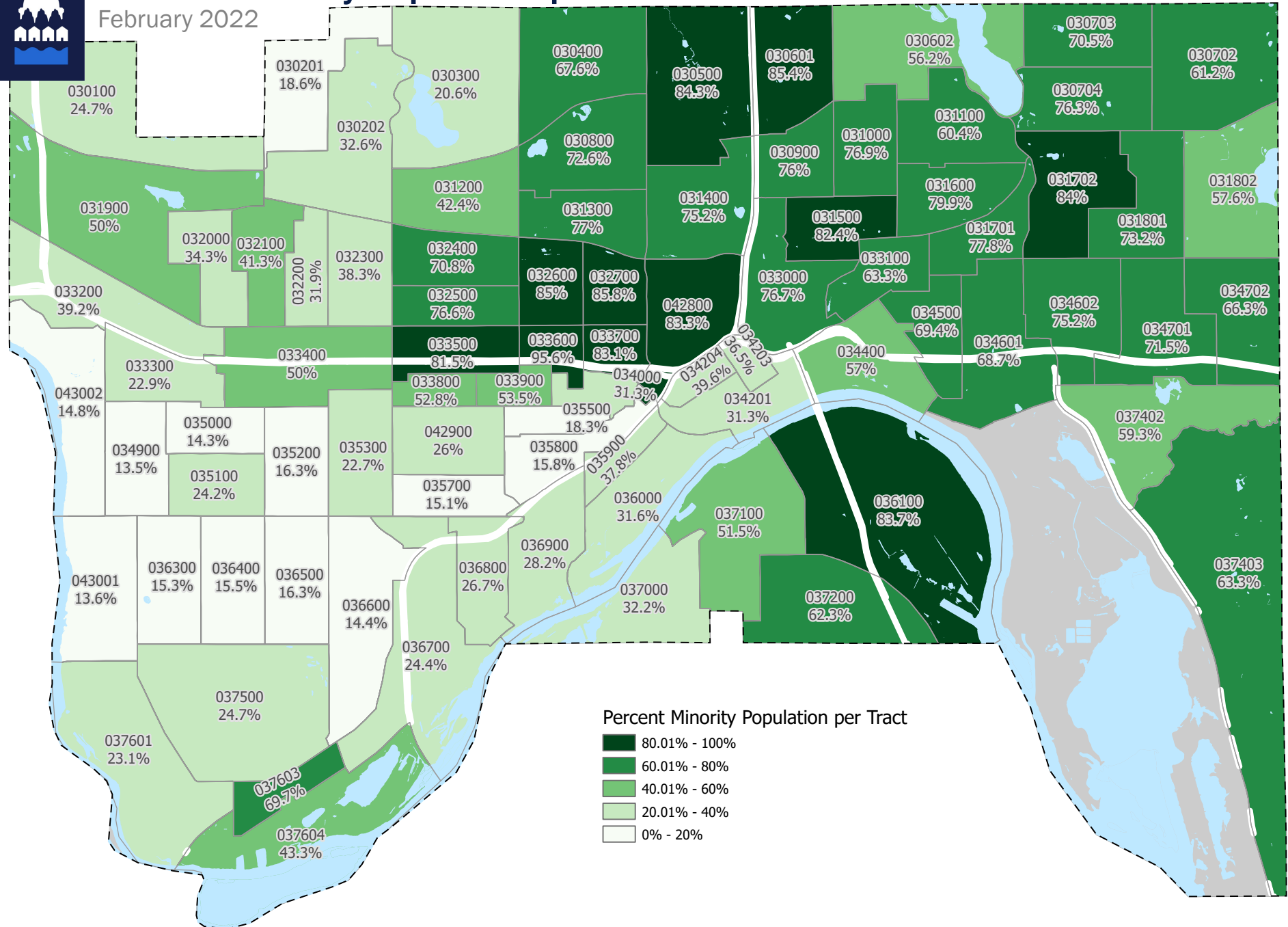
CITY OF SAINT PAUL, MINNESOTA CDBG Eligible Census Tracts - 2022				
Geo ID	Census Tract	Low-Income Population in Tract	Total Population in Tract	% Low-Income
27123030202	30202	1350	2255	59.87%
27123030400	30400	2905	4840	60.02%
27123030500	30500	4470	5385	83.01%
27123030601	30601	4190	5585	75.02%
27123030703	30703	2345	3550	66.06%
27123030704	30704	2335	4080	57.23%
27123030800	30800	3465	4960	69.86%
27123030900	30900	2470	3670	67.30%
27123031000	31000	3640	4900	74.29%
27123031100	31100	2015	3375	59.70%
27123031200	31200	1465	2705	54.16%
27123031300	31300	1960	2385	82.18%
27123031400	31400	2320	2810	82.56%
27123031500	31500	2475	2795	88.55%
27123031600	31600	3920	4595	85.31%
27123031702	31702	4865	5955	81.70%
27123031801	31801	3335	4855	68.69%
27123031802	31802	2435	4205	57.91%
27123031900	31900	1140	1670	68.26%
27123032000	32000	1275	2395	53.24%
27123032100	32100	1540	2315	66.52%
27123032200	32200	1525	2760	55.25%
27123032400	32400	1855	2435	76.18%
27123032500	32500	3045	4015	75.84%
27123032600	32600	1995	2665	74.86%
27123032700	32700	2070	2515	82.31%
27123033000	33000	1375	1765	77.90%
27123033100	33100	1195	1765	67.71%
27123033200	33200	1290	2260	57.08%
27123033400	33400	1865	2495	74.75%
27123033500	33500	2440	3030	80.53%
27123033600	33600	1400	1580	88.61%
27123033700	33700	1255	1565	80.19%
27123033800	33800	1150	1675	68.66%
27123033900	33900	795	1480	53.72%

CITY OF SAINT PAUL, MINNESOTA CDBG Eligible Census Tracts - 2022				
Geo ID	Census Tract	Low-Income Population in Tract	Total Population in Tract	% Low-Income
27123034000	34000	720	1375	52.36%
27123034201	34201	1100	1815	60.61%
27123034202	34202	2190	4140	52.90%
27123034400	34400	1070	1700	62.94%
27123034500	34500	3110	4400	70.68%
27123034601	34601	2920	4155	70.28%
27123034602	34602	2420	3795	63.77%
27123034701	34701	2095	3465	60.46%
27123034702	34702	2290	3775	60.66%
27123035900	35900	610	1005	60.70%
27123036100	36100	1415	1610	87.89%
27123036800	36800	1350	2105	64.13%
27123037100	37100	2440	4405	55.39%
27123037200	37200	4450	6450	68.99%
27123037403	37403	3530	6325	55.81%
27123037602	37602	3605	5000	72.10%
27123042800	42800	1925	2080	92.55%



Percent Minority Population per Census Tract

February 2022



CITY OF SAINT PAUL, MINNESOTA			
Census Tracts with Minority Concentration			
Geo ID	Census Tract	% Minority	% Low-Income
27123030100	30100	24.70%	42.84%
27123030201	30201	18.60%	38.28%
27123030202	30202	32.60%	59.87%
27123030300	30300	20.60%	31.51%
27123030400	30400	67.60%	60.02%
27123030500	30500	84.30%	83.01%
27123030601	30601	85.40%	75.02%
27123030602	30602	56.20%	39.89%
27123030702	30702	61.20%	50.00%
27123030703	30703	70.50%	66.06%
27123030704	30704	76.30%	57.23%
27123030800	30800	72.60%	69.86%
27123030900	30900	76.00%	67.30%
27123031000	31000	76.90%	74.29%
27123031100	31100	60.40%	59.70%
27123031200	31200	42.40%	54.16%
27123031300	31300	77.00%	82.18%
27123031400	31400	75.20%	82.56%
27123031500	31500	82.40%	88.55%
27123031600	31600	79.90%	85.31%
27123031701	31701	77.80%	50.26%
27123031702	31702	84.00%	81.70%
27123031801	31801	73.20%	68.69%
27123031802	31802	57.60%	57.91%
27123031900	31900	50.00%	68.26%
27123032000	32000	34.30%	53.24%
27123032100	32100	41.30%	66.52%
27123032200	32200	31.90%	55.25%
27123032300	32300	38.30%	45.58%
27123032400	32400	70.80%	76.18%
27123032500	32500	76.60%	75.84%
27123032600	32600	85.00%	74.86%
27123032700	32700	85.80%	82.31%
27123033000	33000	76.70%	77.90%
27123033100	33100	63.30%	67.71%
27123033200	33200	39.20%	57.08%
27123033300	33300	22.60%	42.51%
27123033400	33400	50.00%	74.75%
27123033500	33500	81.50%	80.53%

CITY OF SAINT PAUL, MINNESOTA			
Census Tracts with Minority Concentration			
Geo ID	Census Tract	% Minority	% Low-Income
27123033600	33600	95.60%	88.61%
27123033700	33700	83.10%	80.19%
27123033800	33800	52.80%	68.66%
27123033900	33900	53.50%	53.72%
27123034000	34000	31.30%	52.36%
27123034201	34201	31.30%	60.61%
27123034203	34203	36.50%	52.90%
27123034204	34204	39.60%	52.90%
27123034400	34400	57.00%	62.94%
27123034500	34500	69.40%	70.68%
27123034601	34601	68.70%	70.28%
27123034602	34602	75.20%	63.77%
27123034701	34701	71.50%	60.46%
27123034702	34702	66.30%	60.66%
27123034900	34900	13.50%	42.80%
27123035000	35000	14.30%	34.50%
27123035100	35100	24.20%	37.50%
27123035200	35200	16.30%	34.05%
27123035300	35300	22.70%	36.06%
27123035500	35500	18.30%	44.39%
27123035700	35700	15.10%	21.99%
27123035800	35800	15.80%	42.93%
27123035900	35900	37.80%	60.70%
27123036000	36000	31.60%	43.82%
27123036100	36100	83.70%	87.89%
27123036300	36300	15.30%	19.24%
27123036400	36400	15.50%	25.42%
27123036500	36500	16.30%	36.99%
27123036600	36600	14.40%	36.14%
27123036700	36700	24.40%	41.13%
27123036800	36800	26.70%	64.13%
27123036900	36900	28.20%	45.93%
27123037000	37000	32.20%	46.31%
27123037100	37100	51.50%	55.39%
27123037200	37200	62.30%	68.99%
27123037402	37402	59.30%	49.94%
27123037403	37403	63.30%	55.81%
27123037500	37500	24.70%	29.99%
27123037601	37601	23.10%	33.78%

CITY OF SAINT PAUL, MINNESOTA			
Census Tracts with Minority Concentration			
Geo ID	Census Tract	% Minority	% Low-Income
27123037603	37603	69.70%	72.10%
27123037604	37604	43.30%	72.10%
27123042800	42800	83.30%	92.55%
27123042900	42900	26.00%	41.51%
27123043001	43001	13.60%	22.25%
27123043002	43002	14.80%	22.25%
27123980000	980000	<Null>	0.00%

SF-424s, Certifications and Assurances
(PENDING)



SAINT PAUL
MINNESOTA

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.

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 effect on housing choice for all protected classes.

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

Arc Minnesota, The – promotes and protects the human rights of people with intellectual and development disabilities and includes housing stabilization services.

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.

CAHS - Coordinated Access to Housing and Shelter - the process that conducts intake assessments to determine the most appropriate referral for homeless families seeking emergency shelter.

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.

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.

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.

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.

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

Family – as defined by the City of Saint Paul Zoning Code – changes “Family” to “Household” and is now defined as six (6) or fewer adults and minor children in their care living together in a dwelling unit.

FHPAP – Family Homeless Prevention and Assistance Program – 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.

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.

HHR – Heading Home Ramsey - the Continuum of Care for Ramsey County, a community-wide partnership committed to the goal of ending homelessness in the cities and neighborhoods of Ramsey County. It is a coalition of social service providers, housing providers, philanthropic partners, business, community, government, and citizens working

together to create and implement cost effective solutions to ending homelessness. HHR is responsible for planning and implementing the homeless response system in Ramsey County and carrying out specific duties defined by HUD and the State of Minnesota.

HHR Community Measures – 7 priority measures to evaluate the state of homelessness and identify unmet needs within Ramsey County.

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).

HOME Program – HOME Investment Partnerships - provides formula funding, from HUD to the City of Saint Paul, for a wide range of affordable housing activities for low-income households 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.

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.

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.

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

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.

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.

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 and condominiums. Multifamily units are generally attached and share a common lot.

Housing type should not be confused with ownership; multifamily units may be owner-occupied or renter-occupied.

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.

PHAS – Public Housing Assessment System – the system that HUD uses to assess a PHA's performance in managing its low-rent public housing programs.

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.

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.

RHSP – Returning Home Saint Paul – a program designed to help reduce barriers to successfully housing residents returning to the community from incarceration. This program serves residents by providing them with community based wraparound support.

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.

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.

Section 811 Supportive Housing – HUD funding to develop and subsidize rental housing with the availability of supportive services for very low- and extremely low-income adults with disabilities.

SEMAP – Section 8 Management Assessment Program - measures the performance of PHAs that administer the HCV program in 14 key areas and helps HUD target monitoring and assistance to PHA programs that need the most improvement.

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.

Street Outreach - programs that provide essential services to unsheltered individuals and families on the street, in parks, abandoned buildings, bus/transit stations, campgrounds,

and other unsheltered settings. Services can include engagement, case management, emergency health services/mental health services, transportation, or services tailored to address the needs of a specific population such as youth, victims of domestic violence, those affected by sex trafficking, veterans, and people living with HIV/AIDS.

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.

WIB – Workforce Investment Board - one of 16 legislatively mandated Workforce Boards in Minnesota. Working in partnership with the City of Saint Paul, the WIB harnesses the power of business, government, economic development, education, and the community to develop strategic solutions that address employer and job seeker needs.