

# Consolidated Annual Performance and Evaluation Report (CAPER)

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PROGRAM YEAR 2023: JUNE 1, 2023 – MAY 31, 2024

City of Saint Paul, Minnesota  
1100 CITY HALL ANNEX | 425 WEST FOURTH STREET |  
SAINT PAUL | MINNESOTA | 55102

SAINT  
PAUL



# CITY OF SAINT PAUL, MINNESOTA

## CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT

(CAPER)

FOR PROGRAM YEAR 2023 - 2024

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

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

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

This report summarizes to the U.S. Department of Housing and Urban Development (HUD) how the City of Saint Paul (City) invested and leveraged HUD funds from June 1, 2023 through May 31, 2024 (PY2023). The City uses HUD funded Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) and Emergency Solutions Grant (ESG) programs mostly for housing related activities, including rehabilitation and development of single family and multi-unit housing, and homelessness prevention and shelter services. To complement the housing effort, CDBG funds are also used for public service activities, public improvement projects, and activities promoting economic development.

Through it's annual entitlement allocations and program income utilized for Program Year 2023 (totalling \$10,684,373), overall the City of Saint Paul had a productive year, though projects were still facing delays and rising costs with continued high inflation.

In addition to entitlement allocations, the City continues to work through funds received through the Corona, Aid, Relief, and Economic Security Act (CARES Act) with additional funds in 2020 in two separate allocations: CDBG–CV of \$6,061,828 and ESG-CV of \$7,992,924 . CDBG-CV funds were committed to various public facilities and public services, including emergency rental assistance navigators, housing stabilization, meal support, career labs, family distance learning programs and low and no contact library services.

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

CDBG funded community engagement through 10 neighborhood District Councils (DCs) that represent LMI residents in LMAs. DCs are

neighborhood-based non-profit organizations that serve as liaisons between residents and the City, engaging residents on issues directly affecting DC residents, such as residential and commercial development.

The City is challenged to effectively address community development priorities, goals and strategies with HUD resources. This was worsened with the COVID-19 pandemic directly affecting the City’s residents and community development needs and inflation and other economic conditions continuing to drive up costs.

The City continues to expand economic opportunities, preserve and create affordable housing, address the needs of those experiencing homelessness or are at-risk of homelessness, provide accessible public services for vulnerable populations, affirmatively further fair housing, and leverage its HUD funding to make significant, sustainable change in the community.

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

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Community Engagement	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	906500	753800	83.15%	181300	202135	111.49%
Development of New	Affordable Housing	CDBG: \$ / HOME:	Rental units constructed	Household Housing	75	26	34.67%	0	0	0.00%

Housing		\$		Unit						
Development of New Housing	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Added	Household Housing Unit	0	8		6	0	0.00%
Economic Development	Non-Housing Community Development	CDBG: \$	Facade treatment/business building rehabilitation	Business	15	24	160.00%	3	4	133.00%
Economic Development	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	25	33	132.00%	5	4	80.00%
Economic Development	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	10	22	220.00%	2	3	150.00%
Homeless Prevention	Homeless	ESG: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	625	150	24.00%	125	108	86.40%
Homeless Prevention	Homeless	ESG: \$	Homeless Person Overnight Shelter	Persons Assisted	15000	5559	37.06%	3000	1122	37.40%
Homeless Prevention	Homeless	ESG: \$	Homelessness Prevention	Persons Assisted	2000	607	30.35%	400	400	75
Homeowner Housing Rehabilitation	Affordable Housing	CDBG: \$	Homeowner Housing Added	Household Housing Unit	0	3				
Homeowner Housing	Affordable	CDBG: \$	Homeowner Housing	Household Housing	255	389	152.55%	48	95	198.00%



Rehabilitation	Housing		Rehabilitated	Unit						
Public Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	35625	72935	204.73%	227410	0	0.00%
Public Services	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	15000	19504	130.03%	3000	3968	123.00%
Remediation of Substandard Properties	Non-Housing Community Development	CDBG: \$	Buildings Demolished	Buildings	85	20	23.53%	17	5	29.00%
Rental Housing Rehabilitation	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	130	322	247.69%	62	6	10.00%
Youth Employment	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1290	915	70.93%	258	224	86.82%

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

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

Creation of affordable housing through construction or rehabilitation and the preservation of existing affordable housing are the highest priorities for City investment of CDBG and HOME funds. As shown in Table 1, the City met many of the 2023 Annual Action Plan goals for the program year, however, the after effects of the Coronavirus pandemic (COVID-19) and current economic conditions have delayed starting or completing projects, particularly related to new construction and rehabilitation of housing units.

The City and its community partners provided loans to make necessary health and safety improvements to 95 single family, LMI owner-occupied homes. Construction is completed and lease up now complete, though not done by end of program year on one HOME new construction project, Striker Senior Housing with 57 total units (10 HOME-assisted). In addition, three other HOME new construction multifamily projects are underway, with a total of 210 units (26 HOME-assisted). The City also provided funding for the acquisition and demolition of five blighted buildings.

Another priority in the City's 2020-24 Consolidated Plan is Economic Development. There were nine businesses serving low/mod areas which received funding for code and façade improvements two of which are still in progress. Three LMI jobs were created or retained from current and previous years' assisted businesses, and 5 additional LMI job projects are in the process of hiring.

The City also utilized CDBG funding during the 2023 program year to assist several agencies to provide public services. These programs either provided services to areas of the City which are comprised of at least 51% LMI households or provided direct services to LMI persons. The following public service activities were assisted during the program year: Community Engagement, Block Nurse Program, Youth Employment, Domestic Intervention, and housing related legal services for LMI residents.

As part of its application and funding approval process, HUD requires the City to certify that at least 70% of CDBG project funds expended will principally benefit LMI persons. The City may select a one-, two-, or three-year period for this certification; the City has selected a 3-year period. 2023 is the 1<sup>st</sup> year and the City has expended 97.94% of its allocation on activities benefitting LMI households. The remaining funds were allocated for activities which eliminated slum and blight conditions.

The City received \$6,061,828 in CDBG-CV funding. Funding allocated by program year end included funding expanded meal access, expanded legal services, public facilities improvements, Saint Paul Public Library career labs and library materials lockers and mobile library services. One public facility project and one public services project are expected to be completed in next program year.

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

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

91.520(a)

	CDBG	HOME
White	2,423	0
Black or African American	914	0
Asian	478	0
American Indian or American Native	20	0
Native Hawaiian or Other Pacific Islander	31	0
<b>Total</b>	<b>3,866</b>	<b>0</b>
Hispanic	268	0
Not Hispanic	3,598	0

Describe the clients assisted (including the racial and/or ethnicity of clients assisted with ESG)

	HESG
American Indian, Alaska Native, or Indigenous	71
Asian or Asian American	71
Black, African American, or African	752
Hispanic/Latina/e/o	90
Middle Eastern or North African	0
Native Hawaiian or Pacific Islander	4
White	214
Multiracial	0
Client doesn't know	0
Client prefers not to answer	0
Data not collected	0
<b>Total</b>	<b>1112</b>

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

### Narrative

For the program year, 101 households were assisted through CDBG funded housing activities. For these households: 46 were white, 15 were Black/African American, 31 were Asian, and 11 identified as a

mixed-race household, 11 households identified as Hispanic, and 30 were female-headed households. Totals for all CDBG funded activities are in the table above.

The City assisted 1,369 persons with ESG program funding. Of those served, 214 were white, 752 were Black/African American, 71 were Asian, 71 were American Indian/Native American, 4 were Native Hawaiian/Other Pacific Islander, 232 were multiple races, and 25 declined to comment/did not know or data was not collected. Of these, 90 identified as Hispanic/Latino.

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

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	7,600,000	\$ 13,437,918
HOME	public - federal	2,496,636	\$ 1,832,353
ESG	public - federal	587,737	\$ 530,048

**Table 3 - Resources Made Available**

### Narrative

The City had \$6,727,557 in CDBG entitlement funds and \$643,104 in program income available to fund activities in the 2023 program year. The City also had on hand CDBG funds that had been allocated during prior program years, including CDBG-CV. The total expended for activities, administration and planning was \$13,437,918, of which \$5,398,827 was expended for CDBG-CV.

The City had \$1,902,401 in current program year HOME entitlement funds, \$594,595 in program income available for activities in the 2023 program year. The City expended HOME funds that had been allocated during prior program years. The City expended a total of \$1,832,353 during the program year. Funding was used to pay for eligible expenses directly associated with administration of the HOME program and reimbursement for HOME eligible project-related expenses for one multi-family new construction rental properties. All funding reported as expended reflects only draws from the City's Treasury account completed during the program year, June 1, 2023 through May 31, 2024. All program income funding contributions are evaluated on a slightly different time period to allow for pooling ahead of the program year, as such program income is evaluated on a March 16 – March 15 time frame. Remaining funds will be carried over into program year 2024 and expended on projects currently under construction and those implemented in the new program year.

The City was awarded \$6,789,929 in HOME-ARP funds. The City's HOME-ARP plan was approved by HUD in May 2023. No expenditures were made for the HOME-ARP program during the program year.

The City was awarded \$587,737 in ESG funding in PY2023. The City expended \$530,048 during the program year.

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

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

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

**Narrative**

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

## Leveraging

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

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

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

The City's dedication to preserving healthy, affordable housing for the well-being and stability of all residents and the community is partly achieved through the 4(d) Affordable Housing Incentive Program. The City offered a property tax incentive and small cash grant for rental property owners to preserve affordability. In the last program year, 67 properties were enrolled including 778 total units; 37 at 50% AMI and 741 at 60% AMI. In total, the City has enrolled 441 properties including 3,951 units; with 3,031 at 60% AMI and 920 at 50% AMI since the program started in 2019.

In addition, the City continues its rental rehab program offering 0% interest loans to landlords for repairs to rental buildings provided they maintain rents affordable at 60% AMI.

The City disposed of several publicly-held parcels during the program year, of these, 2 parcels were sold to the developer of the Phalen Village Apartments (an affordable multifamily development with 76 total units, 9 HOME assisted), and additional three parcels to Dayton's Bluff Neighborhood Housing Services for affordable single family construction activities, and another to the Rondo Community Land Trust for development of apartments.

The City leverages its ESG funds through allocations to organizations that work collaboratively with Ramsey County Continuum of Care (CoC)-funded activities. ESG requires a dollar-for-dollar match, which was met by its subgrantees in the amount of \$530,048 for PY23, in the following ways:

- State Government funds

- Private funds
- Program Income

HUD requires all participating jurisdictions match HOME program funding spent with 25% non-federal funds. No match was earned during the program year and is summarized in Tables below.

The City ended the 2023 program year with \$1,040,166 in excess match. No additional match was earned from HOME-assisted developments.

<b>Fiscal Year Summary – HOME Match</b>	
1. Excess match from prior Federal fiscal year	1,049,541
2. Match contributed during current Federal fiscal year	0
3 .Total match available for current Federal fiscal year (Line 1 plus Line 2)	1,049,541
4. Match liability for current Federal fiscal year	9,375
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	1,040,166

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



<b>Match Contribution for the Federal Fiscal Year</b>								
<b>Project No. or Other ID</b>	<b>Date of Contribution</b>	<b>Cash (non-Federal sources)</b>	<b>Foregone Taxes, Fees, Charges</b>	<b>Appraised Land/Real Property</b>	<b>Required Infrastructure</b>	<b>Site Preparation, Construction Materials, Donated labor</b>	<b>Bond Financing</b>	<b>Total Match</b>
0	0	0	0	0	0	0	0	0

**Table 6 – Match Contribution for the Federal Fiscal Year**

**HOME MBE/WBE report**

<b>Program Income – Enter the program amounts for the reporting period</b>				
<b>Balance on hand at begin-ning of reporting period \$</b>	<b>Amount received during reporting period \$</b>	<b>Total amount expended during reporting period \$</b>	<b>Amount expended for TBRA \$</b>	<b>Balance on hand at end of reporting period \$</b>
\$ 765,775.54	\$ 3,356.60	\$17,109.05		\$752,023.09

**Table 7 – Program Income**

<b>Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period</b>						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
<b>Contracts</b>						
Number	3					3
Dollar Amount	\$3,765,664.66					\$3,765,664.66
<b>Sub-Contracts</b>						
Number	102	5	4	4	3	86
Dollar Amount	\$12,179,685.98	\$480,665.96	\$226,829.02	\$1,078,741.69	\$70,605.75	\$10,322,843.56
	Total	Women Business Enterprises		Male		
<b>Contracts</b>						
Number	3	1	2			
Dollar Amount	\$3,765,664.66	\$ 726,169.08	3,039,495.58			
<b>Sub-Contracts</b>						
Number	167	35	132			
Dollar Amount	\$18,221,785.85	4,112,704.52	14,109,081.33			

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

<b>Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted</b>						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	4					4
Dollar Amount	\$6,150,000					\$6,150,000

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

<b>Relocation and Real Property Acquisition</b> – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		4	\$2,300,000			
Businesses Displaced						
Nonprofit Organizations Displaced						
Households Temporarily Relocated, not Displaced						
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number						
Cost						

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

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

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	98	101
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>98</b>	<b>101</b>

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	21	0
Number of households supported through Rehab of Existing Units	77	101
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>98</b>	<b>101</b>

Table 12 – Number of Households Supported

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

This program year, no HOME units were completed. Construction was completed and units leased up after end of program year on a 57-unit new construction HOME-assisted development that was funded in PY20 of which 10 units are HOME-assisted. Three additional new construction multifamily HOME developments are now underway, totalling 210 units (26 HOME-assisted).

The major obstacle in meeting goals continues to be the lack of sufficient funds. With rising construction costs, production of new housing and rehabilitation of existing affordable units requires a substantial subsidy. The City must partner with other government agencies and various foundations to sufficiently finance affordable housing development projects each year. Current economic conditions and inflation has also delayed completing projects and the pace for advancing new projects.

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

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

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

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	21	0
Low-income	32	0
Moderate-income	48	0
<b>Total</b>	<b>101</b>	<b>0</b>

**Table 13 – Number of Households Served**

**Narrative Information**

CDBG funded the rehabilitation of 101 owner-occupied housing units. 21 units are occupied by households at or below 30% AMI, 32 were occupied by households with incomes from 31% to 50% AMI, and 48 were occupied by households with income from 51% to 80% AMI. Of these, 30 were female-headed households.

The City funded and began construction in a prior year for a new affordable HOME-assisted rental development; a total of 57 units of which 10 are designated HOME units. Construction and lease-up will did not get completed in time for the end of the program year, but is not completed. Three other HOME assisted projects are underway.

**CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)**  
**Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:**

**Reaching out to Homeless Persons (especially unsheltered persons) and Assessing their Individual Needs**

The City and Ramsey County receive Emergency Solutions Grant (ESG) funding through direct allocations from U.S. Department of Housing and Urban Development (HUD). To administer the deployment of city ESG funds more efficiently, the city entered into a Joint Powers Agreement (JPA) with Ramsey County. Ramsey County, as the lead agency and collaborative applicant for the City of St Paul/ Ramsey County Continuum of Care (COC)- *Heading Home Ramsey*, administers the ESG funds; selects subrecipients and enters contracts to implement use of funds; processes subrecipient reimbursements; monitors subrecipient performance; manages HMIS data collection and required reporting to HUD and the City. The HHR ranking committee, made up of HHR steering committee members and individuals with lived experience, is tasked with decision-making on the select ESG projects and does this with consideration of the annual Point in Time count, Housing Inventory Chart, Systems Performance Measures and needs assessment.

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

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

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

Ramsey County's 2024 Point-In-Time Count on January 25, 2024, found 409 unsheltered households, of which 393 were Adult Only households. 48% of these unsheltered households identified as Black or African American compared to just 13% of the county population; 4% identified as American Indian or Indigenous compared to only 1% of the county population; 4% identified as White compared to 60% of the county population. These measures are similar to Ramsey County's homeless population.

The CoC works in collaboration with Ramsey County and its outreach partners to gather information and make decisions on a case-by-case basis to ensure its efforts align with city principles and the Governor's Orders.

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

The rising number of encampments has led at times to friction with nearby neighbors and businesses. One response has been the implementation of the St. Paul Downtown Improvement District (SPDID), which encompasses Saint Paul's most prominent artistic, cultural and entertainment venues, along with theatres, restaurants and other attractions possessing unique needs. The district is managed by a governing board representing a cross-section of property owners throughout the boundaries. Since its launch in 2021, Saint Paul Downtown Improvement District has already proven itself effective and invaluable –data shows **police calls for quality of life crimes and concerns *fell by 40% within SPDID boundaries***, while they increased significantly in other parts of downtown. This includes a high visibility Street Team program which employs Ambassadors to not only help maintain clean and welcoming streets in the downtown area but also to assist individuals experiencing homelessness access services. The Street Team is part of St. Paul Safety Communications Center, which supports streamlined communications between the Street Team, downtown street outreach services, private building security teams and the Saint Paul Police department to ensure efficient and prompt responses to issues, emergencies and events occurring in the designated district. Ambassadors may also provide crime prevention information and are available seven days a week from 7am to 11pm.

The City of St. Paul created the Homeless Assistance Response Team (HART) in late 2021 to address an unprecedented rise in homeless encampments amid a regional crisis in affordable housing. The City of Saint Paul and surrounding region saw a significant rise in unsheltered residents and homeless encampments over the last several years. During the height of the COVID-19 pandemic between 2020 and 2021, encampment numbers reached historic levels. The goals of HART include the following:

- Provide a 24/7 response to those who are unsheltered or need immediate shelter supports.
- Learn more about individuals living in City encampments, in caves, or other outdoor spaces, to locate the right shelter environment to best fit each person's needs while recognizing their barriers.
- Transition as many individuals who are unsheltered to available shelter resources while thoughtfully closing encampment sites across the city.
- Continue working to decriminalize homelessness through identifying individual needs and connecting people to the medical, mental health and other services they need to help them transition out of the unsheltered environment.

## **Addressing the Emergency Shelter and Transitional Housing Needs of Homeless Persons**

Saint Paul responded to needs of homeless persons and unsheltered residents as follows:

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

The following emergency shelters were supported by ESG:

- The Salvation Army Booth Brown House Shelter for youth
- Lutheran Social Services Safe House Shelter for youth
- Catholic Charities Higher Ground Shelter for adults
- Breaking Free Shelter for adults and families fleeing domestic violence

The following Rapid Rehousing Services were supported by ESG:

- Theresa Living Center- medium term rental assistance and legal services including credit repair for single adult women and women with families.
- Face to Face- rental assistance for youth.

The following Homeless Prevention Services were supported by ESG:

- Breaking Free for individuals and families.
- American Indian Family Center for individuals and families.



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

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

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

Overall, the city and county worked with its community agency partners to fund programs that assist residents experiencing homelessness, including allocating Community Development Block Grant (CDBG) funds for the Ramsey County Family Emergency Shelter Team. Part of the Ramsey County Housing Stability Department, the Family Emergency Shelter Team provides a Rapid Stabilization program. The program addresses barriers that often prevent households, such as negative rental history, criminal background, financial literacy, family health concerns, or lack of employment or education. Through a suite of goal action planning tools, and trauma-informed interventions such as motivational interviewing, case managers support participants in identifying and working through key goals and action steps that turn challenges into opportunities.

In summary, during PY23, affordable housing and supportive services were provided within the City of Saint Paul to residents experiencing homelessness and residents needing supportive housing, including the elderly, frail elderly, persons with disabilities, persons with HIV/AIDS, persons with chemical dependency, and those with limited English-speaking proficiency. That said, more affordable housing and more affordable supportive housing are needed citywide. In response, the city continues to finance affordable housing developments, and the City of Saint Paul's Comprehensive Plan includes strategies to facilitate the development of affordable housing citywide.

**Helping homeless persons (especially chronically homeless individuals and families, families**

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

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

### **Homeless Adults**

- Catholic Charities Higher Ground Shelter for adults
- Breaking Free Shelter for adults and families fleeing domestic violence
- Breaking Free rental support for adults and youth fleeing domestic violence
- Theresa Living Center- medium term rental assistance and legal services including credit repair for single adult women and women with families.

At the end of the COVID pandemic support, Ramsey County developed an innovative Emergency Rental Assistance-based program called Highway to Housing (H2H). Partnering with local hotels and a shelter with non-congregate rooms, H2H made available 80 rooms for single men, women and couples experiencing homelessness. H2H supports housing-ready people from congregate shelters or encampments, by providing individual rooms with intensive housing search supports. H2H's goal is to successfully locate 80% of households into housing; with households spending no more than 60 days in the program before entering permanent housing. By its completion in May of 2023, chronically individuals with the greatest barriers were placed into Permanent Supportive Housing (PSH).

In July of 2023, the Ramsey County Housing Stability Department received \$2.2m in funding from the Office of Economic Opportunity, which has been dedicated toward the provision of warming centers and Single Point of Entry program. For the 2023 winter season, Ramsey County HSD expanded its capacity of winter warming spaces, along with the provision of shuttle service between mid-November 2023 and mid-March 2024. Services were aimed toward people experiencing unsheltered homelessness, many of whom have diagnosed or undiagnosed mental health disorders. This included administering the concept of a low barrier model, which aided in providing warming spaces to more individuals, as well as preventing life-threatening emergencies from extreme cold or through the hazards of outside encampments.

**The Single Point of Entry opened in April of 2023 and is available** for those seeking emergency shelter, to offer diversion and shelter reservation services. The Ramsey County Shelter Entry & Diversion team provides a single point of contact and navigation to the best available resources for anyone experiencing homelessness in Ramsey County; shelter reservations for single adults for the

coming night; and diversion services to help single adults identify other resources that could help avoid the need for emergency shelter.

### **Homeless Families**

Homeless families were assisted with transitional RRH programs through: Face to Face and Theresa Living Center. Catholic Charities Family Service Center Shelter for families

- Breaking Free Shelter for adults and families fleeing domestic violence
- Theresa Living Center- medium term rental assistance and legal services including credit repair for single adult women and women with families.

### **Homeless Youth**

- Breaking Free rental support for adults and youth fleeing domestic violence
- Face to Face- rental assistance for youth

### **Affordable Housing**

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

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

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

**Public Housing and Project-Based Rental Assistance (PBRA):** Saint Paul Public Housing Agency (PHA) is an important provider of affordable housing for thousands of Saint Paul households with the greatest need (households at or below 30% of AMI). PHA owns and manages 418 public housing units and 3,836 units with Project-Based Rental Assistance (PBRA). PHA also currently administers 5,163 Housing Choice Vouchers (HCVs). In total, PHA provides over 9,400 affordable homes to more than 22,000 people.

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

**Waiting Lists** –The Multifamily waiting list closed 9/28/2021, and opened 3/1/2023. The Public Housing waiting list opened 4/21/2022 and closed 6/20/2022. There remain 5,490 applicants on the Multifamily/PBRA waiting list for apartments in hi-rises and family townhome developments. The public housing waiting list (4,020 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.

The Annual Agency Plan for federal FY 2024 (PHA's Fiscal Year 2023, beginning April 1, 2023), Five-Year Capital Fund Plan, and Annual Report are posted at <https://www.stpha.org/>.

**Public Housing** – PHA has maintained its High Performer status under HUD's Public Housing Assessment System for 32 consecutive years. PHA does not administer HOPE VI activities or Mixed-Finance Modernization and Development. PHA has also maintained its High Performer status under HUD's Section 8 Management Assessment Program (SEMAP) for 20 consecutive years. PHA successfully implements and administers current agreements for Project-Based Vouchers (PBV); including PBV(s) in supportive housing that assists the State, Ramsey County, and the City with their plans to end homelessness.

**Rental Assistance Demonstration Conversion (RAD)** – Effective January 1, 2022, most public housing units converted, debt-free, to HUD's Project-Based Rental Assistance (PBRA) program via HUD's RAD program. The conversion does not constitute privatization of public housing; PHA continues to own, manage, maintain and improve those former public housing units through long-term PBRA contracts.

The initial 20-year contracts, by law, must be renewed; this ensures the units remain permanently affordable to low-income households. Residents continue to pay 30 percent of income towards rent and retain the same basic rights as living in PHA owned housing. The primary benefit is more predictable, reliable funding. PHA continues to refine its operational model for PBRAs for the 3,836 affordable housing units that were previously funded as public housing.

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

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

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

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

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

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

The PHA also participates in the Family Self-Sufficiency program (FSS) which 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.

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

**Not applicable.** PHA has maintained its High Performer status under HUD's Public Housing Assessment System for 32 consecutive years and its High Performer status under HUD's Section 8 Management Assessment Program (SEMAP) for 20 consecutive years.

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

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

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

In PY23 the City had approximately 12,228 publicly assisted affordable housing units; 418 public housing units, 3,836 PBRA units, and 5,243 Housing Choice vouchers (HCV). Roughly 36% of City renters receive some housing assistance, yet over 50% of renters in Saint Paul are cost burdened and more than 25% of renters are severely cost burdened. The City has identified the most significant barriers to affordable housing: 1) Housing costs which continue to rise coupled with an insufficient number of housing units for all income levels and 2) median household incomes and wages not keeping pace with housing cost, especially for households with incomes at or below 50% AMI and for people of color.

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

**Lack of Sufficient Funding for Publicly-Assisted Housing** - The lack of sufficient federal funding and LIHTC are the most substantial barriers for developing affordable housing. In general, the City continually receives less CDBG and HOME program funding. It is expected this trend will continue or remain steady; a similar trend is likely for LIHTCs.

**Zoning Code** – On October 18, 2023, the Saint Paul City Council approved landmark changes in the zoning code to expand housing opportunities in the city. The comprehensive updates to the zoning code approved by the City Council provide for greater housing density, accessibility, and affordability incentives while nurturing a diverse and sustainable community. The new zoning amendments will now allow neighborhood-scale housing, such as duplexes, triplexes, fourplexes, accessory dwelling units (ADUs), townhomes, and cluster developments, to be built in every part of the city. The City is working with a non-profit developer to build 5 affordable single family units that include an ADU; the Sustainable Building Regulations Ordinance established sustainable building regulations for buildings owned, operated or funded by the City ensuring energy efficiency and sustainability and thus lower costs for building owners and ultimately tenants; changed definition of Family to Household and from 4 unrelated adults and their children to 6 unrelated adults and their children.

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

During PY23 the City/HRA provided funding to 26 prospective homebuyers and 35 low income homeowners to bring their property up to current property standards and preserve homeownership

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

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

Affordable rental housing and affordable homeownership remain underserved needs. During PY23, the City and its subrecipients addressed many underserved needs through its ongoing, multi-year HUD funded housing programs using CDBG, HOME, state and local funds, and LIHTC. Funds were used for programs to develop affordable rental and home-ownership units. The City's homeownership programs (home-improvement deferred loans, Mortgage Foreclosure Prevention Program, and affordable production program) stabilized households. The City participated with the Minnesota Home Ownership Center's (MNHOC) Home Ownership Opportunity Alliance to develop strategies to decrease the disparities in homeownership and increase homeownership within communities of color.

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

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

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

The problem of lead-based paint (LBP) hazards remains a major concern for the City due to the large



number of older housing units. The City continued to comply with all LBP regulations. The City provided information on LBP hazards to households utilizing federal funds for housing activities, i.e. purchasing a home or receiving housing rehabilitation services, during the 2023 program year. All City housing programs include adequate funding to address LBP, and the City works in conjunction with health officials and other agencies to address the issue. The City has documentation requirements of Lead Certified contractors to ensure all employees are aware of and complying with lead safe work practices.

The City also continued 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 owneroccupied housing and rental property owners.

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

During PY23, the City partnered with youth workforce activities and other related public service activities which complement programs provided by Ramsey County, the primary social service provider in Saint Paul. Workforce activities included outreach, basic skills and job training, job placement, and follow-up employment services.

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

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

businesses to help them access capital.

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

The City of Saint Paul launched the People's Prosperity Pilot in 2020 during the height of the COVID-19 pandemic. It was the second-ever mayor-led guaranteed income pilot, and the first to use funding from the CARES Act, along with state and private philanthropic dollars. In a [study](#) published in December 2023, results show positive trends in employment, physical and mental health, and other indicators of well-being and quality of life.

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

Saint Paul's institutional structure created opportunities for the City to partner with many organizations. During PY23, the City collaborated with other government partners - Federal, State, and County, non-profit organizations, and housing developers to implement housing, economic development, and community development activities.

In 2023 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.

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 partnered in the Fair Housing Implementation Council (FHIC) and developed responsive strategies to Affirmatively Further Fair Housing within the Twin Cities. There remains a sustained focus across Mayoral administrations to address racial inequities. OFE has Annual Action Plan and 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 impacts.

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

During PY23, Saint Paul encouraged the coordination between social service agencies and housing providers. Ramsey County is the primary funding source for social services for Saint Paul residents. The Saint Paul Public Housing Agency (PHA) is the primary housing provider for households at or below 30% AMI.

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

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

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.

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

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

During PY23, the City used its housing policy and housing practices to develop actions to affirmatively further fair housing (AFFH).

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

housing costs rising faster than average incomes, and significant disparities in homeownership.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The City's Grants Management division of the Planning and Economic Development (PED) department served as the City's overall grant administrator ensuring compliance with all pertinent CDBG, HOME, and ESG program regulations and requirements. In PY23, the City utilized an outside consultant to assist with monitoring its CDBG subgrantees, and to ensure that HOME-assisted units met rent, occupancy, income, and property standards requirements of the HOME program through the property's affordability period. The City's outside consultant also provides on-going compliance training for property managers and owners of properties it monitors.

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

Compliance monitoring consisted of:

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

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

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

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

The City published a legal notice on August 5, 2024, in the *The Pioneer Press*, Saint Paul City Council's designated legal newspaper of general circulation, advertising the availability of the draft PY23 CAPER, providing notice of the 15-day comment period, and notice of public hearing. The public hearing will be held via Teams on August 15, 2024, at 4:00 p.m. and also simultaneously in-person at 25 West 4th Street Suite 1300, Saint Paul, MN to accommodate a variety of members of the public. Members of the public are also able to provide public comment on the City's CAPER by calling the numbers listed in the public notice, via e-mail, or U.S. Postal Service mail. A hard copy of the draft CAPER was made available at the Saint Paul Public Library Bookmobile and posters were prominently displayed at all Saint Paul public libraries and the bookmobile inviting City residents to provide public comment. Each library and the bookmobile were provided with instructions for residents to access the draft CAPER on the City's website.

All public comments received or post-marked by the end of the public comment period, August 20, 2024, were considered.

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

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

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

Publish date: August, 5, 2024

Public Hearing date: August 15, 2024

Public comment period: August 5 - August 20, 2024

**Comments will be recorded here received from the hearing or other modalities.**

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

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

The economic recovery following the COVID-19 pandemic and resultant inflations continued to impact all aspects of programming during PY23. Costs continue to be higher and delays in materials significant compared to pre-pandemic times.

The City received a total of \$6,061,828, in two separate allocations, of CDBG-CV funding under the CARES Act. As the activities funded with CDBG-CV closed out and continue to phase out, any unused funds were reallocated to additional activities to prevent, prepare for, or respond to coronavirus. All reallocations complied with our Citizen Participation process.

During the program year, the City made few substantial amendments to Action Plans. One amendment to the 2023 plan was made to move funding from public services to public facilities, a second was made to move funding from acquisition to rehabilitation activities for housing. Another substantial amendment was to add a Neighborhood Revitalization Strategy Area for Railroad Island community and adjacent Hamm's redevelopment area.

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

No

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

## **CR-50 - HOME 24 CFR 91.520(d)**

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

Please list those projects that should have been inspected on-site this program year based upon the schedule in 24 CFR §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

During the 2023 program year the City utilized an outside consultant, Affordable Housing Connections, Inc. (AHC), to monitor its HOME-assisted units ensuring all units met rent, occupancy, income, and property standards requirements of the HOME program through the property's affordability period. See the attached Summary Report provided by AHC, Attachment D.

AHC resumed in-person inspections for all HOME properties in Calendar 2023. A total 35 projects and 144 units were inspected using UPCS (2023) or NSPIRE (2024) standards. For properties that were not subject to physical inspection in this period, owners certified that the projects were in compliant with the ongoing property standards at 24 CFR 92.251(f). Property owners addressed deficiencies in a timely manner. As observed in the past couple of years, although it's getting better, we had a handful Owner/Owner Agents request extensions due to being short staffed, supplies delays and third-party contractor schedules that correct deficiencies after AHC's response deadlines.

A total of 42 annual reports and 158 tenant files were reviewed. Where applicable, all review concerns related to the tenant files and annual owner compliance reports have been clarified and/or resolved. None of the deficiencies adversely affected households' income eligibility. Instances of "Sufficient But Imperfect" (SBI) reporting and file documentation observed during the reviews have been communicated to the Owner/Owner Agent. SBI issues do not constitute instances of noncompliance unless reported to the Owner/Owner Agent as a pattern that must be corrected. The Owner/Owner Agent is expected to correct or improve procedures to ensure compliance in the future.

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

The projects listed below have uncorrected deficiencies as detailed on the monitoring report, and are continued to be in process to achieve resolution:

- IDIS 2334 | Parkway Apartments – Management did not respond to gross rent deficiencies on their files reviewed last year. AHC is following up with management to ensure that gross



- rent compliance is established and overpayments, if any, are reimbursed accordingly.
- IDIS 1938 | Prior Crossing - Management company and/or staffing changes may have affected timely correction of deficiencies. AHC is following up with management to ensure the necessary steps are taken to restore compliance.

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

**Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 24 CFR 91.520(e) and 24 CFR 92.351(a)**

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

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

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

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

Program income was aggregated through March 15, 2023, for use in program year 2023, in the amount of \$3,356.60. Program income received March 16, 2023 through March 15, 2024, will be aggregated and used for administrative and project costs in program year 2024.

**Describe other actions taken to foster and maintain affordable housing. 24 CFR 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 24 CFR 91.320(j)**

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

### CR-58 – Section 3

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

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	0	2	0	0	0
Total Labor Hours	0	52618.6			
Total Section 3 Worker Hours	0	12801.6			
Total Targeted Section 3 Worker Hours	0	6976			

**Table 14 – Total Labor Hours**

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	2	2			
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	2	2			
Direct, on-the job training (including apprenticeships).	2	2			
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.					
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).					
Outreach efforts to identify and secure bids from Section 3 business concerns.	9	9			
Technical assistance to help Section 3 business concerns understand and bid on contracts.	1	1			
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.					
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.					
Held one or more job fairs.					
Provided or connected residents with supportive services that can provide direct services or referrals.					
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.					
Assisted residents with finding child care.					
Assisted residents to apply for, or attend community college or a four year educational institution.					
Assisted residents to apply for, or attend vocational/technical training.					
Assisted residents to obtain financial literacy training and/or coaching.					
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.					
Provided or connected residents with training on computer use or online technologies.					
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.					
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.					
Other.					

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

## Narrative

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

For the 2023-2024 reporting period, the City of Saint Paul has two projects with over \$200,000 in HUD funding. These projects combine for a total of \$4,100,000 in HOME funds expended. There are no projects with CDBG funds for this reporting period. The total development cost or business opportunity of these projects are \$42,030,145.

For 2023-2024, we are proud to report that we have achieved a combined 39.8% of all workforce hours performed by Section 3 Workers and Targeted workers. We exceeded the 20% Section 3 Worker goal at 24.3% of all labor hours being with Section 3 Workers. We also exceeded the 5% Section 3 Targeted Worker Goal of 5%, in which we achieved 15.5%. Between the two active projects on this report, there are a combined 145 contractors/subcontractors/businesses, with 16 Section 3 certified businesses performing work which enables their workforce and labor hours to count towards each project. Both projects are nearing completion in the next couple of months, so we don't anticipate the numbers to deviate very much from the numbers reported here.

In 2023-24, we certified the following businesses and workers:

49	BUSINESS CERTIFICATIONS
142	WORKER CERTIFICATIONS
23	TARGETED WORKER CERTIFICATIONS

During this reporting period, the City of St. Paul has partnered up and engaged in 9 local and regional events/workshops sharing Section 3 contracting opportunities, Section 3 certifications, career/occupational training opportunities, project fairs/open houses, and other technical assistance with potential and current Section 3 Businesses, Workers, and Targeted Workers. In addition, the City of St. Paul has partnered with the MN Trades Academy/Construction Careers Foundation on 2 occasions to build capacity to train with local small, small minority-owned, small woman-owned, and Section 3 businesses, as well as train local job seekers (Section 3 Workers and Targeted Workers).

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

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

### For Paperwork Reduction Act

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

##### Basic Grant Information

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

##### ESG Contact Name

Prefix	Ms
First Name	Beth
Middle Name	A
Last Name	Hubler-Ulrich
Suffix	
Title	Grants Program Administrator

##### ESG Contact Address

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

##### ESG Secondary Contact

Prefix	Ms
First Name	Austria
Last Name	Castillo Zahar
Suffix	
Title	Grants Specialist
Phone Number	6512666691
Extension	

**Email Address**

austria.castillo@ci.stpaul.mn.us

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

**Program Year Start Date**

06/01/2023

**Program Year End Date**

05/31/2024

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

**Subrecipient or Contractor Name:** MODEL CITIES COMMUNITY DEVELOPMENT CORPORATION

**City:** Saint Paul

**State:** MN

**Zip Code:** 55104, 4808

**DUNS Number:**

**UEI:**

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

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

**ESG Subgrant or Contract Award Amount:** 60000

**Subrecipient or Contractor Name:** AMERICAN INDIAN FAMILY CENTER

**City:** ST. PAUL

**State:** MN

**Zip Code:** ,

**DUNS Number:**

**UEI:**

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

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

**ESG Subgrant or Contract Award Amount:** 37500

**Subrecipient or Contractor Name:** Face to Face Health & Counseling

**City:** St. Paul

**State:** MN

**Zip Code:** 55102,

**DUNS Number:** 030014575

**UEI:**

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

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

**ESG Subgrant or Contract Award Amount:** 61210

**Subrecipient or Contractor Name:** Lutheran Social Services of MN

**City:** St. Paul

**State:** MN

**Zip Code:** 55108,

**DUNS Number:** 079728721

**UEI:**

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

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

**ESG Subgrant or Contract Award Amount: 40000**

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

**City:** Saint Paul

**State:** MN

**Zip Code:** 55102, 1635

**DUNS Number:** 010354488

**UEI:**

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

**Subrecipient Organization Type:** Unit of Government

**ESG Subgrant or Contract Award Amount:** 4155

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

**City:** St. Paul

**State:** MN

**Zip Code:** ,

**DUNS Number:** 091721704

**UEI:**

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

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

**ESG Subgrant or Contract Award Amount:** 30000

**Subrecipient or Contractor Name:** Catholic Charities - St. Paul/Mpls Higher Ground/Dorothy Day

**City:** Minneapolis

**State:** MN

**Zip Code:** 55403, 2513

**DUNS Number:** 108504168

**UEI:**

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

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

**ESG Subgrant or Contract Award Amount:** 39787

**Subrecipient or Contractor Name:** Breaking Free

**City:** Saint Paul

**State:** MN

**Zip Code:** 55104, 4805

**DUNS Number:** 410962296

**UEI:**

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

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



**ESG Subgrant or Contract Award Amount: 34225**

**Subrecipient or Contractor Name:** Salvation Army

**City:** Saint Paul

**State:** MN

**Zip Code:** 55108, 2542

**DUNS Number:** 140698597

**UEI:**

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

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

**ESG Subgrant or Contract Award Amount: 22300**

**Subrecipient or Contractor Name:** People Incorporated

**City:** Saint Paul

**State:** HQ

**Zip Code:** 55120, 1271

**DUNS Number:** 07151136

**UEI:**

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

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

**ESG Subgrant or Contract Award Amount: 39856**

**Subrecipient or Contractor Name:** Minnesota Community Care

**City:** Saint Paul

**State:** MN

**Zip Code:** 55107, 2226

**DUNS Number:** 135938926

**UEI:**

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

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

**ESG Subgrant or Contract Award Amount: 28000**

**Subrecipient or Contractor Name:** Theresa Living Center

**City:** Saint Paul

**State:** MN

**Zip Code:** 55106, 2638

**DUNS Number:** 966111205

**UEI:**

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

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

**ESG Subgrant or Contract Award Amount: 44209**

**Subrecipient or Contractor Name:** Institute for Community Alliances (ICA)

**City:** Minneapolis

**State:** MN

**Zip Code:** 55404, 2157

**DUNS Number:** 046826826

**UEI:**

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

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

**ESG Subgrant or Contract Award Amount:** 14647

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

**City:** Saint Paul

**State:** MN

**Zip Code:** 55105, 1815

**DUNS Number:**

**UEI:**

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

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

**ESG Subgrant or Contract Award Amount:** 90000

## CR-65 - Persons Assisted

### 4. Persons Served

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

Number of Persons in Households	Total
Adults	46
Children	29
Don't Know/Refused/Other	0
Missing Information	0
<b>Total</b>	<b>75</b>

Table 16 – Household Information for Homeless Prevention Activities

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

Number of Persons in Households	Total
Adults	143
Children	131
Don't Know/Refused/Other	0
Missing Information	0
<b>Total</b>	<b>274</b>

Table 17 – Household Information for Rapid Re-Housing Activities

#### 4c. Complete for Shelter

Number of Persons in Households	Total
Adults	556
Children	563
Don't Know/Refused/Other	0
Missing Information	3
<b>Total</b>	<b>1,122</b>

Table 18 – Shelter Information

#### 4d. Street Outreach

Number of Persons in Households	Total
Adults	68
Children	0
Don't Know/Refused/Other	0
Missing Information	0
<b>Total</b>	<b>68</b>

Table 19 – Household Information for Street Outreach

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

Number of Persons in Households	Total
Adults	816
Children	720
Don't Know/Refused/Other	0
Missing Information	3
<b>Total</b>	<b>1,539</b>

Table 20 – Household Information for Persons Served with ESG

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

	Total
Male	648
Female	871
Transgender	7
Don't Know/Refused/Other	8
Missing Information	5
<b>Total</b>	<b>1,539</b>

Table 21 – Gender Information

## 6. Age—Complete for All Activities

	<b>Total</b>
Under 18	720
18-24	311
25 and over	505
Don't Know/Refused/Other	0
Missing Information	3
<b>Total</b>	<b>1,539</b>

Table 22 – Age Information

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

### Number of Persons in Households

<b>Subpopulation</b>	<b>Total</b>	<b>Total Persons Served – Prevention</b>	<b>Total Persons Served – RRH</b>	<b>Total Persons Served in Emergency Shelters</b>
Veterans	11	0	3	8
Victims of Domestic Violence	331	17	75	239
Elderly	15	2	3	10
HIV/AIDS	3	0	0	3
Chronically Homeless	219	0	18	201
<b>Persons with Disabilities:</b>				
Severely Mentally Ill	271	15	50	206
Chronic Substance Abuse	62	0	10	52
Other Disability	161	10	28	123
Total (Unduplicated if possible)	1,074	44	188	842

Table 23 – Special Population Served

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

### 10. Shelter Utilization

Number of New Units - Rehabbed	0
Number of New Units - Conversion	0
Total Number of bed-nights available	73,612
Total Number of bed-nights provided	73,612
Capacity Utilization	100.00%

Table 24 – Shelter Capacity

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

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

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

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

With additional support from Ramsey County and Saint Paul Foundation, the City continues Safe Space,

overnight shelter, open all year with extended hours and services. For longer-term supportive housing, four agencies provided Rapid Re-Housing (RRH): Theresa Living Center for homeless women and single-parent families; Women's Advocates for homeless domestic violence victims/survivors; YWCA for families and single adults; and Face to Face for homeless youth.

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

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

## CR-75 – Expenditures

### 11. Expenditures

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

	Dollar Amount of Expenditures in Program Year		
	2021	2022	2023
Expenditures for Rental Assistance	47,228	50,571	
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	0	
Expenditures for Housing Relocation & Stabilization Services - Services	5,000	0	
Expenditures for Homeless Prevention under Emergency Shelter Grants Program	0	0	
<b>Subtotal Homelessness Prevention</b>	<b>52,228</b>	<b>50,571</b>	

Table 16 – ESG Expenditures for Homelessness Prevention

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

	Dollar Amount of Expenditures in Program Year		
	2021	2022	2023
Expenditures for Rental Assistance	161,083	80,912	
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	3,265	22,233	
Expenditures for Housing Relocation & Stabilization Services - Services	0	16,604	
Expenditures for Homeless Assistance under Emergency Shelter Grants Program	0	0	
<b>Subtotal Rapid Re-Housing</b>	<b>164,348</b>	<b>119,749</b>	

Table 17 – ESG Expenditures for Rapid Re-Housing

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

	Dollar Amount of Expenditures in Program Year		
	2021	2022	2023
Essential Services	15,775	64,639	
Operations	258,357	241,030	
Renovation	0	0	
Major Rehab	0	0	
Conversion	0	0	
<b>Subtotal</b>	<b>274,132</b>	<b>305,669</b>	

Table 18 – ESG Expenditures for Emergency Shelter



**11d. Other Grant Expenditures**

	Dollar Amount of Expenditures in Program Year		
	2021	2022	2023
Street Outreach	71,601	22,930	
HMIS	11,888	11,757	
Administration	55,036	6,653	

**Table 19 - Other Grant Expenditures**

**11e. Total ESG Grant Funds**

Total ESG Funds Expended	2021	2022	2023
	629,233	517,329	

**Table 20 - Total ESG Funds Expended**

**11f. Match Source**

	2021	2022	2023
Other Non-ESG HUD Funds	0	0	
Other Federal Funds	0	0	
State Government	114,672	114,672	
Local Government	0	0	
Private Funds	271,997	271,997	
Other	45,000	45,000	
Fees	0	0	
Program Income	115,000	115,000	
<b>Total Match Amount</b>	<b>546,669</b>	<b>546,669</b>	

**Table 21 - Other Funds Expended on Eligible ESG Activities**

**11g. Total**

Total Amount of Funds Expended on ESG Activities	2021	2022	2023
	1,175,902	1,063,998	

**Table 22 - Total Amount of Funds Expended**

Attachment A

ESG Sage Report Forthcoming

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

### **CITY OF SAINT PAUL**

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

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

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

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

During program year 2023, the City used its housing policy and housing practices to determine whether its actions to affirmatively further fair housing expanded housing opportunities that promoted fair housing choice; worked with the Fair Housing Implementation Council (FHIC) to consider regional approaches to Fair Housing issues;

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

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

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

### **AFFORDABLE HOUSING**

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

Saint Paul Public Housing Agency (PHA) is an important provider of affordable housing for thousands of Saint Paul households with the greatest need (households at or below 30% of AMI). PHA owns and manages 418 public housing units and 3,836 units with Project-Based Rental Assistance (PBRA) that were converted from public housing via HUD's Rental Assistance Demonstration (RAD) effective January 1, 2020. PHA also currently administers 4,929 Housing Choice Vouchers (HCVs). In total, PHA provides over 9,000 affordable homes to more than 22,000 people.

During PY23, the City provided financing or favorable loan terms to preserve, renovate, or construct affordable rental housing for households at or below 60% of AMI. The City used a combination of financing that included LIHTC, HUD funds, TIF, and City STAR funds. Total units developed or preserved were 1,179. Of these 750 were affordable including 348 units at 30% AMI, 67 units at 50% AMI, and 335 units at 60% AMI or below – 89 units through preservation and 1090 through new construction.

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

With the City of Saint Paul's continued commitment to being a member of the FHIC, the City With the goals identified in the AI, the City has The 2020 AI was finalized by the Fair Housing Implementation Council (FHIC) and The Lawyers Committee for Civil Rights Under Law on January 21, 2021. During the process of drafting the 2020 AI, the Preserving Community and Neighborhood Choice Rule was published and adopted. Our understanding is that there is no longer a formal regulatory or compliance requirement to submit this plan, however, the FHIC has submitted the Final AI to the local field office for feedback.

In the 2020 AI, the following goals were identified:

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

Since submitting the 2020 AI report, the City of Saint Paul has made significant actions toward the goals.

### **THE QUALIFIED ALLOCATION PLAN**

2020 AI (See Impediments: #6, #7, #8, #10) (See Goals: #2, #4, #6, #8)

With an allocation of \$ 870,289.00 and \$891,541.00 for Low-Income Housing Tax Credits (9% credits) for 2023 and 2024, the City has limited financial capacity to produce affordable rental housing. If the 9% allocation is combined with the 4% tax credits, the City is able to finance 6 affordable housing developments each year. As a result, the City must partner with HUD, Minnesota Housing Finance Agency (MHFA), and various foundations to develop other comprehensive financing plans necessary to develop/preserve affordable housing. It is essential that MHFA tax credits are allocated in a manner that equitably develops more affordable housing metro-wide which will advance fair housing choice within the Twin Cities metro area.

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

During the program year, the City established a two-year QAP (2024-2025), which sets the priorities and requirements for multifamily projects that will request funding in the 2023 and 2024 RFPs. This included changes to the procedural manual, selection priorities and scorecard. Full details of changes can be found [here](#). Notable changes include:

### **9% Tax Credits**

- Removal of criteria based on the location of the project (QCT Vs. non-QCT) for both rehabilitation and new construction projects.
- Addition of a criterion that gives priority to naturally occurring affordable housing (NOAH) projects
- Addition of a non-smoking policy criterion in the 4% Scorecard
- Addition of a new criterion regarding "Equity and Cultural Integration"
- Increasing points for projects with more homeless units

### **4% HTC**

- Addition of criteria for preservation and Naturally Occurring Affordable Housing (NOAH)
- Removal of criteria based on the location of the project (QCT Vs. non-QCT) for both rehabilitation and new construction projects.
- Increasing points for projects with more homeless units
- Addition of a non-smoking criteria
- Addition of a new criterion regarding "Equity and Cultural Integration"
- Addition of a criterion providing points for historic projects
- Addition of a criterion providing points for project-based Section 8 developments

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

2014 AI (See Impediments: ) (See Goal:

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

People living with disabilities also typically need city services. In response, the City continues to upgrade city services that can assist residents with disabilities. Some examples are new

City traffic lights designed to respond to the needs of visually-impaired residents and the Ramsey County Emergency Community Center's Vital Emergency Response Information Form that lessens the emergency response time for emergencies affecting City residents with disabilities.

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

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

### **AFFORDABLE SUPPORTIVE RENTAL HOUSING**

2020 AI (See Impediments:) (See Goals: )

To further fair housing choice, the City recognizes the diverse needs of its residents by financing supportive housing citywide and that serves residents with challenges or barriers to housing. Saint Paul has existing affordable supportive housing developments located citywide, including the City-owned Saint Paul Residence (60 units for at-risk of being homeless, and 60 units for long-term homeless units for late stage alcoholics or those with chemical dependency in the Midway neighborhood).

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

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

## **ZONING CODE**

2020 AI (See Impediment: ) (See Goal: )

As a baseline, the City's Zoning Code supports the development of supportive housing because the Zoning Code only requires conditional use permits for supportive housing developments over a certain size or density within residential, traditional neighborhood districts, business and industrial districts. The Zoning Code defines supportive housing as one (1) main building, or portion thereof, on one (1) zoning lot where persons with mental illness, chemical dependency, physical or mental handicaps, and/or persons who have experienced homelessness reside and wherein counseling, training, support groups, and/or similar services are provided to the residents. The Zoning Code also allows SRO facilities to be built in many areas which consequently facilitated the development of the City-owned Saint Paul Residence that serves residents experiencing homelessness with late-stage chronic alcoholism and at-risk of becoming homeless.

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

An Accessory Dwelling Unit (ADU) has been permitted to accompany a single family home in all areas of the City since 2018; since March 2022 (phase 1 of the 1-4 Unit Housing Study amendments), regulations became more flexible by dropping the lot size requirement and increasing the allowable floor area; Sustainable Building Regulations Ordinance established sustainable building regulations for buildings owned, operated or funded by the City ensuring energy efficiency and sustainability and thus lower costs for building owners and ultimately tenants.

The City has supported and approved more recent zoning changes to increase opportunities for multifamily and affordable housing: Both the Marshall Ave Zoning Study, -Stryker Ave Zoning Study, Gold Line Station Area Plan resulted in rezonings of multiple properties to expand locations for multifamily and affordable housing on various corridors of the City. More zoning studies are expected in the future with the G Line (Robert/Rice) BRT corridor, if not also the Purple Line BRT corridor, and Riverview transit corridor.

The definition of *Family* was identified for study by the 2040 Comprehensive Plan and City Council Resolution 18-1204. Under that regulation, only four (4) unrelated people could occupy a dwelling unit, or two (2) parents with their children along with two (2) other people. In 2021, the Saint Paul City Council adopted changes to allow six (6) or fewer adults, with minor children in their care, as the new definition of "household" to replace the former



definition of family.

The City continues work on the 1-4 Unit Housing Study, phase 2 which, if recommended by Planning Commission and adopted by City Council in late 2023, will allow for changes in all of the single family-only zoning districts of the City (RL-R4) as well as the duplex (RT1) and townhome (RT2) zoning districts. Zoning would become more flexible in allowing a range of housing types, and under the proposed new base zoning districts, up to 4 or 5 units on many lots, subject to smaller minimum lot sizes per unit. Proposed density bonuses would allow for one or two additional units on a lot, above the base zoning amount, if affordable units and/or family-sized (3 or more bedroom) units are provided, and/or if 50% of an existing residential structure is retained and converted or added upon. Additionally proposed is greater zoning flexibility for developing accessory dwelling units and cluster lot developments, along with lower minimum lot widths required to subdivide existing lots (i.e. greater flexibility to build smaller/narrower homes). While these zoning changes do not mandate affordable housing, the density bonus will incentivize it, and over time, a less restrictive regulatory approach should increase housing supply and reduce some scarcity in the housing market, potentially leading to modest price stabilization or reductions, and improving overall housing affordability in Saint Paul.

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

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

Many adults entering emergency shelters and transitional housing in Ramsey County are representative of protected classes. A person who identifies as American Indian is 14 times more likely to experience homelessness than a white person and a person who identifies as African American is 8 times more likely to experience homelessness as Furthermore, the status of homelessness effectively has a disparate discriminatory impact because many long-term homeless residents face housing barriers due to challenges with mental health, brain injury, developmental disabilities, cognitive learning disabilities, and/or chemical dependency. Consequently, there is a continuing need to develop and maintain affordable supportive housing strategies based on what we know about who is currently homeless.

For many residents experiencing homelessness, the lack of economic opportunities is also a major barrier to obtaining and retaining stable housing. As previously stated, on average, Ramsey County renters lack enough income (i.e. a minimum hourly wage of \$25.15) to pay the fair-market rent for a two-bedroom apartment. In addition, households who lack sufficient education and/or job training skills are more at-risk of becoming homeless due to the inability to qualify for or find higher wage employment.

The City and Ramsey County receive Emergency Solutions Grant (ESG) funding through direct allocations from HUD. To administer the deployment of City ESG funds more efficiently, the City entered into a Joint Powers Agreement (JPA) with the County. The County, as the lead agency and collaborative applicant for the City of St Paul/ Ramsey County Continuum of Care (COC)- Heading Home Ramsey, administers the ESG funds; selects subrecipients and enters into contracts to implement use of funds; processes subrecipient reimbursements; monitors subrecipient performance; manages HMIS data collection and required reporting to HUD and the City. The HHR ranking committee, made up of HHR steering committee members and individuals with lived experience, is tasked with decision-making on the select ESG projects and does this with consideration of the annual Point in Time count, Housing Inventory Chart, Systems Performance Measures and needs assessment.

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

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

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

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

The COVID-19 pandemic has had a significant impact on the numbers of people who are experiencing homelessness, and the related economic impacts have led to more residents living in unsafe conditions in tents, under bridges, in caves. Between 2016 and 2021, unsheltered homelessness increased by 130%. The 2023 Point-in-Time count just conducted again found well over 300 unsheltered individuals.

We work in collaboration with Ramsey County and our outreach partners to gather information and make decisions on a case-by-case basis to ensure our efforts align with City principles and the Governor's Orders.

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

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

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

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

For PY23, Saint Paul addressed emergency shelter and transitional housing needs of unsheltered residents as follows:

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

The following emergency shelters were supported by ESG:

- The Salvation Army Booth Brown House Shelter for youth
- Lutheran Social Services Safe House Shelter for youth
- Catholic Charities Higher Ground Shelter for adults
- YMCA shelter for adults
- Catholic Charities Family Service Center Shelter for families
- Interfaith Action Project Home Shelter for families
- Breaking Free Shelter for adults and families fleeing domestic violence
- Westside Community Health Services shelter motel vouchers for adults and families
- Listening House Day Shelter for single adults

The following Rapid Rehousing Services were supported by ESG:

- Breaking Free rental support for adults and youth fleeing domestic violence
- Theresa Living Center- medium term rental assistance and legal services including credit repair for single adult women and women with families
- Face to Face- rental assistance for youth

The following Prevention Services were supported by ESG:

- Westside Community Health Services- House Calls rental assistance
- Face to Face- rental assistance for youth

The Face to Face program paired it's ESG RRH and Prevention Services with a federal Work Investment Opportunity (WIOA) grant. As such, the grant allowed them serve youth aged 14-24 that have barriers to employment. These barriers include unstably housed, justice involved, pregnant and parenting, high school dropout, insufficient work history and disabilities. Youth are assigned an Education and Employment Navigator to work on career and education goals. Navigators help them with gaining and maintaining employment. This can be unsubsidized employment, or use of other funds to help them obtain internships with partners in areas where they may have interest in as a long-term career. Face t Face also has classes on work readiness skills, personal development, and financial literacy.

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

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

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

Catholic Charities' Higher Ground facility provides 280 shelter beds which includes medical respite beds, pay-for-stay beds, and 193 permanent SRO supportive housing units. Phase II opened late 2019 adding 177 SRO supportive housing units and a new Opportunity Center. The Opportunity Center open daily for breakfast and lunch is a gathering space that connects service providers to support individuals staying at the Higher Ground homeless shelter or the residents statin the supportive housing and SRO units. Critical services that promote long-term housing stability include: col-location of Ramsey County financial workers to help

individuals certify for or recertify for Emergency Assistance, Housing Support, Medical Assistance and connections to Ramsey County probation officers. and MnCHOICES Aging and Disability service waivers. Other critical services include Social Security Administration navigators, Mental Health services, and Ain Dah Yung Supportive Housing development provides 42 supportive housing units for homeless youth with a focus on American Indian culture, an underserved community.

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

In summary, during PY23, affordable housing and supportive services were provided within the City of Saint Paul to residents experiencing homelessness and residents needing supportive housing, including the elderly, frail elderly, persons with disabilities, persons with HIV/AIDS, persons with chemical dependency, and those with limited English-speaking proficiency. That said, more affordable housing and more affordable supportive housing are needed citywide. In response, the City continues to finance affordable housing developments, and the City of Saint Paul's Comprehensive Plan includes strategies to facilitate the development of affordable housing citywide.

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

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

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

#### Homeless Adults –

- Catholic Charities Higher Ground Shelter for adults
- YMCA shelter for adults
- Breaking Free Shelter for adults and families fleeing domestic violence
- Westside Community Health Services shelter motel vouchers for adults and families
- Listening House Day Shelter for single adults
- Breaking Free rental support for adults and youth fleeing domestic violence

- Theresa Living Center- medium term rental assistance and legal services including credit repair for single adult women and women with families
- Westside Community Health Services- House Calls rental assistance

Homeless Families – Homeless families were assisted with transitional programs through Breaking Free rental support for adults and youth fleeing domestic violence.

- Catholic Charities Family Service Center Shelter for families
- Interfaith Action Project Home Shelter for families
- Breaking Free Shelter for adults and families fleeing domestic violence
- Westside Community Health Services shelter motel vouchers for adults and families
- Theresa Living Center- medium term rental assistance and legal services including credit repair for single adult women and women with families
- Face to Face- rental assistance for youth

Homeless Youth -

- Breaking Free rental support for adults and youth fleeing domestic violence
- Face to Face- rental assistance for youth

Presently, the Heading Home Ramsey CoC has prioritized HUD and Minnesota Department of Human Services funded Permanent Supportive Housing (PSH), Rapid Rehousing (RRH) housing for individuals who meet the HUD definition of chronically homeless. This means our community places an emphasis on individuals who have experience homelessness the longest and who have a disability for all available PSH and RRH housing.

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

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

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

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

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

During PY 2023, the City's Home Loan Fund provided home improvement loans to CDBG-income eligible homeowners, including Deferred Payment Due-on-Sale Home Improvement loans and Saint Paul/Ramsey County Lead Paint Window Replacement program. The City's Home Loan Fund assisted 15 households comprised of 5 female-headed households and 8 households challenged with disabilities. In total, the City's Home Loan Fund assisted 9 White households, 2 Black households, 4 Asian households, 0 Native American or Pacific Islander households, and 1 Hispanic household. Most importantly, the City Home Loan Fund assisted those households in most need including 2 households at 0-30% AMI; 7 households at 31-50% AMI; 6 households at 61-80% AMI.

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

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

In recognition that 1 in 5 City residents speaks a language other than English in their homes and in accordance with Title VI of the Civil rights Act of 1964, 42 U.S.C. § 2000d and Executive Order 13166, the City has developed a Limited English Proficiency Plan (LEP). Based on data collected from a variety of sources, including the Saint Paul Public Schools and the U.S. Census Bureau, the City's primary language groups that are non-English include, but are not

limited to Spanish, Hmong, and Somali. This means that increasingly, City employees are providing services to individuals who may be limited English proficient (LEP) because of national origin. The City's LEP Language Access Plan outlines and describes how the City will improve access to its services for LEP individuals.

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

### **MORTGAGE FORECLOSURE PREVENTION PROGRAM**

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

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

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

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

### **INSPIRING COMMUNITIES PROGRAM**

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

The City of Saint Paul's *Inspiring Communities* program was created to consolidate properties, both for new construction and rehabilitation, acquired with NSP, CDBG, and HRA funds under a single strategy. The *Inspiring Communities* program largely focuses investment on geographically defined cluster areas in neighborhoods most impacted by foreclosure and vacancy. The program funds assist developers with development gap financing for construction of new housing on vacant lots or rehabilitation of vacant structures. As a



neighborhood redevelopment program, *Inspiring Communities* also created construction job opportunities for local residents, Section 3 certified businesses, M/W/SBEs, and advanced equity in contracting and workforce hiring.

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

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

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

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

The City of Saint Paul recognizes that limited English proficiency (LEP) residents are often unable to access housing service information in their primary languages. In recognition that 1 in 5 City residents speaks a language other than English in their homes and in accordance with Title VI of the Civil rights Act of 1964, 42 U.S.C. § 2000d and Executive Order 13166, the City has a Limited English Proficiency Plan (LEP). Based on data collected from a variety of sources, including the Saint Paul Public Schools and the U.S. Census Bureau, the City's primary non-English language groups that are Spanish, Hmong, Karen, and Somali. City employees are increasingly providing information, services, and programs to individuals in various languages. The City's LEP Language Access Plan was just updated in 2023. It outlines and describes how the City will improve access to its programs, services, and information for LEP individuals.

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

### **City Down Payment Assistance**

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

The City launched a Down payment Assistance Program to provide financial assistance for homebuyers at or below 60% Area Median Income (AMI). Qualified homebuyers were eligible

to receive up to \$40,000 for a home down payment, closing costs, and/or property inspection. The program was developed to protect and preserve naturally occurring affordable housing in neighborhoods vulnerable to displacement and gentrification pressures.

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

2020 AI (See Impediments: #1, #2, #3, #4) (See Goals: #3, #7, #9)

Minnesota maintains a high homeownership rate, approximately 72%, but has a 36-percentage point disparity in homeownership rates between white/non-Hispanic households and households of color (*MHP State of the State's Housing 2021*), ranked the 5<sup>th</sup> largest disparity in the country (*Key Trends in Housing*, Minnesota Housing Finance Agency, January 2018).

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

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

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

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

**CHOME OWNERSHIP ALLIANCE - EMERGING HOUSING MARKET INITIATIVES**

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

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

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

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

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

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

The City of Saint Paul has a municipal anti-discrimination ordinance, Chapter 183, that is one of the strongest in the nation. The HREEO department in the City is dedicated to eliminating housing disparities and discrimination under Chapter 183 and the Fair Housing Act. During 2015, HREEO was granted full certification as a HUD Fair Housing Assistance Partner (FHAP) which effectively increased the Department's capacity in bringing the authority of the Fair Housing Act to eligible complaints. Discrimination cases falling under the Fair Housing Act and Chapter 183 are investigated by the Human Rights Investigative Division and cross-filed with HUD's Office of Fair Housing and Equal Opportunity. Subsequently, HREEO is the only FHAP in the State of Minnesota that is substantially equivalent under HUD's work-sharing agreement. The Human Rights Investigative Division has an extensive history of working to eradicate housing discrimination. All the investigators and leadership are trained under HUD

requirements. HREEO staff have conducted Fair Housing continuing legal education training for attorneys and professionals in the housing and property management fields. Furthermore, staff have considerable experience with attempting and conducting conciliation. HREEO has a long history of taking on challenging policy issues, and producing timely, thorough, and useful investigations which have led to individual complainant remedies as well as wider public interest policy changes with landlords and housing providers in our jurisdiction. They have also developed a Know Your Rights seminar that they are planning to roll out this fall with stakeholder groups.

During the program year, HREEO increased its visibility in the community by participating in outreach activities and events. In the year prior, HREEO participated in 4 outreach and engagement events. Thus far in calendar year 2023, they are at 20 Eden and counting. The Human Rights Investigative team and leadership have been very deliberate in this program year to prioritize engagement with stakeholders in the housing area.

The diversity of HREEO's staff reflects the communities it serves. This team is fluent in several languages which include Hmong, Spanish, Tigrinya, Arabic, Turkish, Tagalog, German, and Vietnamese. Staff also have working knowledge of Syriac. In the past, HREEO's staff partnered with the Equal Opportunity Commission and the U.S. Department of Labor to coordinate and organize outreach to the Hmong Community through their vulnerable workers project.

**LEGAL SERVICES: SOUTHERN MINNESOTA LEGAL REGIONAL SERVICES & HOMELINE**

2020 AI (See Impediments: #1, #2, #3, #4, #5 #7, #8) (See Goals: #2, #9)

Often, legal representation is needed to enforce fair housing rights. In response, the City provided financial support for the Housing Equality Law Project, administered by Southern Minnesota Regional Legal Services (SMRLS) which provides fair housing enforcement services. With this grant, the City funds legal support to assist Saint Paul residents who are treated unfairly when seeking or maintaining their housing. Legal services include negotiated settlements, assisting with filing of complaints with enforcement agencies, and representing people in court. Persons who benefit from these services include low-income individuals, persons of color, immigrants and refugees, disabled persons, and female heads of households and their families who were treated unfairly, and in violation of anti-discrimination laws, by landlords when they look for housing, live in housing, or try to keep their housing. The City also contracted CDBG-CV funds to partially fund SMRLS's legal representation for residents experiencing homelessness or those at-risk of becoming homeless to stabilize their housing.

The City of Saint Paul funded a portion of Homeline’s tenant call line up to 2024. This grant is also overseen by HREEO. The Office of Financial Empowerment also assisted with additional funding in 2023.

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

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

**City’s Housing Trust Fund Strategy**

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

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

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

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

- Investments in innovative models for homeownership and wealth building including Accessory Dwelling Units and Community Land Trusts
- Financing to preserve unsubsidized naturally occurring affordable housing units and prevent displacement

- Families First Housing Pilot rental supplement program
- Community Land Trust demonstration program

### **Office of Financial Empowerment**

The Office of Financial Empowerment (OFE) continued its work with internal and external stakeholders.

The City of Saint Paul is part of the Partnership for Equitable and Resilient Communities (PERC) cohort. The Office of Financial Empowerment, along with additional City Departments (PED, DSI, Public Works et al) sit on the PERC work groups, Housing, Infrastructure, and Economic Development. The PERC is in the strategy finalization stage and will work with the City when alignment is identified.

OFE also expanded their outreach by leading Fair Housing and Homeownership social media campaigns during April and June respectively. The focus of the campaigns was to highlight City processes and boost renter and homeownership resources.

The Office of Financial Empowerment continues to work with the internal and external stakeholders to identify additional actions that address the AI goals.

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

2020 AI (See Impediments: )

During the program year, the City of Saint Paul, as part of the FHIC, used Community Development Block Grant (CDBG) funds to grant three organizations with funds to support three projects:

- Eviction Prevention Project
- Fair Housing Trainings for renters and property owners in the seven county area that the FHIC covers; and
- Culturally relevant Home Stretch curriculum

The FHIC released an RFP in May 2024 for continued work within the AI recommendations. The FHIC will release the information within the last quarter of 2024 for the work to take place in 2025. The FHIC is continuing to identify and prioritize the goals and strategies within the 2020 AI to be addressed as a region. The City of Saint Paul continues to work towards understanding the impediments and addressing the goals identified in this AI through coordination with the FHIC and within our individual jurisdiction. A copy of the document may be found here: [2020 Regional Analysis of Impediments to Fair Housing Choice \(AI\)](#). The FHIC will be preparing their next Analysis of Impediments report based on the current or future AFFH rule, whichever is in place.

## **SUMMARY**

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

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

Additional funds to provide supportive services from community partners were awarded through grants from philanthropic partners.

### **Office of Financial Empowerment**

The Office of Financial Empowerment (OFE) continued its work with internal and external stakeholders.

In November 2021 voters approved a rent stabilization ordinance. Through a partnership with OFE and the Department of Safety and Inspections (DSI) a cross-sectional stakeholder group - including renters, homeowners, advocates, policy experts, owners, landlords, real estate, finance, development, and legal professionals - was asked to research rent stabilization ordinances and possible changes to the ordinance during February 2022-May 2022. The group submitted their report in July 2022. The ordinance originally went into effect on May 1, 2022 limiting rent increased to no more than 3%.

The input from the stakeholder group influenced changes to the ordinance. Updated rules were drafted and public comment sought during November 2022. The final rules were approved and published in December of 2022. The City of Saint Paul's rent stabilization ordinance took effect on January 1, 2023. The implementation and administration of rent stabilization was transferred to the City's Department of Safety and Inspections.

Note that a Just Cause vacancy policy, part of the tenant protections ordinance that was recinded in 2021, was added to the rent stabilization rules.

During the plan year, the OFE also secured financial support to support local eviction prevention efforts. The program, implemented by a local, external organization, included notification of eviction filings and education of tenant's legal rights.

The Office of Financial Empowerment continues to work with the internal and external stakeholders to identify additional actions that address the AI goals.

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# TWIN CITIES REGIONAL ASSESSMENT OF FAIR HOUSING



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

**January 21, 2021**

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## **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 38<sup>th</sup> Street and Chicago Avenue, over an allegedly counterfeit \$20 bill. Since then, residents of the Region and the country have stood up to demand that police no longer be able to ravage Black communities. This event has sparked important conversations in the Region and beyond, and we hope that as a result, data in future Analyses of Impediments will show increased opportunity to housing, jobs, and schools for historically disadvantaged populations.

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

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

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

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

## **Proposed Goals and Strategies**

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

*Goal 8: Reduce barriers to mobility.*

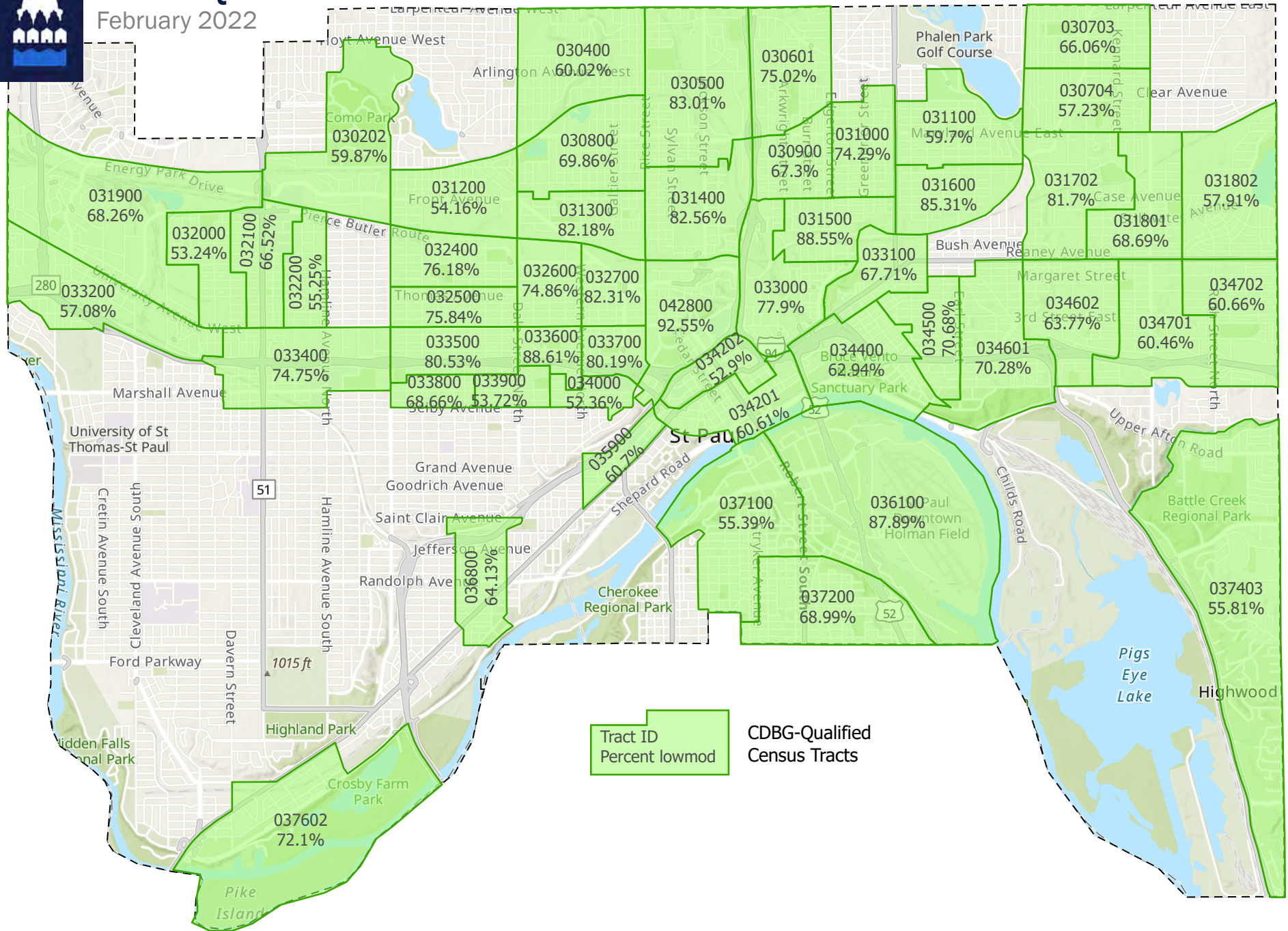
- Enact policies that provide for regular reviews of residency and other preferences for fair housing impacts.
- Implement selective use of payment standards based on Small Area Fair Market Rents (FMRs), to expand housing choice specifically in zip codes that are areas of opportunity. As an example,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

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



# CDBG-Qualified Census Tracts

February 2022



Tract ID  
Percent low/mod

CDBG-Qualified  
Census Tracts



<b>CITY OF SAINT PAUL, MINNESOTA</b>				
<b>CDBG Eligible Census Tracts - 2023</b>				
<b>Geo ID</b>	<b>Census Tract</b>	<b>Low-Income Population in Tract</b>	<b>Total Population in Tract</b>	<b>% Low-Income</b>
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%

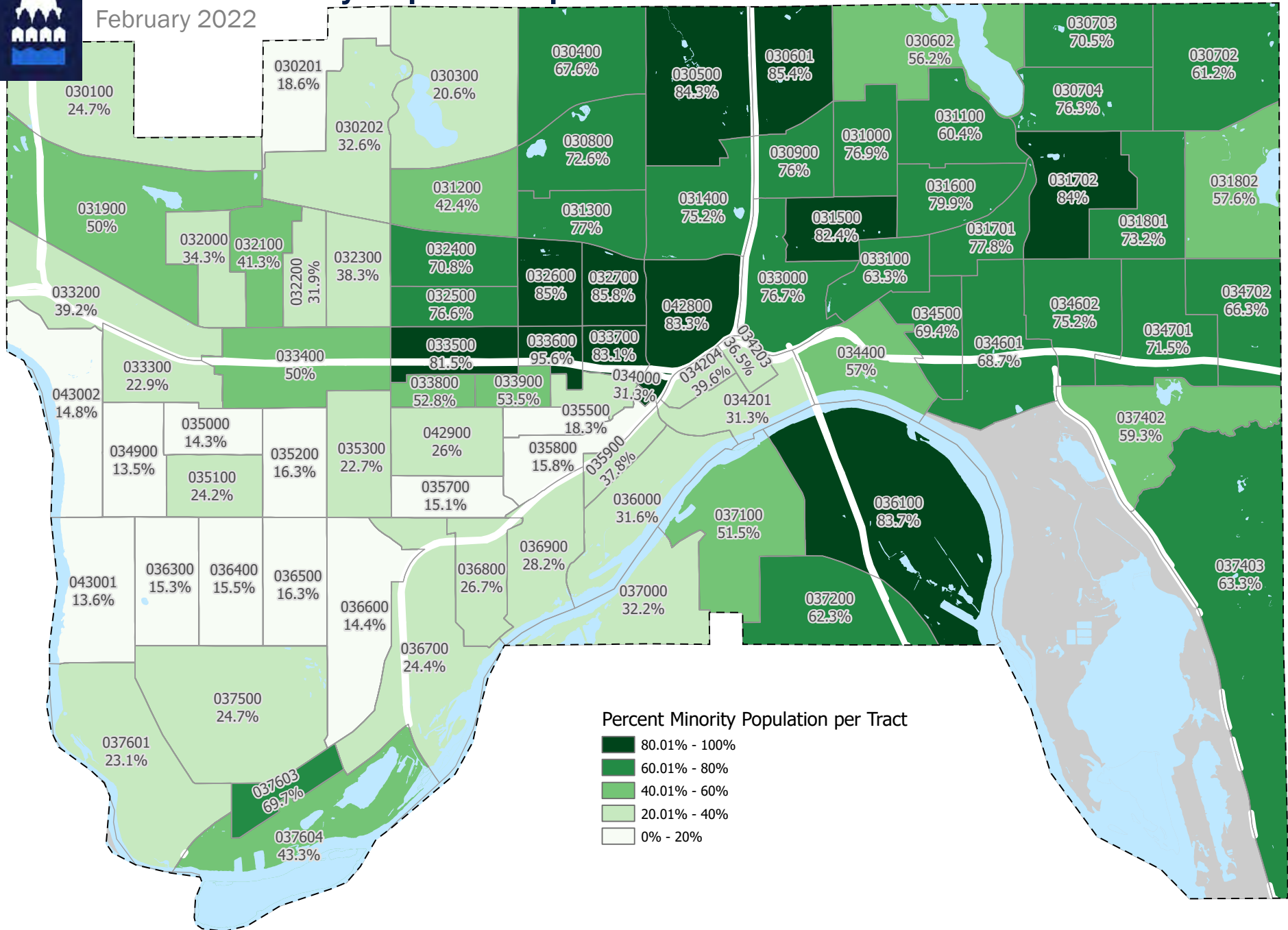
<b>CITY OF SAINT PAUL, MINNESOTA</b>				
<b>CDBG Eligible Census Tracts - 2023</b>				
<b>Geo ID</b>	<b>Census Tract</b>	<b>Low-Income Population in Tract</b>	<b>Total Population in Tract</b>	<b>% Low-Income</b>
27123034000	34000	720	1375	52.36%
27123034201	34201	1100	1815	60.61%
27123034202	34202	2190	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%



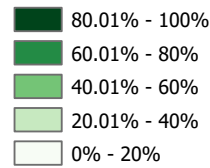


# Percent Minority Population per Census Tract

February 2022



Percent Minority Population per Tract



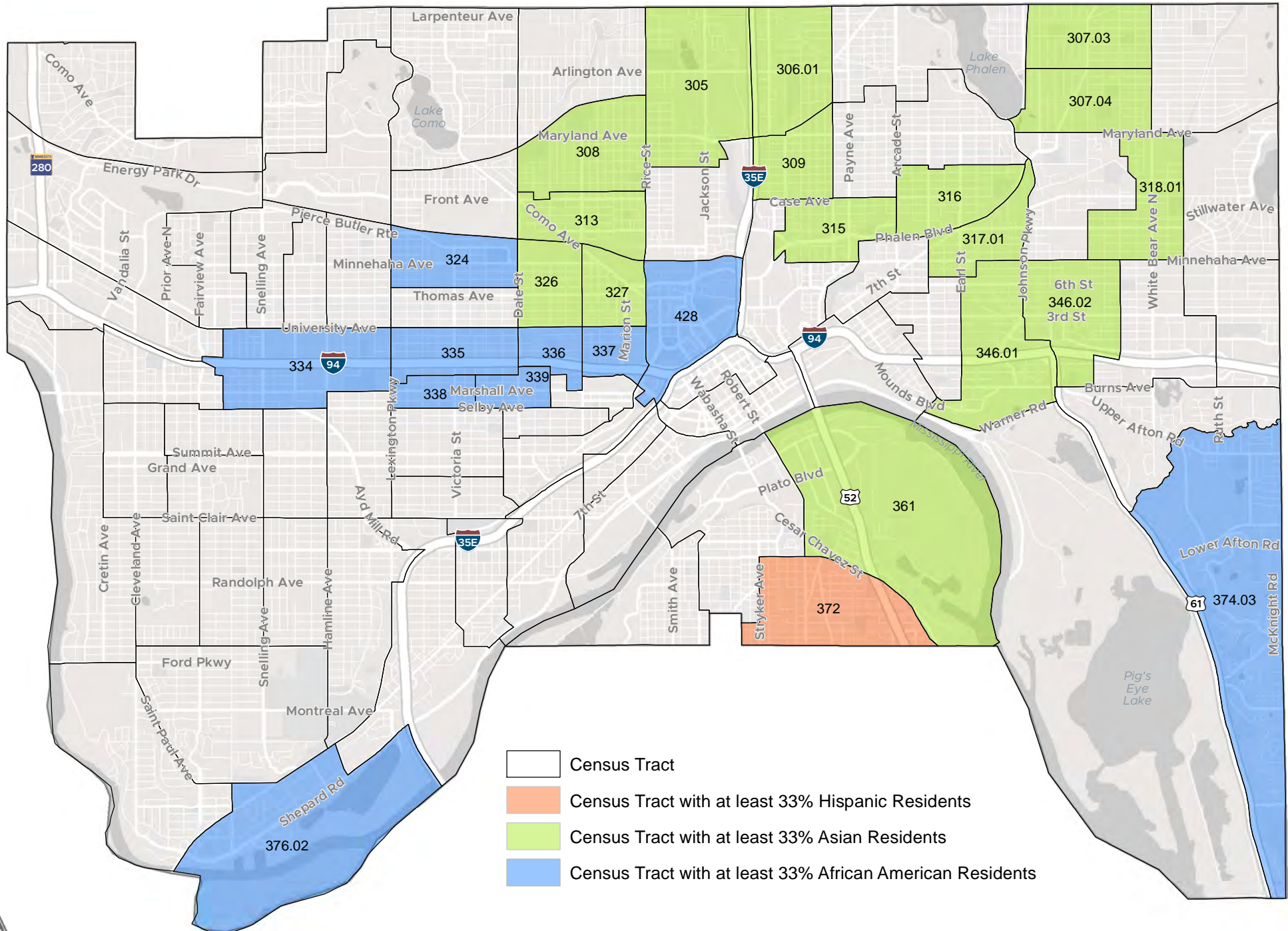
<b>CITY OF SAINT PAUL, MINNESOTA</b>			
<b>Census Tracts with Minority Concentration</b>			
<b>Geo ID</b>	<b>Census Tract</b>	<b>% Minority</b>	<b>% Low-Income</b>
27123030100	30100	24.70%	42.84%
27123030201	30201	18.60%	38.28%
27123030202	30202	32.60%	59.87%
27123030300	30300	20.60%	31.51%
27123030400	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%



<b>CITY OF SAINT PAUL, MINNESOTA</b>			
<b>Census Tracts with Minority Concentration</b>			
<b>Geo ID</b>	<b>Census Tract</b>	<b>% Minority</b>	<b>% Low-Income</b>
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%

<b>CITY OF SAINT PAUL, MINNESOTA</b>			
<b>Census Tracts with Minority Concentration</b>			
<b>Geo ID</b>	<b>Census Tract</b>	<b>% Minority</b>	<b>% Low-Income</b>
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%

# City of Saint Paul Concentrations of Disproportionately Greater Need Subpopulations



- Census Tract
- Census Tract with at least 33% Hispanic Residents
- Census Tract with at least 33% Asian Residents
- Census Tract with at least 33% African American Residents





Summary Report to City of St. Paul on HOME Projects Inspections

Report Period: June 1, 2023 through May 31, 2024

A total of 42 annual reports were reviewed, 144 HOME units physically inspected and 158 tenant files were reviewed.

IDIS No.	Project Name	Project Total Units	HOME Units Total	Fixed/Floating	Inspection Frequency	INSPECTION DATES		No. of Units Inspected	Physical Inspection Results	Desk Audit & Tenant File Review Results	Date Last Rent Increase Approved	Notes
						2023	2024					
1927	2700 University	248	11	Floating	every 3 years	Next Site Visit in 2024	05/07/24	4	1 Unit & 1 Building Findings; Completed work orders received 06/04/24.	Clarifications for file review findings and corrected CHART received on 06/04/24	05/29/24	
1015	Arlington Gardens Apartments	50	49	Fixed	annual	09/20/23	Scheduled after May 31	10	7 Unit & 1 Building Findings; Completed work orders received 01/09/24.	No file review findings; No report findings.	-	
1469	Booth Brown House (03/20/24 POA End)	25	8	Floating	every 2 years	Next Site Visit in 2024	04/10/24	4	No UPCS; POA ended 03/20/2024	Corrections for file review findings and corrected CHART received on 04/30/24	-	05/31/24 PJ Confirmation for AHC to cease monitoring
1990	BROWNstone	35	7	Fixed	every 3 years	Next Site Visit in 2025	Next Site Visit in 2025	-	-	No report findings.	09/15/23	
1925	Cambric Senior Housing	113	7	Fixed	every 3 years	06/21/23	Next Site Visit in 2026	4	1 Unit & 1 Building Findings; Completed work orders received 08/11/23	Corrections for file review findings and corrected CHART received on 10/27/23.	05/29/24	
1607	Commerce II	45	7	Fixed	annual	04/25/23	04/24/24	4	2023: 5 unit & 6 building findings; Completed work orders received 07/25/23. 2024: 6 unit & 6 building findings; Completed work orders received 05/28/24.	2023: Correction for file & report review findings received 07/25/23. 2024: Correction for file & report review findings received 06/04/24.	-	
1242	Cornelia House	47	10	Floating	annual	09/20/23	Scheduled after May 31	4	2 unit & 1 building findings; Completed work orders received 10/24/23.	File and CHART corrections received 10/24/23.	11/15/23	
1312	Crane Ordway	70	16	Floating	annual	07/19/23	Scheduled after May 31	4	3 unit & 3 building findings; Completed work orders received 08/21/23.	No file review findings; No report findings.	06/25/19	
1106	Crestview Community Expansion	44	11	Floating	annual	06/15/23	Scheduled after May 31	4	9 unit & 3 exterior findings; Completed work orders received 10/02/23.	File and CHART corrections received 10/02/23.	05/21/19	
1539	Delancey Apartments	37	13	Fixed	annual	07/26/23	Scheduled after May 31	4	3 unit & 1 building findings; Completed work orders received 11/15/23.	No file review findings; Updated CHART received 09/06/23.	03/09/20	
1912	Elders Lodge	43	17	Floating	annual	08/10/23	Scheduled after May 31	4	No Findings	No file review findings; No report findings.	-	
1160	Graham Place	121	8	Fixed	annual	05/16/23	03/19/24	4	2023: 4 unit & 2 building findings; Completed work orders received 07/17/23. 2024: 1 unit, 7 building, & 1 exterior findings; Completed work orders received 05/10/24.	2023/2024: No file review findings; No report findings.	10/27/23	
1822	Hamline Station East	51	5	Floating	annual	07/24/23	Scheduled after May 31	4	8 unit, 6 building, & 5 outside findings; Completed work orders received 10/02/23.	File and CHART corrections received 10/02/23.	-	
1821	Hamline Station West	57	5	Floating	annual	07/24/23	Scheduled after May 31	4	3 unit & 4 building findings; Completed work orders received 10/06/23.	File and CHART corrections received 10/06/23.	10/21/19	
1117	Historic Bluff Landing	16	2	Floating	every 2 years	-	Scheduled after May 31	-	-	No report findings	09/12/23	
1014	Jackson Street Village	24	8	Floating	every 2 years	4/25/23	Next Site Visit in 2025	-	-	No report findings	07/05/19	
1603	Kimball Court	76	15	Floating	annual	08/24/23	Scheduled after May 31	4	6 unit & 8 building findings; Completed work orders received 10/20/23.	No file review findings; Updated CHART received 10/26/23	10/30/23	
1224	Lyon's Court	60	3	Fixed	annual	09/19/23	03/20/24	3	2023/2024: No Findings	2023/2024: No file review findings; No report findings.	11/03/23	
1885	Maryland Park Apartments	172	6	Fixed	annual	05/24/23	Scheduled after May 31	-	15 unit & 3 building findings; Completed work orders received 06/21/23.	File and CHART corrections received 06/21/23.	05/23/24	
1811	Midway Pointe	50	4	Fixed	annual	09/20/23	Scheduled after May 31	4	No Findings	File review finding clarified; No report findings.	02/10/20	
1307	Model Cities FFSH	6	5	Floating	every 2 years	08/31/23	Next Site Visit in 2025	4	1 unit finding; Completed work order received 08/31/23.	No file review findings; No report findings.	12/20/23	



## Summary Report to City of St. Paul on HOME Projects Inspections

Report Period: June 1, 2023 through May 31, 2024

A total of 42 annual reports were reviewed, 144 HOME units physically inspected and 158 tenant files were reviewed.

IDIS No.	Project Name	Project Total Units	HOME Units Total	Fixed/Floating	Inspection Frequency	INSPECTION DATES		No. of Units Inspected	Physical Inspection Results	Desk Audit & Tenant File Review Results	Date Last Rent Increase Approved	Notes
						2023	2024					
1760	Northern Warehouse	52	5	Fixed	annual	08/10/23	Scheduled after May 31	4	1 unit & 2 building findings; Completed work orders received 09/20/23.	No file review findings; No report findings.	09/12/23	
2334	Parkway Apartments (10/25/22 POA Start)	45	9	Floating	every 3 years	08/02/23	Next Site Visit in 2026	4	1 unit, 3 building, & 2 exterior findings; Completed work orders received 09/15/23.	Management followup RE: possible gross rent compliance.	-	
1253	Phalen Senior Lofts	73	35	Floating	annual	09/19/23	03/20/24	14	2023: 4 unit, 1 building, & 1 exterior findings; Completed work orders received 10/02/23. 2024: 2 unit findings; Completed work orders received 04/15/24.	2023/2024: No file review findings; No report findings.	11/03/23	Project inspected twice within reporting period; total 14 units.
2511	Phalen Village Apartments (No POA)	76	9	Fixed	every 3 years	-	-	-				
1938	Prior Crossing	44	5	Floating	every 3 years	08/24/23	Next Site Visit in 2026	4	4 unit, 6 building, & 1 exterior findings; Uncorrected as of 7/15/24. PY2022 Report to PJ details AHC's efforts to obtain response.	Uncorrected as of 7/15/24. PY2022 Report to PJ details AHC's efforts to obtain response.	11/22/21	
1605	Renaissance Box	70	4	Floating	annual	07/19/23	Scheduled after May 31	4	8 unit & 2 building findings; Completed work orders received 09/25/23.	No file review findings; No report findings.	01/12/16	
2259	Rice Street Flats	41	9	Floating	every 3 years	04/25/23	Next Site Visit in 2026	-	9 building & 1 exterior findings; Completed work orders received 05/23/23.	Corrections for file review findings and corrected CHART received 05/23/23.	-	4/25/23 Site Review completed to align with LIHTC Site Review
1816	Rolling Hills Apartments	108	8	Fixed	annual	05/10/23	04/16/24	4	2023: 13 unit & 7 building findings; Completed work orders received 06/02/23. 2024: 3 unit & 11 building findings; Completed work orders received 05/16/24.	2023/2024: No file review findings; No report findings.	10/28/22	
1052	Seabury (05-22-23 POA End)	50	49	Fixed	annual	09/21/23	-	10	No UPCS; POA ended 05/22/2023	No file review findings; No report findings.	07/05/12	
PI 001	Selby Grotto Apartments (08-12-24 POA En	40	3	Floating	annual	08/24/23	Scheduled after May 31	3	1 unit finding; Completed work order received 09/22/23.	No file review findings; No report findings.	06/01/23	





Summary Report to City of St. Paul on HOME Projects Inspections

Report Period: June 1, 2023 through May 31, 2024

A total of 42 annual reports were reviewed, 144 HOME units physically inspected and 158 tenant files were reviewed.

IDIS No.	Project Name	Project Total Units	HOME Units Total	Fixed/Floating	Inspection Frequency	INSPECTION DATES		No. of Units Inspected	Physical Inspection Results	Desk Audit & Tenant File Review Results	Date Last Rent Increase Approved	Notes
						2023	2024					
2136	Selby Milton Victoria Apartments	34	2	Fixed	every 3 years	5/9/23	Next Site Visit in 2026	2	1 unit & 1 building findings; Completed work orders received 07/12/23.	No report findings; Corrections for file review findings received 07/12/23.	12/21/23	
1051	Seventh Landing	13	12	Fixed	every 2 years	4/25/23	Next Site Visit in 2025	-	-	No report findings	06/21/22	
947	Sibley Park Apartments (05-30-23 POA End)	114	25	Floating	annual	04/27/23	04/11/24	5	2023: 5 unit, 6 building & 1 exterior findings; Completed work orders received 06/30/23. 2024: No NSPIRE; POA ended 05-30-23	2023: File and CHART corrections received 06/30/23. 2024: File and CHART corrections received 05/13/24.	10/31/19	05/22/24 PJ Confirmation for AHC to cease monitoring
2441	Stryker Senior Housing (No POA)	57	10	Fixed	every 3 years	-	-	-	1st Monitoring anticipated in Calendar 2025		-	
1696	Terraces (Wabasha/McLean)	35	17	Fixed	annual	08/10/23	Scheduled after May 31	4	2 unit & 1 building finding; Completed work orders received 09/15/23.	No file review findings; No report findings.	05/16/22	
2138	Thomas Avenue Flats	51	7	Fixed	every 3 years	08/01/23	Next Site Visit in 2026	4	1 unit & 1 building findings; Completed work orders received 09/11/23.	No file review findings; No report findings.	04/22/20	
2514	Treehouse (No POA)	36	4	Fixed	every 3 years	-	-	-	1st Monitoring anticipated in Calendar 2025		-	
2298	Verdant aka West Side Flats III (5/26/22 POA Start)	82	8	Fixed	every 3 years	Next Site Visit in 2025	Next Site Visit in 2025	-	-	No report findings	11/08/23	
1744	West Side Flats	178	17	Fixed	annual	08/16/23	03/20/24	8	2023: 3 unit, 3 building & 2 exterior findings; Completed work orders received 10/06/23. 2024: 2 unit, 2 building & 4 exterior findings; Completed work orders received 04/12/24.	2023: File and CHART corrections received 10/06/23. 2024: No file review findings; No report findings.	11/08/23	Project inspected twice within reporting period; total 8 units.
1914	Western U Plaza	60	2	Fixed	annual	06/14/23	Scheduled after May 31	2	3 unit, 4 building, & 1 exterior findings; Completed work orders received 07/14/23.	No file review findings; No report findings.	09/15/23	
1526	Winnipeg Apartments	56	5	Floating	annual	08/24/23	Scheduled after May 31	4	1 building finding; Completed work order received 09/29/23.	File and CHART corrections received 09/29/23.	06/01/23	
1399	YWCA-Grotto	8	2	Floating	every 2 years	09/26/23	Next Site Visit in 2025	2	1 building finding; Completed work order received 10/31/23.	No report findings; Corrections for file review findings received 10/31/23.	10/31/17	
1285	YWCA-Oxford	12	12	Fixed	every 2 years	09/26/23	Next Site Visit in 2025	4	5 unit, 3 building, & 2 exterior findings; Completed work orders received 10/31/23.	No report findings; Corrections for file review findings received 10/31/23.	10/31/17	
1105	YWCA-Lexington	18	3	Fixed	every 2 years	09/26/23	Next Site Visit in 2025	3	4 unit & 3 building findings; Completed work orders received 10/31/23.	No report findings; Corrections for file review findings received 10/31/23.	10/31/17	
		2743	479					158				

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

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

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

	Office of Community Planning and Development U.S. Department of Housing and Urban Development Integrated Disbursement and Information System PR26 - CDBG Financial Summary Report Program Year 2023 ST. PAUL , MN	DATE: 07-26-24 TIME: 13:03 PAGE: 1
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**PART I: SUMMARY OF CDBG RESOURCES**

01 UNEXPENDED CDBG FUNDS AT END OF PREVIOUS PROGRAM YEAR	26,621,732.96
02 ENTITLEMENT GRANT	6,727,557.00
03 SURPLUS URBAN RENEWAL	0.00
04 SECTION 108 GUARANTEED LOAN FUNDS	0.00
05 CURRENT YEAR PROGRAM INCOME	643,104.01
05a CURRENT YEAR SECTION 108 PROGRAM INCOME (FOR SI TYPE)	0.00
06 FUNDS RETURNED TO THE LINE-OF-CREDIT	0.00
06a FUNDS RETURNED TO THE LOCAL CDBG ACCOUNT	70,000.00
07 ADJUSTMENT TO COMPUTE TOTAL AVAILABLE	0.00
08 TOTAL AVAILABLE (SUM, LINES 01-07)	34,062,393.97

**PART II: SUMMARY OF CDBG EXPENDITURES**

09 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION	6,367,302.97
10 ADJUSTMENT TO COMPUTE TOTAL AMOUNT SUBJECT TO LOW/MOD BENEFIT	0.00
11 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 09 + LINE 10)	6,367,302.97
12 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	1,671,787.15
13 DISBURSED IN IDIS FOR SECTION 108 REPAYMENTS	0.00
14 ADJUSTMENT TO COMPUTE TOTAL EXPENDITURES	0.00
15 TOTAL EXPENDITURES (SUM, LINES 11-14)	8,039,090.12
16 UNEXPENDED BALANCE (LINE 08 - LINE 15)	26,023,303.85

**PART III: LOWMOD BENEFIT THIS REPORTING PERIOD**

17 EXPENDED FOR LOW/MOD HOUSING IN SPECIAL AREAS	0.00
18 EXPENDED FOR LOW/MOD MULTI-UNIT HOUSING	970,608.49
19 DISBURSED FOR OTHER LOW/MOD ACTIVITIES	5,265,697.48
20 ADJUSTMENT TO COMPUTE TOTAL LOW/MOD CREDIT	0.00
21 TOTAL LOW/MOD CREDIT (SUM, LINES 17-20)	6,236,305.97
22 PERCENT LOW/MOD CREDIT (LINE 21/LINE 11)	97.94%

**LOW/MOD BENEFIT FOR MULTI-YEAR CERTIFICATIONS**

23 PROGRAM YEARS(PY) COVERED IN CERTIFICATION	PY: 2023 PY: 2024 PY: 2025
24 CUMULATIVE NET EXPENDITURES SUBJECT TO LOW/MOD BENEFIT CALCULATION	6,367,302.97
25 CUMULATIVE EXPENDITURES BENEFITING LOW/MOD PERSONS	6,236,305.97
26 PERCENT BENEFIT TO LOW/MOD PERSONS (LINE 25/LINE 24)	97.94%

**PART IV: PUBLIC SERVICE (PS) CAP CALCULATIONS**

27 DISBURSED IN IDIS FOR PUBLIC SERVICES	748,093.47
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28 PS UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	428,000.00
29 PS UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	377,093.47
30 ADJUSTMENT TO COMPUTE TOTAL PS OBLIGATIONS	0.00
31 TOTAL PS OBLIGATIONS (LINE 27 + LINE 28 - LINE 29 + LINE 30)	799,000.00
32 ENTITLEMENT GRANT	6,727,557.00
33 PRIOR YEAR PROGRAM INCOME	2,234,647.65
34 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PS CAP	0.00
35 TOTAL SUBJECT TO PS CAP (SUM, LINES 32-34)	8,962,204.65
36 PERCENT FUNDS OBLIGATED FOR PS ACTIVITIES (LINE 31/LINE 35)	8.92%
<b>PART V: PLANNING AND ADMINISTRATION (PA) CAP</b>	
37 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	1,671,787.15
38 PA UNLIQUIDATED OBLIGATIONS AT END OF CURRENT PROGRAM YEAR	224,182.54
39 PA UNLIQUIDATED OBLIGATIONS AT END OF PREVIOUS PROGRAM YEAR	560,146.87
40 ADJUSTMENT TO COMPUTE TOTAL PA OBLIGATIONS	0.00
41 TOTAL PA OBLIGATIONS (LINE 37 + LINE 38 - LINE 39 +LINE 40)	1,335,822.82
42 ENTITLEMENT GRANT	6,727,557.00
43 CURRENT YEAR PROGRAM INCOME	643,104.01
44 ADJUSTMENT TO COMPUTE TOTAL SUBJECT TO PA CAP	0.00
45 TOTAL SUBJECT TO PA CAP (SUM, LINES 42-44)	7,370,661.01
46 PERCENT FUNDS OBLIGATED FOR PA ACTIVITIES (LINE 41/LINE 45)	18.12%

**LINE 17 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 17**

No data returned for this view. This might be because the applied filter excludes all data.

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

<u>Plan Year</u>	<u>IDIS Project</u>	<u>IDIS</u>	<u>Activity</u>	<u>Activity Name</u>	<u>Matrix Code</u>	<u>National Objective</u>	<u>Drawn Amount</u>
2017	2	2134		650-658 Sherburne	01	LMH	\$5,217.97
2022	1	2478		Rondo CLT Property Acquisitions for Rental	01	LMH	\$49,080.65
					<b>01</b>	<b>Matrix Code</b>	<b>\$54,298.62</b>
2021	8	2420		American House Rehabilitation	14B	LMH	\$37,500.00
2022	8	2460		653 Galtier St (653 Artists Lofts)	14B	LMH	\$720,349.87
2023	11	2495		833 University	14B	LMH	\$158,460.00
					<b>14B</b>	<b>Matrix Code</b>	<b>\$916,309.87</b>
<b>Total</b>							<b>\$970,608.49</b>

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

<u>Plan Year</u>	<u>IDIS Project</u>	<u>IDIS Activity</u>	<u>voucher Number</u>	<u>Activity Name</u>	<u>Matrix Code</u>	<u>National Objective</u>	<u>Drawn Amount</u>
2019	18	2443	6844781	100 E 10th St (Pedro Park)	03F	LMA	\$8,698.80

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2022	10	2449	6902019	Duluth and Case Play Area 2022	03F	LMA	\$35,884.75
2022	11	2448	6902019	Hazel Park Play Area 2022	03F	LMA	\$53,944.50
2023	1	2504	6902019	Prospect Park	03F	LMA	\$6,092.97
					<b>03F</b>	<b>Matrix Code</b>	<b>\$104,621.02</b>
2022	14	2451	6860218	296 W 7th St (Fire Station 51)	03O	LMA	\$218,318.75
2022	14	2451	6870494	296 W 7th St (Fire Station 51)	03O	LMA	\$1,305.57
2022	14	2451	6876741	296 W 7th St (Fire Station 51)	03O	LMA	\$203,964.72
2022	14	2451	6877445	296 W 7th St (Fire Station 51)	03O	LMA	\$5,600.00
2022	14	2451	6904964	296 W 7th St (Fire Station 51)	03O	LMA	\$145,332.44
					<b>03O</b>	<b>Matrix Code</b>	<b>\$574,521.48</b>
2019	18	2396	6844781	1790-1800 University (Keystone)	03Z	LMC	\$29,318.37
					<b>03Z</b>	<b>Matrix Code</b>	<b>\$29,318.37</b>
2023	8	2505	6902019	Capitol City Youth Employment	05H	LMC	\$371,000.00
					<b>05H</b>	<b>Matrix Code</b>	<b>\$371,000.00</b>
2022	4	2461	6844781	2023 District 1 Community Engagement	05I	LMA	\$5,231.30
2022	4	2461	6860218	2023 District 1 Community Engagement	05I	LMA	\$12,835.90
2022	4	2461	6902019	2023 District 1 Community Engagement	05I	LMA	\$16,932.80
2022	4	2462	6791754	2023 District 2 Community Engagement	05I	LMA	\$14,115.88
2022	4	2463	6844781	2023 District 3 Community Engagement	05I	LMA	\$5,275.69
2022	4	2463	6860218	2023 District 3 Community Engagement	05I	LMA	\$29,724.31
2022	4	2465	6818600	2023 District 4 Community Engagement	05I	LMA	\$9,138.42
2022	4	2465	6860218	2023 District 4 Community Engagement	05I	LMA	\$25,861.58
2022	4	2466	6791754	2023 District 5 Community Engagement	05I	LMA	\$16,718.73
2022	4	2466	6818600	2023 District 5 Community Engagement	05I	LMA	\$336.85
2022	4	2467	6791754	2023 District 6 Community Engagement	05I	LMA	\$10,440.35
2022	4	2467	6818600	2023 District 6 Community Engagement	05I	LMA	\$15,979.59
2022	4	2467	6860218	2023 District 6 Community Engagement	05I	LMA	\$9.77
2022	4	2468	6870494	2023 District 7 Community Engagement	05I	LMA	\$17,500.05
2022	4	2468	6877445	2023 District 7 Community Engagement	05I	LMA	\$17,499.95
2022	4	2469	6844781	2023 District 8 Community Engagement	05I	LMA	\$27,486.14
2022	4	2469	6877445	2023 District 8 Community Engagement	05I	LMA	\$7,513.86
2022	4	2470	6818600	2023 District 11 Community Engagement	05I	LMA	\$35,000.00
2022	4	2471	6791754	2023 District 17 Community Engagement	05I	LMA	\$8,769.25
2022	4	2471	6818600	2023 District 17 Community Engagement	05I	LMA	\$5,261.55
2022	4	2471	6844781	2023 District 17 Community Engagement	05I	LMA	\$7,015.40
2022	4	2471	6860218	2023 District 17 Community Engagement	05I	LMA	\$5,446.10
					<b>05I</b>	<b>Matrix Code</b>	<b>\$294,093.47</b>
2022	3	2444	6877445	2022 Block Nurse Program	05M	LMC	\$83,000.00
					<b>05M</b>	<b>Matrix Code</b>	<b>\$83,000.00</b>
2021	6	2380	6791754	2021 DBNHS: East Side Home Ownership RFL	12	LMH	\$9,653.62
2021	6	2380	6818600	2021 DBNHS: East Side Home Ownership RFL	12	LMH	\$3,719.81
2022	6	2433	6818600	2022 DBNHS: East Side Home Ownership Initiative	12	LMH	\$15,020.76
2022	6	2433	6844781	2022 DBNHS: East Side Home Ownership Initiative	12	LMH	\$89,891.02
2022	6	2433	6860218	2022 DBNHS: East Side Home Ownership Initiative	12	LMH	\$107,239.78

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2022	6	2433	6870494	2022 DBNHS: East Side Home Ownership Initiative	12	LMH	\$387,081.16
2023	9	2498	6870494	2023 DBNHS: East Side Home Ownership Initiative	12	LMH	\$34,888.67
2023	9	2498	6876741	2023 DBNHS: East Side Home Ownership Initiative	12	LMH	\$187,412.02
2023	9	2498	6904964	2023 DBNHS: East Side Home Ownership Initiative	12	LMH	\$2,699.31
					<b>12</b>	<b>Matrix Code</b>	<b>\$837,606.15</b>
2018	7	2137	6818600	69 Garfield	14A	LMH	\$61,785.00
2020	7	2317	6902705	NENDC: Home Improvement Plus	14A	LMH	\$8,955.89
2022	7	2436	6818600	2022 DBNHS: East Side Home Improvement RLF	14A	LMH	\$113,465.10
2022	7	2436	6844781	2022 DBNHS: East Side Home Improvement RLF	14A	LMH	\$13,686.28
2022	7	2436	6860218	2022 DBNHS: East Side Home Improvement RLF	14A	LMH	\$89,284.72
2022	7	2436	6902705	2022 DBNHS: East Side Home Improvement RLF	14A	LMH	\$66,701.78
2022	7	2437	6791754	2022 NeighborWorks HP: Greeline Home Repair Program	14A	LMH	\$85,581.35
2022	7	2437	6818600	2022 NeighborWorks HP: Greeline Home Repair Program	14A	LMH	\$9,632.89
2022	7	2437	6860218	2022 NeighborWorks HP: Greeline Home Repair Program	14A	LMH	\$10,922.00
2022	7	2437	6870494	2022 NeighborWorks HP: Greeline Home Repair Program	14A	LMH	\$8,033.50
2022	7	2437	6877445	2022 NeighborWorks HP: Greeline Home Repair Program	14A	LMH	\$26,377.13
2022	7	2437	6904964	2022 NeighborWorks HP: Greeline Home Repair Program	14A	LMH	\$125.00
2022	7	2438	6791754	2022 NeighborWorks HP: North End Revitalization Fund	14A	LMH	\$1,240.14
2022	7	2438	6818600	2022 NeighborWorks HP: North End Revitalization Fund	14A	LMH	\$498.00
2022	7	2438	6860218	2022 NeighborWorks HP: North End Revitalization Fund	14A	LMH	\$1,214.28
2022	7	2438	6870494	2022 NeighborWorks HP: North End Revitalization Fund	14A	LMH	\$660.00
2022	7	2438	6877445	2022 NeighborWorks HP: North End Revitalization Fund	14A	LMH	\$37,638.29
2022	7	2438	6904964	2022 NeighborWorks HP: North End Revitalization Fund	14A	LMH	\$18,133.05
2022	7	2439	6902705	2022 NeighborWorks HP: St. Paul Home Repair Loan Fund	14A	LMH	\$105,821.54
2022	7	2442	6791754	2022 Citywide Homeowner Improvement Loan Program	14A	LMH	\$147,965.49
2022	7	2442	6818600	2022 Citywide Homeowner Improvement Loan Program	14A	LMH	\$156,444.00
2022	7	2442	6844781	2022 Citywide Homeowner Improvement Loan Program	14A	LMH	\$6,700.00
2022	7	2442	6860218	2022 Citywide Homeowner Improvement Loan Program	14A	LMH	\$14,141.65
2022	7	2450	6860218	2022 Window Replacement and Low Impact Stabilization Lead Hazard Control	14A	LMH	\$73,583.00
2022	7	2450	6870494	2022 Window Replacement and Low Impact Stabilization Lead Hazard Control	14A	LMH	\$76,365.00
2023	10	2496	6818600	2023 Citywide Homeowner Improvement Loan Program	14A	LMH	\$44,103.00
2023	10	2496	6844781	2023 Citywide Homeowner Improvement Loan Program	14A	LMH	\$83,402.00
2023	10	2496	6860218	2023 Citywide Homeowner Improvement Loan Program	14A	LMH	\$346,619.32
2023	10	2496	6876741	2023 Citywide Homeowner Improvement Loan Program	14A	LMH	\$82,385.00
2023	10	2496	6880513	2023 Citywide Homeowner Improvement Loan Program	14A	LMH	\$73,509.46
2023	10	2496	6904964	2023 Citywide Homeowner Improvement Loan Program	14A	LMH	\$61,895.97
2023	10	2497	6870494	2023 DBNHS: East Side Home Improvement RLF	14A	LMH	\$103,755.37
2023	10	2497	6876741	2023 DBNHS: East Side Home Improvement RLF	14A	LMH	\$26,547.15
2023	10	2497	6904964	2023 DBNHS: East Side Home Improvement RLF	14A	LMH	\$53,530.30
2023	10	2501	6902705	2023 NeighborWorks HP: St. Paul Home Repair Loan Fund	14A	LMH	\$171,163.96
					<b>14A</b>	<b>Matrix Code</b>	<b>\$2,181,866.61</b>
2022	9	2440	6818600	2022 ESND: East Side BIF	14E	LMA	\$9,240.00
2022	9	2440	6844781	2022 ESND: East Side BIF	14E	LMA	\$2,992.00
2022	9	2440	6860218	2022 ESND: East Side BIF	14E	LMA	\$12,468.00



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2022	9	2484	6818600	979 Arcade (ESNDC BIF 2022)	14E	LMA	\$25,500.00
2022	9	2484	6844781	979 Arcade (ESNDC BIF 2022)	14E	LMA	\$2,800.00
2022	9	2484	6860218	979 Arcade (ESNDC BIF 2022)	14E	LMA	\$19,865.00
2022	9	2493	6860218	1134 Payne Ave (ESNDC BIF 2022)	14E	LMJ	\$41,093.93
2022	9	2494	6818600	1048 Payne Oriental Market (ESNDC 2022 BIF)	14E	LMA	\$8,010.00
2022	9	2494	6860218	1048 Payne Oriental Market (ESNDC 2022 BIF)	14E	LMA	\$3,150.00
2022	9	2512	6870494	950 Arcade St ( Family Foods Market)	14E	LMA	\$29,990.15
2022	9	2513	6844781	781 E 7th St (Storehouse Grocers) ESNDC BIF 2022	14E	LMJ	\$19,018.78
2022	9	2513	6860218	781 E 7th St (Storehouse Grocers) ESNDC BIF 2022	14E	LMJ	\$10,821.00
2022	9	2527	6870494	959 Arcade (Far East Bar Restaurant) ESNDC BIF 2022	14E	LMA	\$21,794.79
2022	9	2527	6904964	959 Arcade (Far East Bar Restaurant) ESNDC BIF 2022	14E	LMA	\$3,254.78
2023	12	2509	6860218	2023 ESNDC: East Side BIF	14E	LMA	\$3,389.00
2023	12	2509	6877445	2023 ESNDC: East Side BIF	14E	LMA	\$3,128.00
2023	12	2509	6904964	2023 ESNDC: East Side BIF	14E	LMA	\$9,982.00
2023	12	2528	6877445	977 Payne Ave (East Side Arts Council) ESNDC BIF 2023	14E	LMA	\$19,510.00
2023	12	2528	6904964	977 Payne Ave (East Side Arts Council) ESNDC BIF 2023	14E	LMA	\$3,480.00
					<b>14E</b>	<b>Matrix Code</b>	<b>\$249,487.43</b>
2021	7	2447	6818600	2022 Rehab Salaries	14H	LMH	\$63,242.68
2021	7	2447	6860218	2022 Rehab Salaries	14H	LMH	\$69,875.26
2023	10	2492	6860218	2023 Rehab Salaries	14H	LMH	\$199,657.29
2023	10	2492	6870494	2023 Rehab Salaries	14H	LMH	\$98,711.57
2023	10	2492	6904964	2023 Rehab Salaries	14H	LMH	\$41,631.14
					<b>14H</b>	<b>Matrix Code</b>	<b>\$473,117.94</b>
2022	9	2485	6860218	84 Wabasha St S (Crasqui Restaurant)	18A	LMJ	\$49,000.00
2023	12	2510	6860218	450 Lexington Parkway (Life Juices)	18A	LMA	\$18,065.01
					<b>18A</b>	<b>Matrix Code</b>	<b>\$67,065.01</b>
<b>Total</b>							<b>\$5,265,697.48</b>

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


Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity to prevent	Activity Name	Grant Number	Fund Type	Matrix Code	National Objective	Drawn Amount
2023	8	2505	6902019	No	Capitol City Youth Employment	B20MC270007	LA	05H	LMC	\$70,000.00
2023	8	2505	6902019	No	Capitol City Youth Employment	B23MC270007	EN	05H	LMC	\$301,000.00
								<b>05H</b>	<b>Matrix Code</b>	<b>\$371,000.00</b>
2022	4	2461	6844781	No	2023 District 1 Community Engagement	B22MC270007	EN	05I	LMA	\$5,231.30
2022	4	2461	6860218	No	2023 District 1 Community Engagement	B22MC270007	EN	05I	LMA	\$12,835.90
2022	4	2461	6902019	No	2023 District 1 Community Engagement	B22MC270007	EN	05I	LMA	\$16,932.80
2022	4	2462	6791754	No	2023 District 2 Community Engagement	B22MC270007	EN	05I	LMA	\$14,115.88
2022	4	2463	6844781	No	2023 District 3 Community Engagement	B22MC270007	EN	05I	LMA	\$5,275.69
2022	4	2463	6860218	No	2023 District 3 Community Engagement	B22MC270007	EN	05I	LMA	\$29,724.31
2022	4	2465	6818600	No	2023 District 4 Community Engagement	B22MC270007	EN	05I	LMA	\$9,138.42
2022	4	2465	6860218	No	2023 District 4 Community Engagement	B22MC270007	EN	05I	LMA	\$25,861.58
2022	4	2466	6791754	No	2023 District 5 Community Engagement	B22MC270007	EN	05I	LMA	\$16,718.73
2022	4	2466	6818600	No	2023 District 5 Community Engagement	B22MC270007	EN	05I	LMA	\$336.85

Attachment F

2022	4	2467	6791754	No	2023 District 6 Community Engagement	B22MC270007	EN	05I	LMA	\$10,440.35
2022	4	2467	6818600	No	2023 District 6 Community Engagement	B22MC270007	EN	05I	LMA	\$15,979.59
2022	4	2467	6860218	No	2023 District 6 Community Engagement	B22MC270007	EN	05I	LMA	\$9.77
2022	4	2468	6870494	No	2023 District 7 Community Engagement	B22MC270007	EN	05I	LMA	\$17,500.05
2022	4	2468	6877445	No	2023 District 7 Community Engagement	B22MC270007	EN	05I	LMA	\$17,499.95
2022	4	2469	6844781	No	2023 District 8 Community Engagement	B22MC270007	EN	05I	LMA	\$27,486.14
2022	4	2469	6877445	No	2023 District 8 Community Engagement	B22MC270007	EN	05I	LMA	\$7,513.86
2022	4	2470	6818600	No	2023 District 11 Community Engagement	B22MC270007	EN	05I	LMA	\$35,000.00
2022	4	2471	6791754	No	2023 District 17 Community Engagement	B22MC270007	EN	05I	LMA	\$8,769.25
2022	4	2471	6818600	No	2023 District 17 Community Engagement	B22MC270007	EN	05I	LMA	\$5,261.55
2022	4	2471	6844781	No	2023 District 17 Community Engagement	B22MC270007	EN	05I	LMA	\$7,015.40
2022	4	2471	6860218	No	2023 District 17 Community Engagement	B22MC270007	EN	05I	LMA	\$5,446.10
								<b>05I</b>	<b>Matrix Code</b>	<b>\$294,093.47</b>
2022	3	2444	6877445	No	2022 Block Nurse Program	B22MC270007	EN	05M	LMC	\$83,000.00
								<b>05M</b>	<b>Matrix Code</b>	<b>\$83,000.00</b>
				<b>No</b>	<b>Activity to prevent, prepare for, and respond to Coronavirus</b>					<b>\$748,093.47</b>
<b>Total</b>										<b>\$748,093.47</b>

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

Plan Year	IDIS Project	IDIS Activity	voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2021	12	2393	6818600	2021 General Admin	21A		\$1,040.00
2021	12	2393	6844781	2021 General Admin	21A		\$2,187.00
2021	12	2393	6860218	2021 General Admin	21A		\$194.04
2021	12	2393	6904964	2021 General Admin	21A		\$829.68
2022	13	2446	6818600	2022 General Administration	21A		\$202,304.44
2022	13	2446	6844781	2022 General Administration	21A		\$646.84
2022	13	2446	6860218	2022 General Administration	21A		\$115,189.84
2022	13	2446	6876741	2022 General Administration	21A		\$1,082.22
2023	3	2491	6860218	2023 General Administration	21A		\$449,890.08
2023	3	2491	6870494	2023 General Administration	21A		\$234,421.57
2023	3	2491	6876741	2023 General Administration	21A		\$771.36
2023	3	2491	6902019	2023 General Administration	21A		\$59,147.86
2023	3	2491	6904964	2023 General Administration	21A		\$604,082.22
					<b>21A</b>	<b>Matrix Code</b>	<b>\$1,671,787.15</b>
<b>Total</b>							<b>\$1,671,787.15</b>

	Office of Community Planning and Development	DATE: 07-15-24
	U.S. Department of Housing and Urban Development	TIME: 9:22
	Integrated Disbursement and Information System	PAGE: 1
	PR26 - CDBG-CV Financial Summary Report	
	ST. PAUL , MN	

**PART I: SUMMARY OF CDBG-CV RESOURCES**

01 CDBG-CV GRANT	6,061,828.00
02 FUNDS RETURNED TO THE LINE-OF-CREDIT	0.00
03 FUNDS RETURNED TO THE LOCAL CDBG ACCOUNT	29,019.50
04 TOTAL CDBG-CV FUNDS AWARDED	6,061,828.00

**PART II: SUMMARY OF CDBG-CV EXPENDITURES**

05 DISBURSEMENTS OTHER THAN SECTION 108 REPAYMENTS AND PLANNING/ADMINISTRATION	5,086,999.66
06 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	311,828.00
07 DISBURSED IN IDIS FOR SECTION 108 REPAYMENTS	0.00
08 TOTAL EXPENDITURES (SUM, LINES 05 - 07)	5,398,827.66
09 UNEXPENDED BALANCE (LINE 04 - LINE8 )	663,000.34

**PART III: LOWMOD BENEFIT FOR THE CDBG-CV GRANT**

10 EXPENDED FOR LOW/MOD HOUSING IN SPECIAL AREAS	0.00
11 EXPENDED FOR LOW/MOD MULTI-UNIT HOUSING	0.00
12 DISBURSED FOR OTHER LOW/MOD ACTIVITIES	5,086,999.66
13 TOTAL LOW/MOD CREDIT (SUM, LINES 10 - 12)	5,086,999.66
14 AMOUNT SUBJECT TO LOW/MOD BENEFIT (LINE 05)	5,086,999.66
15 PERCENT LOW/MOD CREDIT (LINE 13/LINE 14)	100.00%

**PART IV: PUBLIC SERVICE (PS) CALCULATIONS**

16 DISBURSED IN IDIS FOR PUBLIC SERVICES	2,166,767.75
17 CDBG-CV GRANT	6,061,828.00
18 PERCENT OF FUNDS DISBURSED FOR PS ACTIVITIES (LINE 16/LINE 17)	35.74%

**PART V: PLANNING AND ADMINISTRATION (PA) CAP**

19 DISBURSED IN IDIS FOR PLANNING/ADMINISTRATION	311,828.00
20 CDBG-CV GRANT	6,061,828.00
21 PERCENT OF FUNDS DISBURSED FOR PA ACTIVITIES (LINE 19/LINE 20)	5.14%

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

No data returned for this view. This might be because the applied filter excludes all data.

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

No data returned for this view. This might be because the applied filter excludes all data.

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

Plan Year	IDIS Project	IDIS Activity	voucnr Number	Activity Name	matrix Code	National Objective	Drawn Amount
2019	16	2348	6564356	Expanded Meal Access	05W	LMA	\$269,826.86
			6597468	Expanded Meal Access	05W	LMA	\$163,789.14
			6652005	Expanded Meal Access	05W	LMA	\$40,183.02
			6680011	Expanded Meal Access	05W	LMA	\$58,093.94
			6719658	Expanded Meal Access	05W	LMA	\$87,183.13
			6752484	Expanded Meal Access	05W	LMA	\$8,718.34
			6877066	Expanded Meal Access	05W	LMA	\$33,107.04
		2349	6585463	Mobile Library Services	05Z	LMA	\$90,462.00
			6877066	Mobile Library Services	05Z	LMA	\$49.00
		2350	6500682	Library Career Labs	05Z	LMA	\$52,142.39
			6524053	Library Career Labs	05Z	LMA	\$53,326.27
			6564356	Library Career Labs	05Z	LMA	\$41,752.83
			6597468	Library Career Labs	05Z	LMA	\$36,175.16
			6719658	Library Career Labs	05Z	LMA	\$197,247.98
			6778508	Library Career Labs	05Z	LMA	\$31,341.12
		2351	6557364	Library Materials Lockers	05Z	LMA	\$39,480.00
			6564356	Library Materials Lockers	05Z	LMA	\$4,375.00
			6585463	Library Materials Lockers	05Z	LMA	\$39,480.00
			6627074	Library Materials Lockers	05Z	LMA	\$216.00

## **GLOSSARY OF TERMS, ACRONYMS, AND ABBREVIATIONS**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

**LBP** - Lead-Based Paint.

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

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

**LOTH** - Length of Time Homeless.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**SBE - Small Business Enterprise** - a business that meets specific economic criteria and is owned, operated, and controlled by one or more persons.

**Section 3 Program** - requires that recipients of certain HUD financial assistance, to the greatest extent possible, provide training, employment, contracting, and other economic opportunities to low- and very low-income persons, especially recipients of government assistance for housing, and to businesses that provide economic opportunities to low- and very low-income persons.

**Single-family Housing** - A residence which includes conventional stand-alone housing units as well as patio homes, townhomes, duplexes, or structures with up to four units, one of which is occupied by the owner.

**SPPD** - Saint Paul Police Department.

**SPPS** - Saint Paul Public Schools, Independent District #625.

**SRO - Single Room Occupancy** - a residential property that includes multiple single room dwelling units. Each unit is for occupancy by a single eligible individual. The unit need not, but may, contain food preparation or sanitary facilities, or both.

**STAR Funds - Sales Tax Revitalization** - funds are derived from a City of Saint Paul half-cent sales tax levy for capital improvements to further residential, economic, and commercial development.

**Supportive Housing** - Housing that includes planned supportive services.

**TBRA - Tenant-Based Rental Assistance** - a rental subsidy that helps make up the difference between what a renter can afford to pay and the actual rent for a home or apartment.

**TIF - Tax Increment Financing** - a public financing method that is used as a subsidy for redevelopment, infrastructure, and other community-improvement projects.

**TPV - Tenant Protection Vouchers** (also referred to as **Enhanced Vouchers**) - are meant to ensure there is no displacement of low-income residents occurs as a result of various actions resulting in a loss of subsidy assistance. In other words, tenants may be displaced when a property in which the tenant lives is no longer subject to income restrictions, but the tenant does not have a voucher to ensure continued affordability. These tenants would receive a voucher to ensure affordability and protection from potential rent increases.

**Transitional Housing** - a project that is designed to provide housing and appropriate supportive services to homeless persons to facilitate movement to independent living within 24 months.

**VASH - Veterans Affairs Supportive Housing** - combines HUD HCV rental assistance for homeless veterans and their families with case management and clinical services provided by the Department of Veterans Affairs at its medical centers and in the community.

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

**VOP - Vendor Outreach Program** - a City of Saint Paul business assistance program aimed at helping WBE, MBE, and SBE have greater access to contracting opportunities with the city.

**WBE - Woman-owned Business Enterprise** – a business where at least 51% is owned and controlled by a female.