



## CITY OF SAINT PAUL, MINNESOTA CONSOLIDATED PLAN, 2017 ACTION PLAN



This Document includes information required by the U.S. Department of Housing  
and Urban Development for Fiscal Year 2017:  
Community Development Block Grant Program, Home Investment Partnership,  
Emergency Solutions Grant Program



City of Saint Paul  
Planning and Economic Development Department

APPROVED BY CITY COUNCIL RESOLUTION #17-673, 4/26/2017

Annual Action Plan  
2017

1

## **Executive Summary**

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

#### **1. Introduction**

The City of Paul is considered an entitlement community by the United States Department of Housing and Urban Development (HUD). Eligibility for participation as an entitlement community is based on population data provided by the U.S. Census Bureau and metropolitan area delineations published by the Office of Management and Budget. HUD determines the amount of each entitlement grantee's annual funding allocation formula which uses several objective measures of community needs, including the extent of poverty, population, housing overcrowding, age of housing and population growth lag in relationship to other metropolitan areas. The City anticipates receiving \$6,293,101 of Community Development Block Grant (CDBG) funding, \$1,472,699 of HOME Investment Partnership Program (HOME) funding, and \$571,420 of Emergency Solutions Grant (ESG) funding from HUD in 2017. In addition, the City estimates using about \$556,899 in CDBG program income. These estimates are based on the City of Saint Paul receiving the same level of funding from HUD in FY 2017 that was received in FY2016. Should the City of Saint Paul receive less the estimated amount, the City will alter the division of funding in the following manner:

Under the CDBG program, the Administration, Public Service and Clearance activities will be reduced proportionately to the percentage of reduction received from HUD in the formula allocation. The balance of the reduction will then be applied to the Housing Rehabilitation and Economic Development projects. Single family rehabilitation activates under the Housing Rehabilitation project will absorb 50% of the shortfall, while the Economic Development project and Multifamily Rehabilitation activities under the Housing Rehabilitation project will each absorb 25% of the shortfall.

Should the City receive an increase in CDBG funding from the estimated allocation, the City will increase its Administration and Youth Employment Public Service activities, proportionately to the increased level of funding, staying under the 20% and 15% caps respectively. The remaining increase will be split evenly between the Economic Development and Public Facilities projects.

HOME and ESG activities will be reduced or increased in direct proportion to the difference in the actual allocation received from HUD.

This document is the one year Action Plan for the City of Saint Paul, Minnesota, for program year 2017 to be submitted to HUD. The Action Plan includes the City's application for 2017 CDBG funding, which the City uses to invest in housing, public improvements, economic development, public services, and job

creation activities. Saint Paul also receives HOME funds to assist in the provision of long-term, safe and affordable housing, as well as ESG funding, which provides housing opportunities for homeless persons.

## **2. Summarize the objectives and outcomes identified in the Plan**

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

Through the needs and market assessment undertaken through the consolidated planning process, the City of Saint Paul has identified twenty-one priority needs in the Strategic Plan. These priorities include:

1. Preservation of existing affordable rental housing;
2. Development of new affordable rental housing;
3. Housing rehabilitation assistance;
4. Non-housing community development (job training and small business development, youth services, financial planning assistance, renter education, credit repair assistance, and criminal record expungement);
5. Fair housing and housing anti-discrimination efforts;
6. Supportive services to help keep households housed;
7. Tenant and landlord education;
8. Increased homeownership opportunities;
9. Homeless prevention strategies;
10. Individual homeless persons' need assessment;
11. Emergency shelters and transitional housing;
12. Transitions to permanent housing;
13. Public facilities;
14. Public infrastructure;
15. Public service needs;
16. Economic development needs;
17. Planning needs;
18. Lead-based paint abatement plan implementation;
19. Acquisition, demolition, and clearance of property;
20. Property maintenance code enforcement; and
21. Community outreach to underserved populations.

## **3. Evaluation of past performance**

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

The housing needs of low income, special needs, and elderly homeowners, as well as the needs of small, large, elderly, and special needs renter households are listed as high priorities in the 2015-2019 Saint Paul Consolidated Plan. The strategies identified in the housing section of the City's Comprehensive Plan were to preserve and construct affordable housing through partnerships, and retrofit for energy efficiency.

Historically, the City has expended the majority of its funding from the Department of Housing & Urban Development (HUD) on housing activities (primarily for rehabilitation), and it continued to do so in the last program year. During the 2015 program year, all of the City's HOME Investment Partnership Program (HOME) funding, and approximately 95% of the Community Development Block Grant (CDBG) project funding was used for housing related activities. A total of 593 housing units were constructed or completed rehabilitation this year. 93% of this housing work consisted of rehabilitation of existing housing units and 7% was the construction of new affordable units. This total fell short of the proposed 2015 total housing unit goal identified in the 2015-2019 Consolidated Plan, primarily due to a shortfall to the City's projected CDBG and HOME funding amounts in 2015.

The City and its subgrantees provided housing assistance to 61 (17 owner, 44 renter) extremely low income (30% of median) households, 93 (44 owner, 49 renter) very low income (50% of median) households and 166 (76 owner, 90 renter) low income (80% of median) households. A total of 50 Asian households, 177 Black households, 79 White households, and 14 other race households were assisted with housing activities during the program year. 19 of the households were of Hispanic ethnicity.

Housing programs administered by the City were available citywide, to income eligible households. The City provided funding to subgrantees, whose programs were available to income eligible residents residing in the subgrantee service area. These areas included Districts 2 through 9, and 11.

#### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

The City of Saint Paul consulted with a diverse array of public, non-profit and private sector groups throughout the 2017 Consolidated Annual Action Plan process. The following groups were invited to participate in the process:

- City of Saint Paul Departments
- City of Saint Paul Capital Improvement Budget Committee
- City of Saint Paul District Councils (17 independent non-profit organizations)
- City of Saint Paul's Public Housing Agency
- Ramsey County Community and Economic Development
- Ramsey County Continuum of Care
- Ramsey County Department of Public Health



These groups represent a range of interests including:

- St. Paul residentsaffordable housing providerslocal government officesfair housing service providershomeless shelters and providersproviders for elimination of lead-based paint hazardshealth and human service providers, including those focusing on elderly, veterans, homelessness, persons with disabilities and mental illness

The draft plan was posted on the City's website and plans were made available for review at each of the public libraries located throughout the City. Notification of the availability of the draft plan was sent out through the City's Early Notification System (ENS) and was published in the local daily newspaper. The notice included information for persons needing special accommodations and assistance for non-English speaking residents. The City held a public hearing on April 10, 2017 2:00-3:30 PM at City Hall Annex, Room 1405, 25 W 4th Street, Saint Paul, MN 55102.

## **5. Summary of public comments**

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

The City of Saint Paul's citizen participation plan is attached as an exhibit to this plan.

The public comment period ran from March 17, 2017 through April 16, 2017. The City received no additional comments during the public comment period.

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

The public comment period ran from March 17, 2017 through April 16, 2017. No additional comments were received during the public comment period.

## **7. Summary**

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

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

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

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

**Table 1 – Responsible Agencies**

**Narrative (optional)**

PED was established in 1977, and is responsible for the planning, housing and economic activities throughout the City. Our mission is to actively create opportunities and encourage investment for the benefit of Saint Paul residents and businesses, which preserve, grow and sustain downtown and the city's diverse neighborhoods. We have 75.3 full-time equivalent employees that work on our four department teams – Administration & Finance, Economic Development, Housing and Planning (which includes Heritage Preservation and Zoning). The department also staffs the Saint Paul Housing and Redevelopment Authority (HRA) with a development budget of \$50 million. PED also manages a \$9.3 million annual budget for HUD grants and a \$32.2 million annual budget for the City's Sales Tax Revitalization (STAR) program. We finance affordable, and some market rate, housing development, implement economic development strategies including promoting commercial corridors, business retention and recruitment, small business lending, home rehabilitation lending and mortgage foreclosure prevention programs, emergency shelter grant programs, tax increment and bond financing programs, Neighborhood and Cultural Sales Tax loan and grant programs, and manage a \$86.9 million Parking and Transit program.

**Consolidated Plan Public Contact Information**

Annual Action Plan  
2017

Question and/or comments on the Consolidated Plan may be directed to the following PED staff:

- Joe Collins: 651-266-6020
- Beth Ulrich: 651-266-6689
- Tchu Yajh: 651-266-6592

Written comments should be sent to the following address:

- Beth Ulrich
- beth.ulrich@ci.stpaul.mn.us
- Department of Planning and Economic Development
- 1400 City Hall Annex, 25 West Fourth Street
- Saint Paul, MN 55102

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

### **1. Introduction**

The City of Saint Paul consulted with numerous organizations, local government agencies, and City departments throughout the consolidated planning process. The City held several community meetings and requested information via phone, e-mail and face to face interviews with organizations. The process also included the review of additional research documentation. Throughout the year, the City's Housing staff consults with the Saint Paul Public Housing Agency, community housing development corporations, for-profit housing providers and non-profit housing providers to finance, construct and preserve affordable housing developments citywide.

The City's ESG staff also works with the Minnesota Housing Finance Agency, the Ramsey County Continuum of Care (members include staff from State and County Correctional departments), community agencies that serve at-risk of being homeless residents, emergency shelters, transitional housing providers, affordable housing providers, and community agencies that assist homeless residents challenged with mental illness. As a result, the City's ESG Program is coordinated with HUD-funded programs, such as Ramsey County Continuum of Care (COC), and state programs, such as the Family Homelessness Prevention Assistance Program (FHPAP).

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

The City of Saint Paul has strong relationships with numerous organizations, local government agencies, and City departments. We consult with these organizations on an on-going basis. Specifically, throughout the year, the City's Housing staff consulted with Saint Paul Public Housing Agency, community housing development corporations, and assisted housing providers to develop affordable housing developments citywide. The City's ESG staff worked with mental health and community service providers to assist homeless residents challenged with mental illness. Moreover, the City owns the Saint Paul Residence (120 supportive housing units - using the Housing First model). On behalf of the City, Catholic Charities operates St. Paul Residence in order to serve at risk of being homeless residents, formerly homeless residents, and chronically-inebriated homeless residents - many of these residents may have physical or mental health issues.



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

The City's Emergency Solutions Grant ("ESG") Program staff continually consults with the Ramsey County Continuum of Care (COC) Coordinator in addition to attending the Ramsey County COC Governing Board monthly meetings and Ramsey County Family Homeless Prevention Assistance Program (FHPAP) monthly meetings. The City ESG staff and Ramsey County COC Coordinator also review all ESG, COC, and FHPAP funding allocations and service delivery programs. City staff works with the Ramsey County COC Governing Board and the Ramsey County FHPAP committee to discuss service priorities as established for Ramsey County COC, FHPAP, and the City's Consolidated Plan with its ESG focus. In accordance with the Ramsey County COC Governing Board, the highest service priority is established to assist homeless families (with school age children), second highest priority is to assist homeless unaccompanied youth, and the third highest priority is to assist residents with mental illness. The City's ESG also funds street outreach and homelessness prevention services to assist homeless veterans.

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

The City's ESG Program staff works with the Ramsey County Continuum of Care (COC) Coordinator and the COC Governing Board members. Furthermore, in consultation with Ramsey County COC, ESG funding is allocated to programs that 1) promote a comprehensive delivery of homelessness services; 2) assist underserved communities; 3) provide services as needed to achieve the goals of the Ramsey County COC, Ramsey County FHPAP, and ESG, 4) reduce the number of emergency shelter residents at the Dorothy Day Center, and 5) address city concerns while meeting HUD's national housing objectives. Furthermore, pursuant to Ramsey County COC guidance, the highest service priority is established to assist homeless families (with school age children), second highest priority is to assist homeless unaccompanied youth, and the third highest priority is to assist residents with mental illness. Additionally, ESG funding allocations are reviewed by the Ramsey County COC Coordinator, and the ESG Program is discussed with Ramsey County COC Governing Board committee members and community agencies. During August 2017, the City will present the 2017 ESG Budget Allocation to the Ramsey County COC Governing Board for a community discussion about the proposed ESG budget allocations for each ESG program component - emergency shelter, street outreach, homelessness prevention, rapid rehousing, and HMIS. Establishing the proposed 2017 ESG budget allocations

recognizes the need for additional emergency shelter beds as well as the unfunded HUD mandated cost for Coordinated Entry services.

ESG staff and Ramsey County COC staff are working together to establish performance standards for the ESG, COC and FHPAP programs. Currently, Ramsey County COC staff are developing performance matrices that will apply to COC and ESG funded activities. Additionally, project outcomes are being discussed with ESG/COC/FHAP service providers.

During January, 2017, the COC Coordinator and the City's ESG staff conducted a HUD program-related training for COC, ESG, and FHPAP providers. Later, the COC Coordinator and ESG staff will provide additional training on the established performance matrix and project outcomes. At the same time, the staff from the City's ESG, Ramsey County COC, and Institute for Community Alliance (ICA) (HMIS administrator) are considering funding allocations to develop a more responsive HMIS system.

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

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Ramsey County Human Services
	<b>Agency/Group/Organization Type</b>	Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City's Emergency Solutions Grant (ESG) staff consults with the Ramsey County Continuum of Care (COC) Coordinator as well as ESG staff attends monthly Ramsey County COC and FHPAP meetings to implement comprehensive services that assist homeless and at-risk of being homeless residents. An anticipated outcome is ESG staff and Ramsey County COC Governing Board recommend funding allocations for COC and FHPAP services Other anticipated outcomes are that City and County staff are developing ESG, FHPAP, and COC program evaluations and additional service provider staff training.
2	<b>Agency/Group/Organization</b>	MINNESOTA HOME OWNERSHIP CENTER
	<b>Agency/Group/Organization Type</b>	Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Home Ownership Programs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City's housing staff participates with the Minnesota Home Ownership Center ("MNHOC") to implement home ownership programs such as home buying counseling, mortgage foreclosure prevention counseling, and home buying initiative for underserved communities. The anticipated outcome is the continual development of multi-lingual and multi-cultural homeownership classes and mortgage foreclosure counseling services. Additionally, City staff participates with MNHOC's Home Ownership Center's Home Ownership Alliance. An anticipated outcome are long-term homeownership strategies that may reduce the racial disparity in homeownership.
3	<b>Agency/Group/Organization</b>	Metropolitan Fair Housing Implementation Council
	<b>Agency/Group/Organization Type</b>	Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Furthering Fair Housing Initiatives
4	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	PED staff participates on the Fair Housing Implementation Council to develop initiatives that further fair housing in the metro area. Currently, the anticipated outcome is an Addendum to the Fair Housing Analysis of Impediments that gives guidance to possible funding for fair housing initiatives.
	<b>Agency/Group/Organization</b>	RAMSEY COUNTY
	<b>Agency/Group/Organization Type</b>	Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy



	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City consults with Ramsey County Community and Economic Development staff in the areas of employment and training initiatives, regional fair housing initiatives, affordable housing development, and public service programs addressing public health services. Since the City and County's public health functions merged through a joint powers agreement, an anticipated outcome is that County provides comments on the City's consolidated draft action plan.
5	<b>Agency/Group/Organization</b>	DISTRICT COUNCILS
	<b>Agency/Group/Organization Type</b>	Planning organization Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Seventeen separate 501(c)3 organizations make up the collective district councils. The City contracts with these organizations to provide planning and advising on the physical, economic, and social development of their areas; identifying needs; and initiating community programs. Each district council selects 6 residents to participate in the CIB Process of recommending funding for projects. The district councils are also requested to provide additional input as an organization on the project proposals during the selection process. The expected outcome of the consultation is to receive citizen participation in the plan and project selection process.
6	<b>Agency/Group/Organization</b>	St Paul Public Housing Agency
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Throughout the fiscal year, the City and PHA representative participate on the Ramsey County Family Homelessness Prevention Assistance Program Committee and other housing initiatives. The City and Saint Paul PHA have a working partnership which recognizes the challenges faced by the Saint Paul PHA administration and PHA residents. An anticipated outcome is that Saint Paul PHA's Project-Based Section 8 Housing Choice Vouchers assist eligible affordable housing projects financed by the City.
7	<b>Agency/Group/Organization</b>	Independent School District #625
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City ESG staff and the Saint Paul Public Schools Title 1 Coordinator are committee members of the Ramsey County COC Governing Board members and Ramsey County Family Homelessness Prevention Assistance Program. The City's ESG staff also consults with Saint Paul Public Schools Title 1 Program staff to discuss the needs of homeless students of the Saint Paul Public Schools, including the needs of students aging out of the foster care system. An possible anticipated outcome is more shelter beds for school-aged homeless children contingent upon securing additional funding.

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

No specific agency types were intentionally left out of the consolidated plan process.

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

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Ramsey County Human Services	The City's ESG and Ramsey County COC strategic priorities are similar to the goals of each plan.
Thrive MSP 2040	Metropolitan Council	The City's strategic priorities for anti-poverty measures, fair housing, equal economic opportunity, business development, economic development and job creation are in line with the strategies identified in the Metropolitan Council's Thrive MSP 2040 plan document.
Saint Paul Comprehensive Plan and addenda	City of Saint Paul	The City's Comprehensive Plan is in line with the City's strategic priorities for HUD-funded activities.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

## **AP-12 Participation – 91.105, 91.200(c)**

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

The most significant citizen participation related to the annual allocation of CDBG funds occurs during the Capital Improvement Budget process. The CIB committee and its task forces are comprised of Saint Paul residents. These residents are charged with hearing project proposal presentations, scoring projects and offering comments. The proposals are sent to the 17 district council organizations, representing every neighborhood in Saint Paul, for review and prioritization. These recommendations are presented to the Mayor and Council and are the basis for the selection of projects and programs funded with CDBG funds.

The City followed its established citizen participation plan which is attached as an exhibit to this 2017 Annual Action Plan.



### Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Meeting	Non-targeted/broad community	18 members of the Capital Improvement Budget Committee	Recommendations were made on the distribution of the CDBG funds for program years 2017.		<a href="https://www.stpaul.gov/departments/mayors-office/committees-boards-and-commissions/capital-improvement-budget-cib-committee">https://www.stpaul.gov/departments/mayors-office/committees-boards-and-commissions/capital-improvement-budget-cib-committee</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Meeting	Homeless	Ramsey COC Governing Board and the Ramsey County FHPAP Committee comprised of community service agencies and some former homeless residents	Throughout the year, provides input and direction on strategies, program funding, and program development for services provided to homeless residents		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
3	Public Hearing	Non-targeted/broad community	Public Hearing was held April 10, 2016 2:00 - 3:30 PM at 15 W Kellogg Blvd, Room 42, Saint Paul, MN 55102	No comments were received at the public hearing.	No comments were received at the public hearing.	
4	Internet Outreach	Non-targeted/broad community	The plan is posted on the City's website.	No comments were received in response to the posting.	No comments were received in response to the posting.	<a href="https://www.stpaul.gov/sites/default/files/Media%20Root/Planning%20%26%20Economic%20Development/2017%20ConsolidatedPlan%20Draft.pdf">https://www.stpaul.gov/sites/default/files/Media%20Root/Planning%20%26%20Economic%20Development/2017%20ConsolidatedPlan%20Draft.pdf</a>

Table 4 – Citizen Participation Outreach





## Expected Resources

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

#### Introduction

All proposed project amounts stated in the FY 2017 consolidated plan are estimates based on the City of Saint Paul receiving the same level of funding from HUD in FY 2017 that was received in FY2016. Should the City of Saint Paul receive less the estimated amount, the City will alter the division of funding in the following manner:

Under the CDBG program, the Administration, Public Service and Clearance activities will be reduced proportionately to the percentage of reduction received from HUD in the formula allocation. The balance of the reduction will then be applied to the Housing Rehabilitation and Economic Development projects. Single family rehabilitation activates under the Housing Rehabilitation project will absorb 50% of the shortfall, while the Economic Development project and Multifamily Rehabilitation activities under the Housing Rehabilitation project will each absorb 25% of the shortfall.

Should the City receive an increase in CDBG funding from the estimated allocation, the City will increase its Administrative and Youth Employment Public Service activities, proportionately to the increased level of funding, staying under the 20% and 15% caps respectively. The remaining increase will be split evenly between the Economic Development and Public Facilities projects.

HOME and ESG activities will be reduced or increased in direct proportion to the difference in the actual allocation received from HUD.

#### Anticipated Resources

Program	Source	Uses of Funds	Expected Amount Available Year 1	Expected	Narrative Description
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	of Funds	Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services			6,850,000	12,650,000	Expected amount available for the remainder of consolidated plan assumes steady funding for the remaining 2 years.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	556,899	0	2,807,242	5,334,543	Expected amount available for remainder of consolidated plan assumes a small decrease for 2018 and assumes similar funding for the remaining year.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	571,420	0	0	571,420	1,147,500	Expected amount available for remainder of consolidated plan assumes steady funding for the remaining 2 years.

Table 5 - Expected Resources – Priority Table

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

HUD requires that all participating jurisdictions match no less than 25 cents for each dollar of HOME funds spent on affordable housing. The City of Saint Paul receives a match reduction of 50%. The City ended the 2016 program year with some excess match and will continue to leverage other private and public funds in the development of HOME funded affordable housing and accumulate additional match.

ESG has a dollar for dollar match requirement. Historically the City's ESG subgrantees have exceeded the match requirement. The City requires its subgrantees to meet the annual match requirements as a condition of the grant agreements.

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

## **Discussion**

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Homeless Prevention	2015	2019	Homeless	Citywide	Homeless prevention strategies Assessing individual homeless persons' needs Emergency shelters and transitional housing	ESG: \$571,420	Tenant-based rental assistance / Rapid Rehousing: 100 Households Assisted Homeless Person Overnight Shelter: 2700 Persons Assisted Homelessness Prevention: 200 Persons Assisted
3	Housing Rehabilitation	2015	2019	Affordable Housing	Citywide	Preservation of Affordable Rental Housing Housing rehabilitation assistance Lead based paint	CDBG: \$3,194,000 HOME: \$772,699	Rental units rehabilitated: 38 Household Housing Unit Homeowner Housing Rehabilitated: 100 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Public Services	2015	2019	Non-Housing Community Development	Citywide	Non-housing community development Fair Housing and housing discrimination. Public service needs Community outreach	CDBG: \$252,000	Public service activities other than Low/Moderate Income Housing Benefit: 2000 Persons Assisted
5	Community Engagement	2015	2019	Non-Housing Community Development Crime prevention	Citywide	Non-housing community development Public service needs Community outreach	CDBG: \$345,000	Public service activities other than Low/Moderate Income Housing Benefit: 121000 Persons Assisted
6	Youth Employment	2015	2019	Non-Housing Community Development Employment	Citywide	Non-housing community development Public service needs	CDBG: \$371,000	Public service activities other than Low/Moderate Income Housing Benefit: 400 Persons Assisted
7	Economic Development	2015	2019	Non-Housing Community Development	Citywide	Economic development needs	CDBG: \$525,000	Facade treatment/business building rehabilitation: 3 Business Jobs created/retained: 2 Jobs Businesses assisted: 3 Businesses Assisted
8	Remediation of Substandard Properties	2015	2019	Non-Housing Community Development	Citywide	Acquisition, demolition, clearance of property	CDBG: \$500,000	Buildings Demolished: 16 Buildings



Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	Public Improvements	2015	2019	Public facilities	Citywide	Non-housing community development Public facilities	CDBG: \$275,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2500 Persons Assisted
32	Development of New Housing	2015	2019	Affordable Housing	Citywide	Affordable Rental Housing Increase homeownership opportunities	HOME: \$700,000	Rental units constructed: 15 Household Housing Unit Homeowner Housing Added: 2 Household Housing Unit

Table 6 – Goals Summary

## Goal Descriptions

1	Goal Name	Homeless Prevention
	Goal Description	
3	Goal Name	Housing Rehabilitation
	Goal Description	
4	Goal Name	Public Services
	Goal Description	
5	Goal Name	Community Engagement
	Goal Description	

6	Goal Name	Youth Employment
	Goal Description	
7	Goal Name	Economic Development
	Goal Description	
8	Goal Name	Remediation of Substandard Properties
	Goal Description	
9	Goal Name	Public Improvements
	Goal Description	
32	Goal Name	Development of New Housing
	Goal Description	

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

The project summary information provides a description and funding amount for each of the projects the City plans to undertake in HUD Fiscal Year 2017 with CDBG, HOME, and ESG funding. The Capital Improvement Budget Committee recommended the FY2017 capital projects through the 2016-2017 capital improvement budget process.

#### Projects

#	Project Name
12	Marydale Play Area
13	Acquisition Activities
14	Disposition Activities
15	Clearance Activities
16	Public Services
17	Housing Construction
18	Single Unit Rehabilitation
19	Multi-Unit Rehabilitation
20	Commercial Corridor and Citywide Economic Development
21	Emergency Solutions Grant
22	HOME Program
23	Administration and Planning

Table 7 - Project Information

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

Capital project priorities were recommended by the Capital Improvement Budget Committee. Recommendations were based upon consolidated plan priority needs and goals, strength of proposals, staff rankings, public input and available resources. The primary obstacle to addressing underserved needs continues to be the reduction in funding available and the increasing demand for services and funding needs.



**AP-38 Project Summary**  
**Project Summary Information**

Annual Action Plan  
2017

31

1	<b>Project Name</b>	Marydale Play Area
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Improvements
	<b>Needs Addressed</b>	Public facilities
	<b>Funding</b>	CDBG: \$275,000
	<b>Description</b>	ADA improvements and replacement of play equipment at Marydale park
	<b>Target Date</b>	12/29/2017
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The play area will serve approximately 20,190 residents of which 11,465 are low-mod income.
	<b>Location Description</b>	The service area of the play area is 1/2 mile of radius from 542 W Maryland Ave, Saint Paul, MN
	<b>Planned Activities</b>	Project will renovate the play area with replacement and addition of play equipment that meets CPSC and ADA guidelines.
2	<b>Project Name</b>	Acquisition Activities
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Remediation of Substandard Properties
	<b>Needs Addressed</b>	Acquisition, demolition, clearance of property
	<b>Funding</b>	CDBG: \$75,000
	<b>Description</b>	Project for CDBG acquisition activities.
	<b>Target Date</b>	12/31/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This activity will fund the acquisition, demolition or rehabilitation of one substandard building.
	<b>Location Description</b>	
	<b>Planned Activities</b>	Acquisition, demolition and remediation costs
3	<b>Project Name</b>	Disposition Activities
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Remediation of Substandard Properties



	<b>Needs Addressed</b>	Acquisition, demolition, clearance of property
	<b>Funding</b>	CDBG: \$100,000
	<b>Description</b>	Project for CDBG disposition activities.
	<b>Target Date</b>	12/31/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This activity will be used to fund ongoing maintenance and holding costs of properties acquired for redevelopment with CDBG funds.
	<b>Location Description</b>	
	<b>Planned Activities</b>	Activity is for management of property acquired for affordable housing activities or businesses who serve low/mod populations.
4	<b>Project Name</b>	Clearance Activities
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Remediation of Substandard Properties
	<b>Needs Addressed</b>	Code enforcement
	<b>Funding</b>	CDBG: \$400,000
	<b>Description</b>	Slum/blight Activities
	<b>Target Date</b>	12/31/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This activity will demolish approximately 16 buildings in low mod areas.
	<b>Location Description</b>	
	<b>Planned Activities</b>	Slum/blight Activities
5	<b>Project Name</b>	Public Services
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Services Community Engagement Youth Employment

	<b>Needs Addressed</b>	Non-housing community development Fair Housing and housing discrimination. Emergency shelters and transitional housing Public service needs Community outreach
	<b>Funding</b>	CDBG: \$968,000
	<b>Description</b>	Project for CDBG Public Service Activities
	<b>Target Date</b>	12/31/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 2000 low-mod persons will be assisted with these public service activities.
	<b>Location Description</b>	
	<b>Planned Activities</b>	Public service activities to include fair housing activities, community engagement, domestic violence prevention, criminal restorative justice, health care, employment training, conflict resolution, and emergency shelter.
6	<b>Project Name</b>	Housing Construction
	<b>Target Area</b>	
	<b>Goals Supported</b>	Development of New Housing
	<b>Needs Addressed</b>	Increase homeownership opportunities
	<b>Funding</b>	:
	<b>Description</b>	Construction of New Housing Units
	<b>Target Date</b>	12/31/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The individual projects using HOME funds have not been selected yet. We estimate funding should assist at least 6 households
	<b>Location Description</b>	
	<b>Planned Activities</b>	Construction of new housing; may include acquisition, demolition or relocation.
7	<b>Project Name</b>	Single Unit Rehabilitation
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Housing Rehabilitation

	<b>Needs Addressed</b>	Housing rehabilitation assistance Lead based paint
	<b>Funding</b>	CDBG: \$2,547,000
	<b>Description</b>	Project for single unit rehabilitation activities.
	<b>Target Date</b>	12/31/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 100 low-mod families will be assisted by the housing rehab loan programs.
	<b>Location Description</b>	
	<b>Planned Activities</b>	
8	<b>Project Name</b>	Multi-Unit Rehabilitation
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Housing Rehabilitation
	<b>Needs Addressed</b>	Preservation of Affordable Rental Housing Lead based paint
	<b>Funding</b>	CDBG: \$572,000
	<b>Description</b>	Project for multi-unit rehabilitation activities.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 38 low-mod households will be assisted under this activity
	<b>Location Description</b>	
9	<b>Planned Activities</b>	Multi-unit rehabilitation, including acquisition
	<b>Project Name</b>	Commercial Corridor and Citywide Economic Development
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Economic Development
	<b>Needs Addressed</b>	Economic development needs
	<b>Funding</b>	CDBG: \$525,000
	<b>Description</b>	Activities to assist businesses with expansion, property acquisition, rehabilitation, energy conservation improvements, leasehold improvements and development citywide.

	<b>Target Date</b>	12/31/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 4 business will be assisted that serve low-mod populations and 2 businesses will be assisted that create jobs for low-mod persons.
	<b>Location Description</b>	
	<b>Planned Activities</b>	
<b>10</b>	<b>Project Name</b>	Emergency Solutions Grant
	<b>Target Area</b>	
	<b>Goals Supported</b>	Homeless Prevention
	<b>Needs Addressed</b>	Homeless prevention strategies Assessing individual homeless persons' needs Emergency shelters and transitional housing Community outreach
	<b>Funding</b>	ESG: \$571,420
	<b>Description</b>	Activities to include homeless prevention, operating costs of shelters, essential services, street outreach, rapid rehousing, and ESG administration. Emergency shelter operations funds and street outreach funds will be less than 60% of ESG funding award.
	<b>Target Date</b>	12/31/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 3000 homeless persons will receive shelter under this activity, and approximately 800 at-risk of being homeless persons will be assisted with homelessness prevention assistance.
	<b>Location Description</b>	
	<b>Planned Activities</b>	Activities to include homeless prevention, operating costs of shelters, essential services, street outreach, rapid rehousing, and ESG administration.
<b>11</b>	<b>Project Name</b>	HOME Program
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Development of New Housing
	<b>Needs Addressed</b>	Affordable Rental Housing
	<b>Funding</b>	HOME: \$1,472,699

	<b>Description</b>	The HOME Program funding may be used for CHDO development and operating activities will meet or exceed 15% CHDO set-aside, City projects, administration, and subrecipient projects. Activities may include single family and multi-family rehabilitation and development. The HOME match requirement will be met with excess match from previous years, as well as match leveraged from new projects. Proposals for HOME funding are accepted throughout the year, and affirmative marketing is required (the MHFA Fair Housing Marketing Plan is used).
	<b>Target Date</b>	12/31/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Projects have not yet been selected under the HOME program. We estimate the amount of funding provided should assist 32 low-mod households.
	<b>Location Description</b>	
	<b>Planned Activities</b>	
12	<b>Project Name</b>	Administration and Planning
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Community Engagement
	<b>Needs Addressed</b>	Planning needs
	<b>Funding</b>	CDBG: \$1,388,000
	<b>Description</b>	Funding for the management, coordination, oversight, and monitoring of the CDBG program, and for costs included in the City's approved Indirect Cost Plan. Funding for planning activities in CDBG eligible areas of the City, as well as environmental and historic reviews of HUD funded projects. Funding for costs included in the City's approved Indirect Cost Plan.
	<b>Target Date</b>	12/31/2018
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This activity is for planning and Administration and has no direct benefit to persons.
	<b>Location Description</b>	
	<b>Planned Activities</b>	

## **AP-50 Geographic Distribution – 91.220(f)**

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

None of the 2016 activities have an address specific location. All of the activities described in the Action Plan are programs which are available citywide, or have service areas that include one or more neighborhoods (districts) in the City.

A map which shows the areas of the City with at least 51% low/moderate income persons is titled as CDBG eligible block groups and tracts and included in the Appendix. All activities providing an area benefit being carried out in 2016 will have a service area that is located primarily in a shaded portion of the map.

Activities carried out by the City which provide a direct benefit (primarily housing activities) are available citywide to income eligible households, while direct benefit activities carried out by subgrantees are available to income eligible households located in the neighborhoods served by the subgrantee. Many of the subgrantees receiving CDBG funds are located in the Inspiring Communities (formerly known as Invest Saint Paul) initiative priority areas. The City will spend a significant portion of its CDBG and HOME funding on activities located in these areas.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Citywide	100

**Table 8 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

By allocating investments city-wide geographically, the City of Saint Paul is working to prevent additional concentrations of low income and minority populations through targeted affordable housing projects, as well as to expand access to opportunity to low- and moderate- income residents city-wide.

### **Discussion**



## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	32
Special-Needs	0
Total	32

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	32
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	32

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

#### Discussion

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

Saint Paul PHA owns and manages 4,262 public housing units and administers 4,664 Housing Choice Vouchers (as of 2/2017), including 100 Family Unification Program vouchers, 117 Disability vouchers, 81 Section 8 Mod rehab SRO vouchers, and 176 Veterans Affairs Supportive Housing (VASH) vouchers. The PHAS has allocated 515 Housing Choice Vouchers for use as project-based vouchers; and more than half of those (327) are in “supportive housing” projects.

The Agency Plan for Saint Paul PHA’s next Fiscal Year, beginning April 1, 2017 is available on the PHA website at <http://www.stpaulpha.org/forms/Draft%20Plan%20102016.doc>

Saint Paul PHA has maintained its “High Performer” status under HUD’s Public Housing Assessment System (PHAS) for 26 consecutive years. The PHA does not administer HOPE VI activities or Mixed-Finance Modernization and Development.

Saint Paul PHA has also maintained its “High Performer” status under HUD’s Section 8 Management Assessment Program for 15 consecutive years. Saint Paul PHA successfully implements and administers current agreements for Project-Based Vouchers (PBV); including PBV(s) in supportive housing that supports the State of Minnesota’s Business Plan to End Long-Term Homelessness.

Saint Paul PHA will continue to advocate for full funding and program reform while preparing contingency plans for possible budgetary cuts in federal funding.

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

**Public Housing:** Using its Capital Funding Program/Replacement Housing Factor funding supplemented by a grant and long-term loan from the Minnesota Housing Finance Agency, Saint Paul PHA has expanded its public housing by constructing six new units at Roosevelt Townhomes (2014); four new units at Mt. Airy Homes (completed 2015), and 12 new units at McDonough Homes (completed November 2016). Phase III of Dunedin Terrace Modernization Plan is scheduled for 2017. Where possible, Saint Paul PHA is converting hi-rise building space from non-dwelling uses to apartments for eligible residents.

Saint Paul PHA’s Capital Fund Program renovates public housing properties by financing capital improvements that promote fire safety and life safety while preserving the assets. Saint Paul PHA will also maintain high quality buildings by utilizing “green sustainable” design principles that conserve

energy and water usage.

**Section 8 Housing Choice Voucher Program:** Saint Paul PHA will maintain high utilization of vouchers without exceeding authorized limits. Saint Paul PHA will administer current agreements for Project-Based Vouchers (PBV), including PBVs for supportive housing developments that support Minnesota's Plan to End Long-Term Homelessness. Additionally, Saint Paul PHA renews expiring PBV contracts at successful projects. In 2017, the PHA is engaging community stakeholders in discussions to consider whether more Housing Choice Vouchers should be offered for PBV use, and if so, what selection criteria are appropriate.

Saint Paul PHA has maintained full utilization of its 4,664 authorized vouchers. Its Section 8 waiting list opened for one week for new applications in September, and it has been closed for new applications since then.

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

Since 1999, the Saint Paul Public Housing Agency (PHA) Board of Commissioners has established the PHA's Resident Advisory Board (RAB) with membership to be comprised of:

- All members of the Hi-Rise Presidents Council (Presidents -16 Hi-Rise buildings).
- All members of the Family Residents' City-Wide Residents Council (16 members, including the four officers from each of the four family housing developments).
- Section 8/Housing Choice Voucher representatives who volunteered for the RAB in response to mailings and flyers in the Rental Office.
- Two PHA Commissioners are residents of public housing: one Commissioner represents the elderly hi-rise residents and one Commissioner represents family residents.

Resident Advisory Board membership fluctuates due to changes in Resident Council officers, as PHA residents move out of public housing or leave the Housing Choice Voucher program, etc. Some public housing resident-leaders who are not currently members of the Presidents Council or City-Wide Resident Council actively participate in the RAB meetings. RAB meeting agendas are sent to all RAB members and Southern Minnesota Regional Legal Services, Inc. (SMRLS).

During the year, the Saint Paul PHA Senior Management meets with members of the Resident Advisory Board (including the Hi-Rise President Council and the Family Residents City-Wide Resident Council) to discuss significant PHA policy changes, the PHA Annual Plan, and PHA Capital Improvements. Saint Paul PHA actively encourages discussions about planning capital improvements and PHA policies. The RAP supported renewing current contracts for Project-Based Housing Choice Vouchers (PBV) and offering a limited number of additional PBVs. Additionally, Saint Paul PHA's Resident Initiative Department and the Resident Councils work together to form new partnerships with community service

agencies.

To promote economic opportunities, Saint Paul PHA participates, to the greatest extent possible, with the Section 3 program – by hiring qualified PHA residents and qualified Section 3 businesses and including Section 3 requirements in all contracts.

The Saint Paul PHA has no current plans to implement a Voucher Homeownership Program, but may consider such an option in the future. For 25 years, Saint Paul PHA operated a successful homeownership program (not using Section 8 vouchers) in conjunction with the Family Housing Fund and Thompson Associates. When the program ended in 2014, almost 300 families from public housing and Section 8 had purchased their own homes.

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

**Not applicable.** In 2016, Saint Paul PHA receive HUD’s “High Performer” rating for the 26th consecutive year under HUD’s “Public Housing Management Assessment Program” (PHAS). Saint Paul PHA also maintains a HUD “High Performer” rating under HUD’s Section 8 Management Assessment Program (SEMAP).

**Discussion**

As previously stated, Saint Paul PHA has achieved High Performer status for both its Public Housing and Section 8 Housing Choice Voucher Program. That said, Saint Paul PHA has a continual need for stable federal funding to maintain its high standards, such that Saint Paul PHA will continue to advocate for full funding and program reform while preparing contingency plans for possible federal funding cuts.

At this time, Saint Paul PHA has no current plans for large-scale conversions of public housing to Section 8 or other forms of assisted housing. If Congress and HUD continue to under fund the Public Housing Operating Fund and Capital Fund, the PHA may consider selling additional scattered site homes and/or converting other public housing units to Section 8 tenant-based or project-based assistance. Staff has previously discussed this option with the Resident Advisory Board which expressed general support. Before taking such a course of action, the Saint Paul PHA would reconvene the Resident Advisory Board

to discuss any proposed changes and seek community input.

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

### **Introduction**

The City of Saint Paul proactively addresses the problems of homelessness in numerous ways. Most important, the City has strong working partnerships with Ramsey County Continuum of Care and service providers to establish a coordinated system that serves homeless and "at-risk of being homeless" individuals, homeless families, and homeless youth. During 2017, the City will work closely with the Ramsey County Continuum of Care Coordinator (COC) and 18+ community agencies to support comprehensive homelessness prevention delivery services that assists homeless single adults, homeless families, homeless veterans, and homeless unaccompanied youth. In partnership with the Ramsey County COC, the City's ESG Program also responds to underserved homeless populations, such as new refugee families and homeless veterans. Additionally, the City owns the Saint Paul Residence (120 units) at which Catholic Charities serves sixty (60) chronically-inebriated single adults (using a Housing First model) and sixty (60) at-risk of being homeless residents.

The City also supports innovative programs that serve homeless residents with mental health illness. As an example, the Saint Paul Police Department works with Listening House (a day drop-in center for homeless adults) and Radian Health (case management/street outreach to homeless adults with mental illness) to support police services that are responsive to homeless residents with mental health illness. The Police Department and Listening House also co-chair the Police-Downtown Community Homeless Forum to address the needs of downtown homeless residents. During 2016, the City, Minnesota Housing, and Catholic Charities built the Dorothy Day Center-Higher Ground facility with 280 shelter beds and 193 units of permanent supportive housing. (Occupancy - January 2017.)

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

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

In Saint Paul, outreach services to homeless persons (especially unsheltered persons) with assessment of their needs are provided as follows:

**People Inc.'s Metropolitan Homeless Street Outreach Program (MHSOP)** has an ESG grant for street outreach services to unsheltered homeless adults who experience mental illness. MHSOP services include providing street outreach, basic survival gear, and assistance in stabilizing mental illness symptoms, benefit assistance, and housing placement, including access to Ramsey County Group Residential Housing Program for stable housing.



**Radias Health's ACCESS Program's** outreach and case management services assist homeless adults with serious and persistent mental illness and substance abuse disorders. The ACCESS staff visit homeless shelters and drop-in centers, and Radias Health also has a ESG grant for its Police-Homeless Outreach Program.

**Coordinated Access to Housing and Shelter (CAHS)** conducts intake assessments to determine the most appropriate referral for homeless families seeking emergency shelter.

**Street Outreach to Homeless Veterans** will be provided by People Inc. for Minnesota Assistance Council for Veterans (MAC-V) Supportive Services for Veteran Families Program (funded by US Department of Veterans Affairs and the City's ESG program). Street outreach services to homeless veterans occurs in emergency shelters and places where homeless veterans congregate.

**Community Resource Outreach Project** offers weekly outreach to homeless residents who can access community referrals for community resources in the stable, quiet environment of the Saint Paul Central Library.

**Streetworks** – Collaborative of community agencies provide street outreach services to homeless youth, including street outreach performed by Face to Face Health and Counseling Services' SafeZone program.

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

**Emergency Solutions Grant (ESG).** The City's ESG partially funds emergency shelters, transitional housing services, street outreach to homeless residents, homelessness prevention, and rapid rehousing programs that assist housing needs of homeless persons. Saint Paul allocates its ESG funding after review by the City staff in consultation with the Ramsey County Continuum of Care Coordinator for final approval by the City Council.

**Emergency Shelter.** The City's ESG funds the shelter operations of the Dorothy Day Center (emergency shelter-adults), Family Service Center (emergency shelter-families), Lutheran Social Services Safe House (emergency shelter-youth), Salvation Army Booth Brown House, (emergency shelter-homeless youth), Interfaithaction (emergency shelter-families), Listening House (drop in center for homeless adults) and The Family Place (day-drop-in center for homeless families).

**Rapid Rehousing.** The City allocates ESG funds for rapid rehousing services for homeless adults currently staying at the Dorothy Day Center Emergency Shelter, rapid rehousing services for homeless families staying at the YWCA Saint Paul's housing, rapid rehousing services for homeless single adults staying at Theresa Living Center, and rapid rehousing services provided by SafeZone for homeless youth.

**Transitional housing.** The City's ESG funds partially pay operating funds for transitional housing

services such as the YWCA St. Paul's transitional housing and Theresa Living Center's transitional housing.

**Dorothy Day Center ReVision.** In 2016, City staff worked with Catholic Charities and Minnesota Housing to develop a new Dorothy Day Higher Ground Facility which now has 280 shelter beds and 193 single room living units. City staff is currently working with Catholic Charities to develop Phase 2 with a new “Opportunity Connection Center” and up to 170 additional supportive housing units.

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

The City works with the Ramsey County Family Prevention Assistance Program Committee, Ramsey County Continuum of Care (COC) Coordinator, Ramsey County COC Governing Board, and community service agencies to address the needs of homeless adults, homeless families, and homeless youth. Additionally, the City will participate with the following services during 2017:

**Homeless Adults:** The City’s ESG Program funds the Dorothy Day Rapid Rehousing Program (case management and housing assistance to assist shelter residents move from Dorothy Day Center into permanent supportive housing) and the City's Saint Paul Residence provides 60 housing units for chronically-inebriated residents (using Housing First model) and 60 units for at-risk of being homeless residents.

**Homeless Families:** The City provides financing (i.e. CDBG, HOME, TIF, Low Income Housing Tax Credits, HRA funds) to develop affordable housing and affordable supportive housing for more housing opportunities for at-risk of being homeless families. The City's ESG funds community organizations that serve homeless families, such as Catholic Charities–Family Service Center, the YWCA transitional housing, YWCA rapid rehousing program, Theresa Living Center Transitional Housing, and Theresa Living Center Rapid Rehousing. The City’s ESG also funds East Side Family Center, Southern Minnesota Regional Legal Services and House Calls (utility assistance funds) as homeless prevention initiatives for at-risk of being homeless families.

**Homeless Youth:** The City and County recognized that the number of emergency shelter beds for homeless youth remain insufficient. In the recent years, the Otto Bremer Foundation provided grant funding to increase shelter capacity for homeless youth, and the City approved funding for the 180 Degrees project – a 14-bed emergency shelter for homeless youth. In 2017, the City's ESG funds Salvation Army (emergency shelter), Lutheran Social Services (emergency shelter), Ain Dah Yung (emergency shelter) and Face-to-Face Safe Zone – a youth drop-in center (emergency shelter and a rapid

rehousing program) – all programs for unaccompanied homeless youth. Additionally, the City worked with Beacon Interfaith to develop Prior Crossing – an affordable housing project for homeless youth/young adults.

**Homeless Veterans:** Minnesota Assistance Council for Veterans (MACV) provides supportive housing services for veterans, including using ESG funds for street outreach and homeless prevention assistance.

**Affordable Housing: CDBG/HOME/Low Income Housing Tax Credits.** Saint Paul allocates CDBG funds, HOME Funds, and Low Income Housing Tax Credits, as appropriate, to construct or preserve affordable housing, including developing supportive housing for long-term homeless residents. In 2016 these financial tools are assisting Jamestown Homes (preservation of affordable housing), BROWNstone Apartments (new construction-affordable housing, and Dorothy Day Phase II (new construction of permanent supportive housing for homeless residents - contingent upon obtaining state bond funding).

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

Ramsey County provides specific programs and counseling to previously-institutionalized or homeless individuals through partnerships with nonprofit service providers to assist in the transition to permanent housing. The County and community agency partnerships are the primary network that performs this function which also includes assistance such as help with security deposit, child care, job training, transportation, mental health counseling, chemical dependency treatment, and job search.

On the other hand, since 2002, the City of Saint Paul has developed supportive housing facilities, such as Crestview, Visitation, and Jackson Street Village, Jeremiah Program, St. Christopher's Place, and Saint Paul's Residence, which serves at-risk individuals and families. During 2016, the City is working with Catholic Charities to develop the new Dorothy Day Center – Higher Ground facility which provides services for homeless adults and the City worked with Beacon Interfaith to complete Prior Crossing – 44 units of supportive housing for unaccompanied homeless youth. Overall, the City and County work with its community agency partners to fund programs that assist homeless residents. The City's CDBG Funds have also been allocated for the Block Nurse Program and neighborhood non-profit programs that provide assistance to residents-in-need. In 2016, Saint Paul invested \$750,000 of CDBG dollars to renovate 504 units within Skyline Tower where most units are designated to families at or below 30% Area Median Income and the average income is under \$14,000 annually.

## **Discussion**

In summary, affordable housing and supportive services are provided within the City of Saint Paul to homeless residents and residents who are not homeless but need supportive housing, including the elderly, frail elderly, persons with disabilities, persons with HIV/AIDS, persons with chemical dependency, and persons with limited English-speaking proficiency. That said, these diverse communities have often stated that more affordable housing and more affordable supportive housing are needed citywide. In response, the City of Saint Paul's Comprehensive Plan includes a Housing Chapter with strategies to facilitate the development of affordable housing citywide.

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

### Introduction:

The City has affordable housing opportunities including 12,222 publicly-assisted housing units and 4,664 Housing Choice 8 vouchers such that approximately 36% of all City renters receive some type of housing assistance. Yet, the biggest barriers to securing affordable housing are that: 1) many households lack sufficient incomes to rent modestly-priced apartments; and 2) there is a lack of affordable housing opportunities.

Simply speaking, housing statistics for City of Saint Paul demonstrate that:

- The greatest rental needs are households with the lowest incomes, especially 0-50% AMI.
- The greatest homeowner needs are among those with moderate incomes. This is consistent with the data and policy in the City's Comprehensive Plan - Housing Chapter
- Housing needs for elderly homeowners between 0-50 percent of the AMI are high priorities because many elderly homeowners have fixed incomes.
- Housing needs for special needs populations are high priorities

In response, the City's Affordable Housing Policy requires that city-financed rental projects have 10% of the units affordable at 30% AMI and 10% of the units affordable at 50% AMI. The City's Locational Choice Policy and the City's Low Income Housing Tax Credit Selection Process also encourage "a more equitable distribution of affordable housing" citywide. However, even with seemingly insurmountable barriers, the City has partially financed the rehabilitation of 527 affordable rental units, the construction of 15 new affordable rental units, the rehabilitation of 85 owner-occupied housing units, and the construction five owner-occupied homes during the HUD year - using combined financing, such as City STAR funds, City Tax-Increment Financing, federal low-income housing tax credits and federal funds, such as CDBG, NSP, and HOME funds.

Still, the City needs federal and state support to finance affordable housing opportunities. The lack of sufficient federal funding and sufficient allocation of low income housing tax credits – as public policies – have negative effects on the City's affordable housing investments. In 1975, the City received CDBG funding of \$18,835,000. **Forty-one years later, the City's CDBG funding is \$6,347,173. Similarly, the City received HOME funds of \$2,316,000 in 2000; the City may receive \$1,474,817 in 2017.** At the same time, the City has fewer Low Income Housing Tax Credits allocated in 2017 to finance affordable rental housing.

**Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

As previously stated, Saint Paul has approximately 12,222 publicly-assisted affordable housing units within its city limits. In this section, the City's Action Plan (2017) will identify actions to overcome identified barriers to affordable housing, such as follows:

**Lack of Sufficient Funding and Land for Publicly-Assisted Housing.** The major barriers to developing publicly-assisted affordable housing in Saint Paul are the lack of sufficient financing and the lack of available land to meet the affordable housing needs of Saint Paul residents. In response, the City will still finance the preservation, renovation, or new construction of affordable rental housing units citywide—using City-owned land and housing financing, such as the City's STAR funding, City's Tax Increment Financing, federal low-income housing tax credits and federal funds, such as CDBG, NSP, and HOME funds, as available, for 2017 affordable housing developments.

#### **Discussion:**

The City of Saint Paul has affordable housing opportunities such that approximately 36% of all City renters receive some housing assistance. This statistic is a result of numerous public policies and initiatives that support affordable housing citywide, such as

**Zoning Code/Land Use Controls/Growth Limitations:** In recent years, the City amended its zoning code to increase housing density on high-use transportation corridors. Furthermore, the City's Zoning Code does not impose conditional use permits for supportive housing which has the same zoning code classification as required for an apartment building. Additionally, the City's Zoning Code was amended to facilitate the development of permanent supportive housing for chronically-inebriated residents, such that the City could build the Saint Paul Residence (120 units of permanent supportive housing of which 60 units are reserved for chronically-inebriated residents) in the industrially-zoned areas of the Midway neighborhood.



**Service Fees:** The City has developed services fees appropriate for services provided.

**Summary:** The City of Saint Paul has working relationships with the federal and state governments to develop affordable housing in Saint Paul. Furthermore, the City's Affordable Housing Policies support the development of affordable housing citywide. However, the City still lacks sufficient financial capacity to meet the affordable housing needs of all its citizens. Therefore, as public policy, any federal and state budgetary restrictions consequently become the major barriers to developing affordable housing in Saint Paul.



## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

This section identifies additional actions required as part of the annual action plan.

### **Actions planned to address obstacles to meeting underserved needs**

In 2016, the City will address many of its underserved needs through the activities of the ongoing, multi-year HUD funded housing programs. The production and preservation of large family units, and units for very low and extremely low income households will be accomplished through the various homeowner, homebuyer, multi-unit, and new housing development programs carried out by the City and its subgrantees with CDBG and HOME funding. The City allocates its ESG funding to community agencies that serve homeless residents and at-risk of being homeless residents, including homeless residents with mental health challenges. The largest obstacle to meeting underserved needs is a lack of funding for these costly activities.

### **Actions planned to foster and maintain affordable housing**

#### **Actions planned to foster and maintain affordable housing**

In 2016, the City will continue to use the majority of its CDBG funding, and all of its HOME and ESG funding for affordable housing activities. Projects and programs which provide assistance for homebuyers, homeowner rehabilitation, rental rehabilitation, and new construction of affordable housing will be carried out by the City and subgrantees. Descriptions of the specific projects and programs can be found in the Consolidated Plan Listing of Projects section of this document. In addition to the HUD funded activities, the City will carry out housing projects in conjunction with the Minnesota Housing Finance Agency, the Metropolitan Council, the Minneapolis-Saint Paul Family Housing Fund, and the Saint Paul Housing and Redevelopment Authority. As of March 1, 2016, the City estimates that there are approximately 874 vacant residential buildings in the City. The City will use the 60% tax credit rent for determining affordable rents for rental housing that is assisted with CDBG funding. HOME projects will use the established HOME rents.

### **Actions planned to reduce lead-based paint hazards**

Saint Paul will continue to comply with the HUD regulations concerning lead based paint, including notifying applicants of the lead requirements, performing lead screening, requiring abatement by certified workers, and completing clearance testing on HUD funded housing projects. The City will also

continue to work with Ramsey County on the window replacement program for homes with children and identified lead paint issues.

### **Actions planned to reduce the number of poverty-level families**

In 2017, the City will again provide funding for youth workforce development activities and other related public service activities, which complement the programs provided by Ramsey County, who is the primary provider of public services in Saint Paul. The workforce activities include outreach to participants, participant assessment, basic skills training, job training, job placement, work experience, and follow up. The City will continue to give preference to businesses that are comprised of and employ Section 3 residents. The City and some subgrantees also carry out programs that provide assistance to businesses, which may create jobs for low/moderate income persons.

### **Actions planned to develop institutional structure**

Saint Paul's institutional structure gives the City the opportunity to partner with many organizations. In 2016 the City of Saint Paul Department of Planning and Economic Development (PED) will again work with other City departments, as well as other levels of government (County, State, Federal), non-profit organizations, and private sector developers to plan and implement housing, economic development, and community development activities. Saint Paul will continue its partnership with the Saint Paul Port Authority and Greater MSP for business recruitment and expansion that will benefit Saint Paul residents and neighborhoods. Faith-based organizations, such as Catholic Charities and the YWCA will continue to be very involved with planning and implementing homelessness initiatives.

More specifically, the City partners with Ramsey County Continuum of Care and 18+ ESG subgrantees to develop comprehensive services that can assist homeless residents and at-risk of being homeless residents, including serving underserved populations such as homeless veterans and new Americans. The City is also working with Catholic Charities to build the new Dorothy Day Center – Higher Ground which will provide emergency shelter, pay-for stay housing, and permanent supportive housing. This project requires working collaborations among Minnesota Housing Finance Agency, Catholic Charities, Saint Paul Public Works, Capitol Regions Watershed District, and Saint Paul Planning and Economic Development. At the same time, Catholic Charities' new medical respite program (at the new Dorothy Day Center) will require coordination among institutional private health care providers, Catholic Charities, and public health care providers such as Health Care for Homeless.

The City's Low Income Housing Tax Credit Program also encourages equity partnership agreements between private housing providers and non-profit housing organizations. Additionally, this program encourages working partnerships among private housing providers, non-profit housing organizations, and community social services that serve low and moderate income residents and homeless residents (contingent upon available resources for such social services).

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

Saint Paul will continue to coordinate services with Ramsey County (the primary public service provider in the City), and the Saint Paul Public Housing Agency (the administrator of public housing and housing choice vouchers in Saint Paul). The City is also currently working with metro-wide governmental jurisdictions in the final stages of drafting an Addendum to the 2014 Regional Analysis of Impediments ("AI") to Fair Housing Choice which will be published during June 2017. The City will continue to work with Community Development Corporations (CDCs), other non-profit organizations in the City, and the private sector (businesses, developers, social service agencies) to provide housing, economic development, and community development services. City economic development programs provide gap financing, which requires businesses seeking assistance to work with banks and other private sector businesses, as well as CDCs and the Saint Paul Port Authority on commercial and industrial projects. This coordination helps maximize the amount of non-HUD funds invested in these projects.

### **Discussion:**

## **Program Specific Requirements**

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

#### **Introduction:**

The City anticipates receiving \$6,347,173 of Community Development Block Grant (CDBG) funding, \$1,482,826 of HOME Investment Partnership Program (HOME) funding, and \$574,696 of Emergency Solutions Grant (ESG) funding from HUD in 2017. In addition, the City estimates using about \$502,827 in CDBG program income. These estimates are based on the City of Saint Paul receiving the same level of funding from HUD in FY 2017 that was received in FY2016. Should the City of Saint Paul receive less the estimated amount, the City will alter the division of funding in the following manner:

Under the CDBG program, the Administration, Public Service and Clearance activities will be reduced proportionately to the percentage of reduction received from HUD in the formula allocation. The balance of the reduction will then be applied to the Housing Rehabilitation and Economic Development projects. Single family rehabilitation activities under the Housing Rehabilitation project will absorb 50% of the shortfall, while the Economic Development project and Multifamily Rehabilitation activities under the Housing Rehabilitation project will each absorb 25% of the shortfall.

Should the City receive an increase in CDBG funding from the estimated allocation, the City will increase its Administration and Youth Employment Public Service activities, proportionately to the increased level of funding, staying under the 20% and 15% caps respectively. The remaining increase will be split evenly between the Economic Development and Public Facilities projects.

HOME and ESG activities will be reduced or increased in direct proportion to the difference in the actual allocation received from HUD.

A consecutive period of three years: 2017, 2018 & 2019 is being used to determine that the minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income.

### **Community Development Block Grant Program (CDBG)**

#### **Reference 24 CFR 91.220(I)(1)**

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	502,827
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>502,827</b>

### **Other CDBG Requirements**

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	95.00%

### **HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)**

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

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

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

N/A

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

N/A

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

**Emergency Solutions Grant (ESG)  
Reference 91.220(l)(4)**

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

The 2017-2018 Saint Paul ESG Action Plan is attached as part of the Executive Summary.

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

The Ramsey County Continuum of Care has an established centralized coordinated assessment that meets HUD requirements for families experiencing homelessness in Ramsey County. As an example, the Ramsey County Coordinated Access to Housing and Shelter (CAHS) conducts standardized assessments for homeless families to determine the most appropriate housing referral/housing alternatives before a homeless families enters the family emergency shelter. The assessment identifies the most appropriate housing program support based upon the needs and barriers of the family. Families that complete the assessment may be referred to the emergency family shelter or housing programs that offer rapid re-housing, transitional housing, permanent supportive housing. Before entering the shelter, a CAHS Diversion Specialist assist families identify the alternative to shelter. With the limited number of available shelter beds, the Shelter Diversion Services maximizes the use of emergency shelter beds for those families with no other housing option. Currently, Ramsey County COC must use state homelessness prevention funds to pay for the CAHS operations.



Ramsey County COC is also in the early implementation stages of the coordinated assessment for homeless single adults and unaccompanied youth. That said, Ramsey County COC must seek local funding for all of these coordinated assessment systems.

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

The City allocates its ESG funds to community agencies that provide emergency shelter, transitional housing, rapid rehousing, homelessness prevention assistance, and street outreach services to homeless adults, homeless families, homeless youth, and underserved populations. Prior to the issuance of the RFP, the ESG staff consults with the Ramsey County Continuum of Care (COC) Coordinator to develop a preliminary gap analysis of services, including reviewing the needs of underserved populations. The City and the Ramsey County COC recognize that ESG funding is supplemental to the County's homelessness prevention initiatives, which are funded with HUD-COC funds and state FHPAP funds. Additionally, ESG staff meet with ESG subgrantees to determine the service level needs of the communities served. Approximately 18+ community agencies apply for ESG funds annually. All proposals are reviewed. ESG staff person consults with Ramsey County COC before submitting recommendations for City Council approval. Overall, the ESG funding allocations recognize 1) services to homeless adults, homeless families, homeless youth, and underserved populations, such as new Americans, refugees, and homeless veterans; 2) the supplemental funding needs of COC programs; 3) prior performance of ESG subgrantees; and 4) the national HUD housing objectives.

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

The City ESG and County COC supports the participation of homeless residents on various issues and projects, such as the Ramsey County Continuum of Care and the Family Homelessness Prevention Assistance Program Committee. It is encouraging to see some homeless residents become empowered by their ongoing participation with the Homeless Advisory Board. Additionally, many ESG subgrantees have participant-driven programming, such that subgrantees encourage input from program participants, including individualized case management meetings, client satisfaction surveys, and group meetings during which program participants can review services, plan events and activities, and help provide solutions to problems and concerns.



5. Describe performance standards for evaluating ESG.

The City's ESG staff person consults with the CPD Monitoring Handbook as well as the City's Compliance Monitoring staff person before conducting a compliance review. When conducting an on-site review, City staff meet with subgrantee to review the following, as appropriate:

- A copy of the current counseling work plan.
- A list of housing counseling staff indicating their years of experience
- Staff training
- Financial records
- List of community service referrals
- Copy of disclosure forms
- Access to housing counseling files.
- List of clients counseled; services provided; description of needs of participants (i.e. meeting HUD definition of homeless); screening process; review of case management services; and housing assistance provided; cultural competency, and participant-driven programing.

During February 2017, ESG and COC conducted staff training for ESG/COC grantees with emphasis on HUD program requirements and issues of coordinated assessment.

**Housing Trust Fund (HTF)  
Reference 24 CFR 91.220(I)(5)**

1. Distribution of Funds

- a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2).
- b. Describe the jurisdiction's application requirements for eligible recipients to apply for HTF funds.
- c. Describe the selection criteria that the jurisdiction will use to select applications submitted by eligible recipients.
- d. Describe the jurisdiction's required priority for funding based on geographic distribution, which is a description of the geographic areas of the State (including areas of low-income and minority

concentration) in which it will direct assistance during the ensuing program year.

e. Describe the jurisdiction's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner.

f. Describe the jurisdiction's required priority for funding based on the extent to which rents for units in the rental project are affordable to extremely low-income families.

g. Describe the jurisdiction's required priority for funding based on the financial feasibility of the project beyond the required 30-year period.

h. Describe the jurisdiction's required priority for funding based on the merits of the application in meeting the priority housing needs of the jurisdiction (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations).

i. Describe the jurisdiction's required priority for funding based on the location of existing affordable housing.

j. Describe the jurisdiction's required priority for funding based on the extent to which the application makes use of non-federal funding sources.

2. Does the jurisdiction's application require the applicant to include a description of the eligible activities to be conducted with HTF funds?

3. Does the jurisdiction's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements?

4. **Performance Goals and Benchmarks.** The jurisdiction has met the requirement to provide for

performance goals, consistent with the jurisdiction's goals established under 24 CFR 91.215(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

**5. Rehabilitation Standards.** The jurisdiction must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The jurisdiction's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The jurisdiction must attach its rehabilitation standards below. If the jurisdiction will not use HTF funds for the rehabilitation of housing, enter "N/A".

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; and Capital Needs Assessments (if applicable).

**6. Resale or Recapture Guidelines.** Below, the jurisdiction must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter "N/A".

**7. HTF Affordable Homeownership Limits.** If the jurisdiction intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with §93.305. If the jurisdiction will not use HTF funds to assist first-time homebuyers, enter "N/A".

**8. Limited Beneficiaries or Preferences.** Describe how the jurisdiction will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the jurisdiction will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter "N/A."

Any limitation or preference must not violate nondiscrimination requirements in § 93.350, and the

jurisdiction must not limit or give preferences to students. The jurisdiction may permit rental housing owners to limit tenants or give a preference in accordance with § 93.303 only if such limitation or preference is described in the action plan.

**9. Refinancing of Existing Debt.** Enter or attach the jurisdiction's refinancing guidelines below. The guidelines describe the conditions under which the jurisdiction will refinance existing rental housing project debt. The jurisdiction's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the jurisdiction will not refinance existing debt, enter "N/A."

**Discussion:**

## APPENDIX A



# City of Saint Paul, Minnesota

## Citizen Participation Plan

The Department of Housing and Urban Development (HUD) requires jurisdictions which receive their program funds to follow a prescribed set of principles to ensure that community groups and organizations are involved in the planning and expenditure of HUD funds.

Saint Paul's citizen participation process began in 1966, approximately 3 decades prior to our HUD partners adopting the current requirements. In 1975, Saint Paul expanded its citizen processes with the establishment of District Councils. These organizations are officially recognized by the Mayor and City Council, with a primary responsibility to provide advice and recommendations on physical, economic, and social development issues. In addition, the district councils engage in community outreach, identify neighborhood needs and initiate community programs. And for almost three decades, Saint Paul has provided financial and technical assistance to more than 100 neighborhood groups and organizations as part of our ongoing commitment to community participation.

Listed below please find the HUD requirements for community involvement, and following each section is a brief explanation how Saint Paul meets or exceeds the HUD regulations. The entire federal rules may be found in Title 24, Code of Federal Regulations, Part 91.100 through 91.115.

### **91.100 Consultation; local governments.**

#### **(a) General.**

(1) When preparing the consolidated plan, the jurisdiction shall consult with other public and private agencies that provide assisted housing, health services, and social and fair housing services (including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons) during preparation of the consolidated plan.

*Saint Paul's Consolidated Plan is a collaboration and compilation of a number of City approved plans, programs, and strategies. Saint Paul's Long Range Capital Improvement Budget and Program is nationally recognized for its grass roots approach to citizen involvement in the city's budgeting processes.*

*During the preparation of the 2015-2019 Consolidated Plan, city staff consulted with numerous community based leaders, groups, and organizations on various aspects including: district councils, neighborhood non-profits, housing and public service providers, advocacy groups, local and regional governmental agencies, public housing providers, Ramsey County and community providers.*

(2) When preparing the portion of its consolidated plan describing the jurisdiction's homeless strategy and the resources available to address the needs of the homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) and persons at risk of being homelessness, the jurisdiction must consult with:

- (i) The Continuum(s) of Care that serve(s) the jurisdiction's geographic area;



(ii) Public and private agencies that address housing, health, social service, victim services, employment, or education needs of low-income individuals and families; homeless individuals and families, including homeless veterans; youth and/or persons with special needs;

(iii) Publicly funded institutions and systems of care that may discharge persons into homelessness (such as healthcare facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and

(iv) Business and civic leaders.

*The City allocates its Emergency Solution Grants ("ESG") funds to agencies that provide homeless prevention services, emergency shelter facilities, transitional housing, rapid rehousing services, counseling services, street outreach services, and data collection. In order to develop its annual Emergency Solutions Action ("ESG") Plan, the City consults with Ramsey County Continuum of Care ("COC") Governing Board as well as Ramsey County Family Homelessness Prevention Assistance Program ("FHPAP") committee. Both committees are comprised of social services agencies that serve homeless residents as well as concerned citizens. Throughout the year, the City also works closely with Ramsey County COC Coordinator to ensure the delivery of comprehensive homelessness services, including identifying publicly-funded institutions, such as the State of Minnesota Corrections and systems of care that may discharge persons into homelessness. Furthermore, the City consults with social agencies and public jurisdictions, including the State of Minnesota and the Ramsey County Veterans Office, to develop programs responsive to homeless veterans. The City also consults with social service agencies and housing providers that serve homeless youth.*

(3) When preparing the portion of its consolidated plan concerning lead-based paint hazards, the jurisdiction shall consult with state or local health and child welfare agencies and examine existing data related to lead-based paint hazards and poisonings, including health department data on the addresses of housing units in which children have been identified as lead poisoned.

*City elected officials and staff are seriously concerned with the health risks associated with lead based paint. Staff have an on-going collaboration with the State of Minnesota, Ramsey County Health Department, our for-profit and non-profit community service providers to insure that the risks associated with lead based paint are mitigated.*

(4) When preparing the description of priority non-housing community development needs, a unit of general local government must notify adjacent units of general local government, to the extent practicable. The non-housing community development plan must be submitted to the state, and, if the jurisdiction is a CDBG entitlement grantee other than an urban county, to the county.

*Saint Paul, is totally within the boundaries of its larger State of Minnesota governmental unit, Ramsey County. The City and Ramsey County not only notify each other in the areas of non-housing community development needs, but collaborate in the delivery of health care, senior services, and youth employment programs.*

(5) The jurisdiction also should consult with adjacent units of general local government, including local government agencies with metropolitan-wide planning responsibilities, particularly for problems and solutions that go beyond a single jurisdiction.

*A number of years ago, Saint Paul and Minneapolis jointly initiated an Inter-jurisdictional group of adjacent public agencies to share knowledge, strategies, and planning efforts. The city also actively participates in the activities of the Metropolitan Council, the state authorized agency charged with planning activities in the greater metropolitan area of Saint Paul, Minneapolis, Bloomington, and surrounding cities and counties.*

(b) HOPWA The largest city in each eligible metropolitan statistical area (EMSA) that is eligible to receive a HOPWA formula allocation must consult broadly to develop a metropolitan-wide strategy for addressing the needs of persons with HIV/AIDS and their families living throughout the EMSA. All jurisdictions within the EMSA must assist the jurisdiction that is applying for a HOPWA allocation in the preparation of the HOPWA submission.

*Minneapolis is the designated city eligible for receiving HOPWA funding.*

(c) Public housing. The jurisdiction shall consult with the local public housing agency (PHA) concerning consideration of public housing needs and planned programs and activities. This consultation will help provide a better basis for the certification by the authorized official that the PHA Plan is consistent with the consolidated plan and the local government's description of the manner in which it will address the needs of public housing and, where necessary, the manner in which it will provide financial or other assistance to a troubled PHA to improve its operations and remove such designation. It will also help ensure that activities with regard to local drug elimination, neighborhood improvement programs, and resident programs and services, funded under a PHA's program and those funded under a program covered by the consolidated plan, are fully coordinated to achieve comprehensive community development goals. If a PHA is required to implement remedies under a Section 504 Voluntary Compliance Agreement to provide accessible units for persons with disabilities, the local jurisdiction should consult with the PHA and identify actions it may take, if any, to assist the PHA in implementing the required remedies. A local jurisdiction may use CDBG funds for eligible activities or other funds to implement remedies required under a Section 504 Voluntary Compliance Agreement.

*The City of Saint Paul works closely with the Saint Paul Public Housing Authority, one of the premier PHA's in the nation. This relationship is based on mutual goals, staff cooperation, joint planning and program development. When required, the City reviews PHA activities for consistency with its Consolidated Plan.*

(d) Emergency Solutions Grants (ESG). A jurisdiction that receives as ESG grant must consult with the Continuum of Care in determining how to allocate its ESG grant for eligible activities; in developing the performance standards for, and evaluating the outcomes of, projects and activities assisted by ESG funds; and in developing funding, policies, and procedures for the operation and administration of HMS.

*The City consults with Ramsey County Continuum of Care ("COC") Governing Board as well as Ramsey County Family Homelessness Prevention Assistance Program ("FHPAP") committee which prioritized delivery of services to 1)homeless families, 2) homeless youth, and then 3) to homeless individuals. The City consults with Ramsey County COC regarding the annual allocation of ESG funds. Moreover, the City will continue to work closely with Ramsey County COC to ensure the delivery of comprehensive homelessness services as well as developing performance standards for evaluating projects and services assisted by ESG funds. Finally, the City will continue to work with Ramsey County COC regarding the administration of HMIS.*

#### **91.105 Citizen participation plan; local governments.**

(a) Applicability and adoption of the citizen participation plan.

(1) The jurisdiction is required to adopt a citizen participation plan that sets forth the jurisdiction's policies and procedures for citizen participation. (Where a jurisdiction, before February 6, 1995, adopted a citizen participation plan that complies with section 104(a)(3) of the Housing and Community Development Act of 1974 (42 U.S.C.

5304(A)(3)) but will need to amend the citizen participation plan to comply with provisions of this section, the citizen participation plan shall be amended by the first day of the jurisdiction's program year that begins on or after 180 days following February 6, 1995.)

*The City's comprehensive involvement of citizens includes the Capital Budget process, the District Council Planning process, and participation in various citywide planning efforts, including the adopted Housing Plan, Ramsey County\City of Saint Paul Homelessness Plan, and neighborhood small area plans. For the purposes of the HUD document, Saint Paul's Plan was adopted as part of the 1995 Consolidated Plan and process, and updated as needed in the adoption. In reality, Saint Paul has more than 35 years of promoting and actively partnering with community organizations and citizen groups.*

(2) Encouragement of citizen participation.

(i) The citizen participation plan must provide for and encourage citizens to participate in the development of the consolidated plan, any substantial amendments to the consolidated plan, and the performance report. These requirements are designed especially to encourage participation by low- and moderate-income persons, particularly those living in slum and blighted areas and in areas where CDBG funds are proposed to be used, and by residents of predominately low- and moderate-income neighborhoods, as defined but he jurisdiction. A jurisdiction is also expected to take whatever actions are appropriate to encourage the participation of all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities.



*Saint Paul's Consolidated Plan draws on, and is many ways a composite of a number of the cities adopted plans, policies, and budgetary documents. Each major section has had extensive citizen review, comment, and community input. Any and all changes follow both the city's tradition of citizen input, and exceed HUD requirements.*

*Saint Paul's Capital Budget Process and neighborhood planning activities are designed to encourage participation by all members of the community. Through our neighborhood district councils, Early Notification Systems, non-profit community, and the publication of notices, the city attempts to reach as many citizens as possible.*

(ii) The jurisdiction shall encourage the participation of local and regional institutions, the Continuum of Care and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations) in the process of developing and implementing the consolidated plan.

*To implement the consolidated plan, the City has ongoing discussions with local and regional institutions, Ramsey County COC Governing Board, non-profit affordable housing providers, for-profit housing providers, philanthropic organizations, such as Family Housing Fund, and community-based and faith-based organizations, such as Interfaith Action of Greater Saint Paul and Catholic Charities, in order to develop a comprehensive housing strategy and housing programs that are responsive to the needs of its citizenry.*

(iii) The jurisdiction shall encourage, in conjunction with consultation with public housing agencies, the participation of residents of public and assisted housing developments, in the process of developing and implementing the consolidated plan, along with other low-income residents of targeted revitalization areas in which the developments are located. The jurisdiction shall make an effort to provide information to the public housing agency (PHA) about consolidated plan activities related to its developments and surrounding communities so that the PHA can make this information available at the annual public hearing required for the PHA Plan.

*The Saint Paul Public Housing Authority and the City of Saint Paul are each required to submit their own Consolidated Plans to HUD. As distinct entities, the City of Saint Paul and the local public housing authority have a long tradition of effectively working together, and consult each other in the preparation of plans, documents, and proposed activities.*

(iv) The jurisdiction should explore alternative public involvement techniques and quantitative ways to measure efforts that encourage citizen participation in a shared vision for change in communities and neighborhoods, and the review of program performance: eg., use of focus groups and the Internet.

*Saint Paul has been using both traditional and alternative methods in its citizen participation process for many years, including use of the web, ENS list serve and most*

*recently, pop-up meetings.*

(3) Citizen comment on the citizen participation plan and amendments. The jurisdiction must provide citizens with a reasonable opportunity to comment on the original citizen participation plan and on substantial amendments to the citizen participation plan, and must make the citizen participation plan public. The citizen participation plan must be in a format accessible to persons with disabilities, upon request.

*Approximately 20 years prior to HUD creating citizen requirements, Saint Paul established procedures for citizens to have an opportunity to participate in decision making. These mechanisms, including neighborhood review, public notices, citizen review through the Capital Budget process, and formal approval exceed all existing HUD requirements.*

(b) Development of the consolidated plan. The citizen participation plan must include the following minimum requirements for the development of the consolidated plan.

(1) The citizen participation plan must require that, before the jurisdiction adopts a consolidated plan, the jurisdiction will make available to citizens, public agencies, and other interested parties information that includes the amount of assistance the jurisdiction expects to receive (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income. The citizen participation plan also must set forth the jurisdiction's plans to minimize displacement of persons and to assist any persons displaced, specifying the types and levels of assistance the jurisdiction will make available (or require others to make available) to persons displaced, even if the jurisdiction expects no displacement to occur. The citizen participation plan must state when and how the jurisdiction will make this information available.

*All of the programs, projects, and activities financed with funds from HUD are budgeted through the City's annual Capital/Improvement Budget and Process, Operating and Special Funds Budgets. These processes have extensive input: at the outset with community groups being actively involved with proposing projects, through the multiple citizen reviews, and finally with the public hearings and approvals by elected officials. Prior to the adoption of the City's Consolidated Plan, city staff publish and make available to citizens program information as required by the federal government, and specifically in the format as required by HUD.*

*Incorporated by reference and attached to this document is a copy of the City's Residential Antidisplacement and Relocation Assistance Plan.*

(2) The citizen participation plan must require the jurisdiction to publish the proposed consolidated plan in a manner that affords citizens, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. The citizen participation plan must set forth how the jurisdiction will publish the proposed consolidated plan and give reasonable opportunity to examine the contents of the proposed consolidated plan. The requirement for publishing may be met by publishing a summary of the proposed consolidated plan in one or more newspapers of general circulation, and by making copies of the proposed

consolidated plan available at libraries, government offices, and public places. The summary must describe the contents and purpose of the consolidated plan, and must include a list of the locations where copies of the entire proposed consolidated plan may be examined.

In addition, the jurisdiction must provide a reasonable number of free copies of the plan to citizens and groups that request it.

*A summary of Saint Paul's Consolidated Plan is published in the Saint Paul Pioneer Press. Copies of the proposed Consolidated Plan are available at City offices, Saint Paul Public Libraries, through the city's 17 District Councils, and other public venues. The plan is published on the City's website and free copies are available at all times during the program year.*

(3) The citizen participation plan must provide for at least one public hearing during the development of the consolidated plan. See paragraph (e) of this section for public hearing requirements, generally.

*See paragraph (e) of this section for public hearing requirements.*

(4) The citizen participation plan must provide a period, not less than 30 days, to receive comments from citizens on the consolidated plan.

*The City publicizes and makes notice a thirty (30) day period whereby it will receive comments on the consolidated plan. While this meets the federal requirement, staff accepts comments on the consolidated plan and all program documents at any time during the year.*

(5) The citizen participation plan shall require the jurisdiction to consider any comments or views of citizens received in writing, or orally at the public hearings, in preparing the final consolidated plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefor, shall be attached to the final consolidated plan.

*Saint Paul has, for more than 25 years, provided for participation in its planning and budget processes that exceeds the above HUD requirements. Through the Capital Budget process, persons are notified through publications, community groups, the City's Early Notification List mechanism, and others. By the conclusion of the city's six months process, multiple public hearings have been held at as many as five different participatory levels. In addition, city staff routinely perform the specific HUD requirements, which include even more notices, hearings, and additional comment periods.*

*As part of the Consolidated Plan process, the Saint Paul will complete its draft plan and publish a notice in the Saint Paul Pioneer Press on or before March 15th. Any and all comments received will be considered, and will be incorporated into the final document.*

(c) Amendments.

(1) Criteria for amendment to consolidated plan. The citizen participation plan must specify the criteria the jurisdiction will use for determining what changes in the jurisdiction's planned or actual activities constitute a substantial amendment to the



consolidated plan. (See §91.505.) It must include among the criteria for a substantial amendment changes in the use of CDBG funds from one eligible activity to another.

(2) The citizen participation plan must provide citizens with reasonable notice and an opportunity to comment on substantial amendments. The citizen participation plan must state how reasonable notice and an opportunity to comment will be given. The citizen participation plan must provide a period, not less than 30 days, to receive comments on the substantial amendment before the amendment is implemented.

(3) The citizen participation plan shall require the jurisdiction to consider any comments or views of citizens received in writing, or orally at public hearings, if any, in preparing the substantial amendment of the consolidated plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefor, shall be attached to the substantial amendment of the consolidated plan.

*The City of Saint Paul follows very specific criteria for amending its programs and budgets, and are found on the following page. These requirements are, in fact, more specific than the HUD guidelines in terms of what constitutes a change in program, and in the changing of funding priorities. A copy of Saint Paul's procedures for preparing and implementing a substantial amendment is attached and hereby made part of this document.*

(d) Performance reports.

(1) The citizen participation plan must provide citizens with reasonable notice and an opportunity to comment on performance reports. The citizen participation plan must state how reasonable notice and an opportunity to comment will be given. The citizen participation plan must provide a period, not less than 15 days, to receive comments on the performance report that is to be submitted to HUD before its submission.

*Saint Paul provides notice and opportunity to comment on its program performance in accordance with all HUD and local rules and regulations.*

(2) The citizen participation plan shall require the jurisdiction to consider any comments or views of citizens received in writing, or orally at public hearings in preparing the performance report. A summary of these comments or views shall be attached to the performance report.

*Saint Paul has participated in, and followed HUD program guidelines involving program performance reporting for more than 25 years. The city routinely publishes a notice in the local newspaper 15 days before the annual performance report is submitted to HUD, and makes the report public. The report is available to the public, and the city will consider written comments. A summary of all comments will be attached to report that is submitted to HUD.*

(e) Public hearings.

(1) The citizen participation plan must provide for at least two public hearings per year to obtain citizens' views and to respond to proposals and questions, to be conducted at a minimum of two different stages of the program year. Together, the hearings must address housing and community development needs, development of proposed activities, and review of program performance. To obtain the views of



citizens on housing and community development needs, including priority non-housing community development needs, the citizen participation plan must provide that at least one of these hearings is held before the proposed consolidated plan is published for comment.

*In a typical year, the City of Saint Paul will conduct three or four public hearings on its CDBG program prior to its adoption, and as many additional hearings as required to ensure that all City and HUD requirements are being fulfilled.*

(2) The citizen participation plan must state how and when adequate advance notice will be given to citizens of each hearing, with sufficient information published about the subject of the hearing to permit informed comment. (Publishing small print notices in the newspaper a few days before the hearing does not constitute adequate notice. Although HUD is not specifying the length of notice required, it would consider two weeks adequate.)

*The City publishes all notices approximately 10 days prior to a meeting, hearing, or formal action. This conforms with locally accepted policy.*

(3) The citizen participation plan must provide that hearings be held at times and locations convenient to potential and actual beneficiaries, and with accommodation for persons with disabilities. The citizen participation plan must specify how it will meet these requirements.

*All hearings are held in accessible locations, and at times that vary so as to provide for reasonable accommodation to all interested persons.*

(4) The citizen participation plan must identify how the needs of non-English speaking residents will be met in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate.

*Saint Paul routinely provides for language and sign interpreters as needed.*

(f) *Meetings.* The citizen participation plan must provide citizens with reasonable and timely access to local meetings.

*Meetings are generally held in city buildings, or in neighborhood community centers, and at times that are convenient to encourage participation.*

(g) *Availability to the public.* The citizen participation plan must provide that the consolidated plan as adopted, substantial amendments, and the performance report will be available to the public, including the availability of materials in a form accessible to persons with disabilities, upon request. The citizen participation plan must state how these documents will be available to the public.

*All program documents are available at all times to the general public.*

(h) Access to records. The citizen participation plan must require the jurisdiction to

provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to the jurisdiction's consolidated plan and the jurisdiction's use of assistance under the programs covered by this part during the preceding five years.

*City and HUD rules require that public documents be available, and timely access be provided. HUD program documents are available at all city libraries, neighborhood district council offices, and on-line through the city's website.*

(i) Technical assistance. The citizen participation plan must provide for technical assistance to groups representative of persons of low- and moderate-income that request such assistance in developing proposals for funding assistance under any of the programs covered by the consolidated plan, with the level and type of assistance determined by the jurisdiction. The assistance need not include the provision of funds to the groups.

*Saint Paul has been nationally recognized for more than 30 years for its participatory government, and for encouraging and assisting persons wishing to participate in the city's programs.*

(j) Complaints. The citizen participation plan shall describe the jurisdiction's appropriate and practicable procedures to handle complaints from citizens related to the consolidated plan, amendments, and performance report. At a minimum, the citizen participation plan shall require that the jurisdiction must provide a timely, substantive written response to every written citizen complaint, within an established period of time (within 15 working days, where practicable, if the jurisdiction is a CDBG grant recipient).

*Due in part to the City's inclusive policies and procedures governing the planning and administration of its programs, Saint Paul tends to receive very few complaints. When staff receive concerns or complaints, they are taken seriously, and responded to in as timely a manner as possible, often within 15 days when practicable.*

(k) Use of citizen participation plan. The jurisdiction must follow its citizen participation plan.

*The city follows the guidelines, policies and procedures contained in its own citizen participation documents, and those required by HUD.*

(l) Jurisdiction responsibility. The requirements for citizen participation do not restrict the responsibility or authority of the jurisdiction for the development and execution of its consolidated plan.

## **Public Comments**

*Typically the city receives a number of comments on the Consolidated Plan, and on programs and projects financed with CDBG, HOME, and ESG funds. The city considers all comments prior to adoption of the Consolidated Plan. Citizen review and involvement is included in every step of the preparation of the City's Capital Improvement Budget, the city's annual operating budget, and the accompanying planning documents. Public hearings were held on each of the above items by city*

*staff, the Planning Commission, the Capital Improvement Budget Committee, Mayor, and City Council.*

*In accordance with the Consolidated Plan regulations, Saint Paul includes representatives from federal, state and local government, public and private for-profit and non-profit organizations, human and social service providers.*

**City of Saint Paul, Minnesota**  
**Residential Antidisplacement and Relocation Assistance Plan**

**1. Steps Taken to Minimize Displacement:**

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

(A) Consider at the feasibility of rehabilitation before pursuing the demolition of unsafe, dilapidated properties.

(B) Consider alternate locations for new development that requires the demolition of properties and relocation of families and individuals.

**2. Relocation Assistance:**

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

(A) Advisory services at the levels described in 49 CFR part 24, subpart C.

Tenants shall be advised of their rights in such a matter that will provide a choice between relocating within their neighborhood and other neighborhoods.

(B) Payment for moving expenses at the levels described in 49 CFR part 24, subpart D.

(C) The reasonable and necessary cost of any security deposit required to rent the replacement dwelling unit, and for credit checks required to rent or purchase the replacement dwelling unit.

(D) Interim living costs. The City shall reimburse a person for the actual reasonable out of pocket costs incurred with temporary relocation if the person must relocate temporarily, including moving expenses and increased housing costs.

(E) Replacement housing assistance. Persons are eligible to receive one of the following two forms of replacement housing: (1) Rental assistance equal to 60 times the amount necessary to reduce the monthly rent and estimated average monthly cost of utilities for a replacement dwelling to the Total Tenant Payment. All or a portion of this assistance may be offered through a certificate or housing voucher for rental assistance. If a certificate or voucher is provided to a person, the City must provide referrals to comparable replacement units where the owner is willing to participate in the Section 8 Program. To the extent that cash assistance is provided, it will be provided in installments. (2) If the person purchases an interest in a housing cooperative or mutual housing association and occupies a decent, safe, and sanitary dwelling in the cooperative or association, the person may elect to receive a lump sum payment. The payment shall be equal to the capitalized value of 60 monthly installments of the amount that is obtained by subtracting the Total Tenant Payment from the monthly rent and estimated monthly cost of utilities at a comparable replacement dwelling

unit. To compute the capitalized value, the installments shall be discounted at the rate of interest paid on passbook savings deposits by a Federally insured Bank or Savings and Loan institution conducting business in the City.

### **3. One-for One Replacement Units:**

(i) -All occupied and vacant occupiable low/moderate income units that are demolished or converted in connection with a CDBG or HOME funded activity must be replaced with low/moderate income units.

(ii) - The replacement units may be provided by any government agency or private developer, and must meet the following requirements:

(A) The units must be located within the City of Saint Paul, and to the extent feasible, the units shall be located within the same neighborhood as the units being replaced.

(B) The units must be sufficient in number and size to house no fewer than the number of occupants who could have been housed in the units being demolished or converted. The number of occupants who could have been housed in units shall be determined by the City occupancy codes. The City may not replace the units with smaller units unless it is consistent with the needs analysis in the Consolidated Plan.

(C) The units must be provided in standard condition.

(D) The units must be made available for occupancy at any time beginning one year before the City submits its replacement plan to HUD, and ending three years after the commencement of demolition or conversion.

(E) The units must be designed to remain low/moderate income units for at least 10 years from the date of initial occupancy.

(F) Replacement units may include public housing or existing housing receiving Section 8 project-based assistance.

(iii) - Before the City enters into a contract for the demolition or conversion of low/moderate income dwelling units, the following information must be made public and submitted to the local HUD Field Office:

(A) A description of the proposed activity to be assisted with CDBG funding.

(B) The location on a map and number of low/moderate income dwelling units by size (number of bedrooms) that will be demolished or converted as a result of the assisted activity.

(C) A time schedule for the commencement and completion of the demolition or conversion.

(D) The location on a map and the number of dwelling units by size that will be provided as replacement dwelling units. If this information is not available at the time of the submission, the general location and approximate number of dwelling units by size shall be identified. The specific location and exact number of dwelling units shall be submitted and made public as soon as the information is available.

(E) The source of funding and a time schedule for the provision of the



replacement low/moderate dwelling units.

(F) The basis for concluding that each replacement unit will remain a low/moderate income dwelling unit for at least 10 years from the date of initial occupancy.

(G) Information demonstrating that any replacement of units with smaller units is consistent with the City's Consolidated Plan.

(iv) -The one-for-one replacement requirement does not apply to the extent the local HUD Field Office determines that there is an adequate supply of vacant low/moderate income dwelling units in standard condition available on a nondiscriminatory basis within the City, or an area larger than the jurisdiction of the City. The City must submit a request for this determination to the local HUD Field Office, and also make the request public and inform the public that they have 30 days to provide HUD additional information supporting or opposing the request.

**CITY OF SAINT PAUL, MINNESOTA  
COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM  
SUBSTANTIAL AMENDMENTS TO THE CONSOLIDATED PLAN**

In accordance with 24 CFR 91.505, the City of Saint Paul has developed the criteria to be used to determine what changes in the Community Development Block Grant (CDBG) program constitute a substantial amendment, and therefore require an amendment to the City's Consolidated Plan. These basic criteria have been incorporated since the beginning of the CDBG program, 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 Section of the City of Saint Paul has determined that the following actions will be considered substantial amendments to the CDBG program:

- 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 \$50,000.00 and also exceeds 25 percent of the amount appropriated for the project;
- A change in 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.

If a substantial amendment is made, the City will follow all applicable HUD rules, as prescribed in the federal regulations. Written comments on the substantial amendment will be reviewed by City staff, the Mayor, and City Council before the decision to implement the amendment is made.



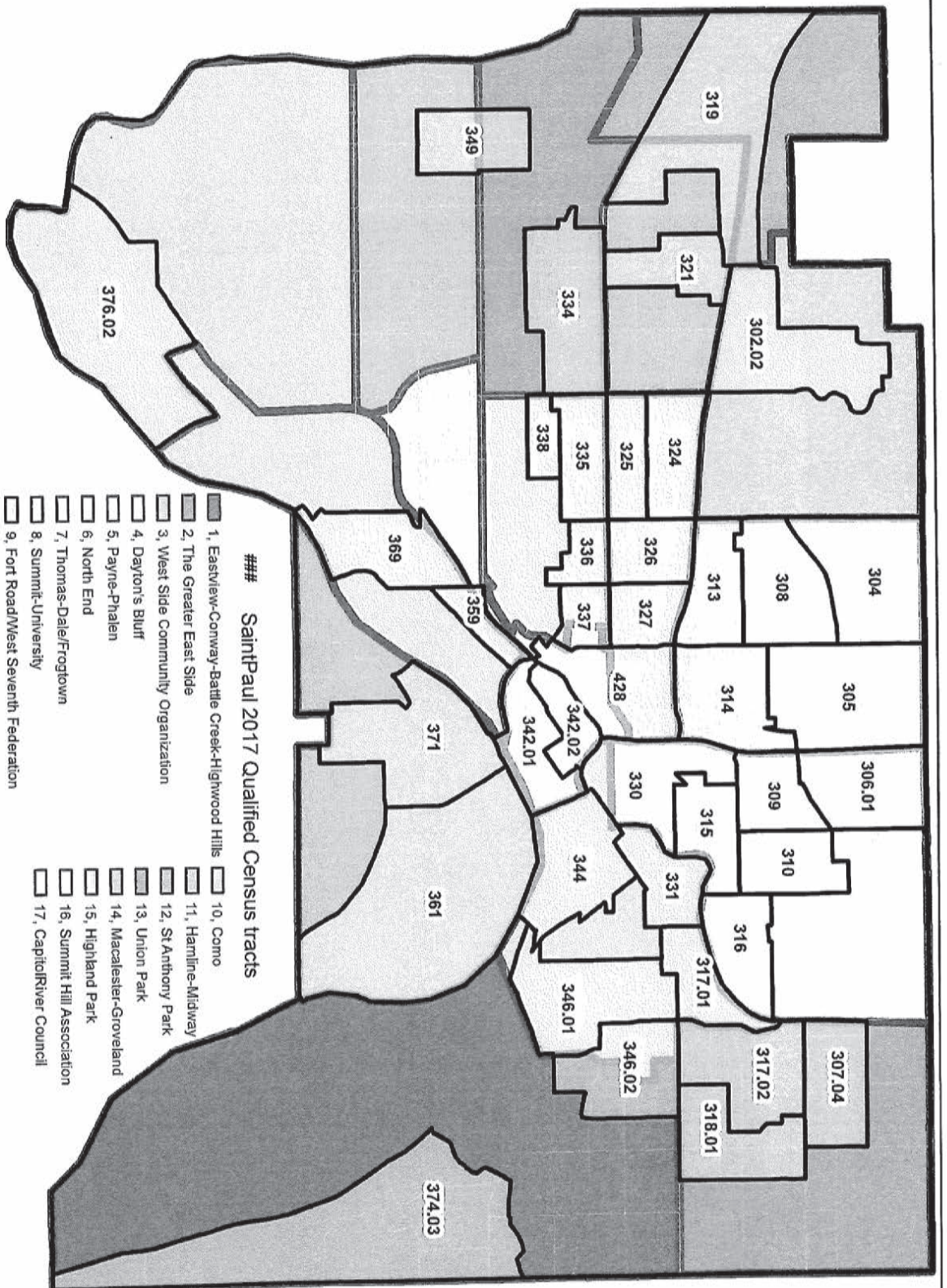




# 2017 Qualified Census Tracts

## CDBG-eligible areas

Source: U.S. HUD, U.S. Census Bureau, Saint Paul FEO, Ramsey County



Date: 11/3/2016



**CITY OF SAINT PAUL, MINNESOTA  
EMERGENCY SOLUTIONS GRANT  
2017-2018 ACTION PLAN**

Information regarding the 2016-2017 Action Plan

Please call Joe Collins, Saint Paul Planning and Economic Development Department at 651-266-6020  
or [joe.collins@ci.stpaul.mn.us](mailto:joe.collins@ci.stpaul.mn.us)

**Table 3**

**Consolidated Plan Listing of Projects**

**Applicant's Name** City of Saint Paul, MN

**Priority Need** Homeless

**Project Title** Emergency Solutions Grant

**Project Description**

The City will use Emergency Solutions Grant funding for homeless prevention, operating costs of shelters, essential services, rapid rehousing (rental assistance, case management, data collection) and ESG administration. The allocation process for ESG funds will occur in late summer or early fall, when an RFP will be published and also sent to providers of homeless services. All applicants are required to provide a 1 to 1 match, which consists of foundation, private sector, State and local funding.

Objective Category: Suitable Living Environment    ☒ Decent Housing    Economic Opportunity

Outcome Category:    ☒ Availability/Accessibility    Affordability    Sustainability

**Location:** Community Wide

Objective Number	Project ID	Funding Sources:	
Housing 4 Homeless 1 - 4	14	CDBG	
HUD Matrix Code	CDBG Citation	ESG	\$574,696
03C	570.201(C)	HOME	
Type of Recipient	CDBG National Obj.	HOPWA	
Subrecipient		Total Formula	\$574,696
Start Date	Completion Date	Prior Years Funding	
01/01/17	12/31/17	Assisted Housing	
Performance Indicator	Annual Units	PHA	
Number of Persons Served	3,000 Persons	Other Funding	
Local ID	Units Upon Completion	<b>Total</b>	<b>\$574,696</b>
	3,000 Persons		

The primary purpose of this project is to help:    ☒ The Homeless    Persons with HIV/AIDS    Persons with Disabilities  
Public Housing Needs

**Table 3**

**Consolidated Plan Listing of Projects**

**Applicant's Name**                      City of Saint Paul, MN

**Priority Need**                              Homeless

**Project Title**                              Emergency Solutions Grant – Street Outreach

**Project Description**

The City may use Emergency Solutions Grant funding for street outreach to homeless youth and/or homeless adults with mental health challenges who are living outside. The allocation process for ESG will occur during late summer or early fall when RFP will be published and sent to homeless services. ESG requires a 1 to 1 match so that applicants must provide 1 to 1 match by securing funds from foundations, the private sector, State funds, local funds or overall the 1 to 1 match may also be recognized within the total ESG program.

Objective Category:    Suitable Living Environment      ☒ Decent Housing    Economic Opportunity

Outcome Category:    ☒ Availability/Accessibility              Affordability              Sustainability

**Location:**              Community Wide

<b>Objective Number</b>	<b>Project ID</b>	<b>Funding Sources:</b>  CDBG  ESG                      \$49,500  HOME  HOPWA  Total Formula              \$49,500  Prior Years Funding  Assisted Housing  PHA  Other Funding  <b>Total (max allocation) \$49,500</b>
Housing 4 Homeless 1 – 4	14	
<b>HUD Matrix Code</b>	<b>CDBG Citation</b>	
03C	570.201(C)	
<b>Type of Recipient</b>	<b>CDBG National Obj.</b>	
Subrecipient		
<b>Start Date</b>	<b>Completion Date</b>	
01/01/17	12/31/17	
<b>Performance Indicator</b>	<b>Annual Units</b>	
Number of Persons Served	Outreach to approximately 100 persons	
<b>Local ID</b>	<b>Units Upon Completion</b>	
	Outreach to approximately 100 persons	

The primary project purpose assists ☒ The Homeless    Persons with HIV/AIDS    Persons with Disabilities    Public Housing Needs



**Table 3**

**Consolidated Plan Listing of Projects**

**Applicant's Name** City of Saint Paul, MN  
**Priority Need** Homeless  
**Project Title** Emergency Solutions Grant – Emergency Shelter Operations

**Project Description**

The City will use Emergency Solutions Grant funding for operating costs of emergency shelter and transitional housing. The allocation process for ESG will occur during late summer or early fall when RFP will be published and sent to homeless services. ESG requires a 1 to 1 match so that applicants must provide 1 to 1 match by securing funds from foundations, the private sector, State funds, local funds or overall the 1 to 1 match may also be recognized within the total ESG program.

Objective Category: Suitable Living Environment ☒ Decent Housing Economic Opportunity

Outcome Category: ☒ Availability/Accessibility Affordability Sustainability

**Location:** Community Wide

<b>Objective Number</b>	<b>Project ID</b>	<b>Funding Sources:</b>	
Housing 4 Homeless 1 – 4	14	CDBG	
<b>HUD Matrix Code</b>	<b>CDBG Citation</b>	ESG	\$260,000
03C	570.201(C)	HOME	
<b>Type of Recipient</b>	<b>CDBG National Obj.</b>	HOPWA	
Subrecipient		Total Formula	\$260,000
<b>Start Date</b>	<b>Completion Date</b>	Prior Years Funding	
01/01/17	12/31/17	Assisted Housing	
<b>Performance Indicator</b>	<b>Annual Units</b>	PHA	
Number of Persons Served	2000 persons	Other Funding	
<b>Local ID</b>	<b>Units Upon Completion</b>	<b>Total (estimated)</b>	<b>\$260,000</b>
	2000 persons		

The primary project purpose assists ☒ The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs



**Table 3**

**Consolidated Plan Listing of Projects**

**Applicant's Name** City of Saint Paul, MN  
**Priority Need** Homeless  
**Project Title** Emergency Solutions Grant – Homeless Prevention Component

**Project Description**

The City will use Emergency Solutions Grant funding for homelessness prevention component. The allocation process for ESG will occur during late summer or early fall when RFP will be published and sent to homeless services. ESG requires a 1 to 1 match so that applicants must provide 1 to 1 match by securing funds from foundations, the private sector, State funds, local funds or overall the 1 to 1 match may also be recognized within the total ESG program.

Objective Category: Suitable Living Environment    ☒ Decent Housing    Economic Opportunity

Outcome Category:    ☒ Availability/Accessibility    Affordability    Sustainability

**Location:**    Community Wide

<b>Objective Number</b>	<b>Project ID</b>	<b>Funding Sources:</b>	
Housing 4 Homeless 1 – 4	14	CDBG	
<b>HUD Matrix Code</b>	<b>CDBG Citation</b>	ESG	\$94,000
03C	570.201(C)	HOME	
<b>Type of Recipient</b>	<b>CDBG National Obj.</b>	HOPWA	
Subrecipient		Total Formula	\$94,000
<b>Start Date</b>	<b>Completion Date</b>	Prior Years Funding	
01/01/17	12/31/17	Assisted Housing	
<b>Performance Indicator</b>	<b>Annual Units</b>	PHA	
Number of Households Served	100 households (approximately)	Other Funding	
		<b>Total Estimated</b>	<b>\$94,000</b>
<b>Local ID</b>	<b>Units Upon Completion</b>		
	100 households (approximately)		

The primary project purpose assists    ☒ The Homeless    Persons with HIV/AIDS    Persons with Disabilities    Public Housing Needs

**Table 3**

**Consolidated Plan Listing of Projects**

**Applicant's Name**                      City of Saint Paul, MN

**Priority Need**                              Homeless

**Project Title**                              Emergency Solutions Grant – Rapid Rehousing Program Component

**Project Description**

The City will use Emergency Solutions Grant funding for rapid rehousing program. The allocation process for ESG will occur during late summer or early fall when RFP will be published and sent to homeless services. ESG requires a 1 to 1 match so that applicants must provide 1 to 1 match by securing funds from foundations, the private sector, State funds, local funds or overall the 1 to 1 match may also be recognized within the total ESG program.

Objective Category:    Suitable Living Environment    ☒ Decent Housing    Economic Opportunity

Outcome Category:    ☒ Availability/Accessibility              Affordability              Sustainability

**Location:**              Community Wide

<b>Objective Number</b>	<b>Project ID</b>	<b>Funding Sources:</b>
Housing 4 Homeless 1 – 4	14	CDBG
<b>HUD Matrix Code</b>	<b>CDBG Citation</b>	ESG                      \$138,000
03C	570.201(C)	HOME
<b>Type of Recipient</b>	<b>CDBG National Obj.</b>	HOPWA
Subrecipient		Total Formula              \$138,000
<b>Start Date</b>	<b>Completion Date</b>	Prior Years Funding
01/01/17	12/31/17	Assisted Housing
<b>Performance Indicator</b>	<b>Annual Units</b>	PHA
Number of Households Served	Approximately 100 households	Other Funding
<b>Local ID</b>	<b>Units Upon Completion</b>	<b>Total (approximately) \$138,000</b>
	Approximately 100 households	

The primary project purpose assists    ☒ The Homeless    Persons with HIV/AIDS    Persons with Disabilities    Public Housing Needs

**Table 3**

**Consolidated Plan Listing of Projects**

**Applicant's Name** City of Saint Paul, MN

**Priority Need** Homeless

**Project Title** Emergency Solutions Grant – Administration

**Project Description**

The City will use Emergency Solutions Grant funding for administration of the Emergency Solutions Grant Program.

Objective Category: Suitable Living Environment    ☒ Decent Housing    Economic Opportunity

Outcome Category: ☒ Availability/Accessibility    Affordability    Sustainability

**Location:** Community Wide

<b>Objective Number</b>	<b>Project ID</b>	<b>Funding Sources:</b>	
Housing 4 Homeless 1 – 4	14	CDBG	
<b>HUD Matrix Code</b>	<b>CDBG Citation</b>	ESG	\$15,196
03C	570.201(C)	HOME	
<b>Type of Recipient</b>	<b>CDBG National Obj.</b>	HOPWA	
Subrecipient		Total Formula	\$15,196
<b>Start Date</b>	<b>Completion Date</b>	Prior Years Funding	
01/01/17	12/31/17	Assisted Housing	
<b>Performance Indicator</b>	<b>Annual Units</b>	PHA	
Number of Persons Served	Approximately 3,000 persons served	Other Funding	
<b>Local ID</b>	<b>Units Upon Completion</b>	<b>Total (estimated)</b>	<b>\$15,196</b>
	Approximately 3,000 persons served	(less than allowable 7.5% of overall grant award)	

The primary project purpose assists ☒ The Homeless    Persons with HIV/AIDS    Persons with Disabilities    Public Housing Needs

**Table 3**

**Consolidated Plan Listing of Projects**

**Applicant's Name** City of Saint Paul, MN  
**Priority Need** Homeless  
**Project Title** Emergency Solutions Grant – HMIS Component

**Project Description**

The City will use Emergency Solutions Grant funding for HMIS component for the Emergency Solutions Grant Program.

Objective Category: Suitable Living Environment    ☒ Decent Housing    Economic Opportunity

Outcome Category: ☒ Availability/Accessibility    Affordability    Sustainability

**Location:** Community Wide

<b>Objective Number</b> Housing 4 Homeless 1 – 4	<b>Project ID</b> 14	<b>Funding Sources:</b>  CDBG  ESG                      \$18,000  HOME  HOPWA  Total Formula              \$18,000  Prior Years Funding  Assisted Housing  PHA  Other Funding  <b>Total (estimated) \$18,000</b>
<b>HUD Matrix Code</b> 03C	<b>CDBG Citation</b> 570.201(C)	
<b>Type of Recipient</b> Subrecipient	<b>CDBG National Obj.</b>	
<b>Start Date</b> 01/01/17	<b>Completion Date</b> 12/31/17	
<b>Performance Indicator</b> Number of Persons Served	<b>Annual Units</b> Approximately 3,000 persons served	
<b>Local ID</b>	<b>Units Upon Completion</b> Approximately 2,500 persons served	

The primary project purpose assists    ☒ The Homeless    Persons with HIV/AIDS    Persons with Disabilities    Public Housing Needs



## **CITY OF SAINT PAUL**

### **2017-2018 EMERGENCY SOLUTIONS GRANT PROGRAM – ACTION PLAN**

**OVERVIEW:** For HUD FY 2017-2018, the City intends to allocate its Emergency Solutions Grant (“ESG”) funds to agencies that provide homeless prevention services, emergency shelter facilities, transitional housing, rapid rehousing services, counseling services, street outreach services, and data collection. The ESG funds will be awarded after the proposals are reviewed by the City with consultation with Ramsey County Continuum of Care Coordinator, City Council, and Mayor’s Administration. In general, approximately 19 community agencies that serve Saint Paul residents who are homeless or at-risk of being homeless apply annually for ESG funds for which the City Council considers for final approval. In consideration of HUD national objectives, the City’s Emergency Solutions Grant Program places additional emphasis on rapid rehousing services and street outreach.

During HUD FY 2017, the City will partner with Ramsey County to implement the County’s Continuum of Care program which provides homelessness prevention and rapid rehousing services to homeless single adults, homeless families, and homeless youth. During the HUD year, the City and County staff will participate with the Ramsey County Continuum of Care (“COC”) Coordinator and community agencies to implement a coordinated entry and coordinated assessment for single adults and homeless youth, when appropriate. Furthermore, the City will participate with the Ramsey County COC Governing Board, and Ramsey County FHAP Committee to implement *Heading Home Ramsey* – a comprehensive plan to end homelessness in Ramsey County.<sup>1</sup>

At the same time, the City of Saint Paul owns the Saint Paul Residence which provides 120 units of support housing, including 60 units for chronically-inebriated residents. Additionally, during 2017, City staff will work Catholic Charities to seek financing for the new Dorothy Day Center Higher Ground Phase 2 facility, which will have an “Opportunity Center” and permanent supportive housing that can respond to the increasing service demands of homeless residents using the Dorothy Day Center.

Throughout the HUD year, the City will support innovative programs that serve homeless residents with mental illness. As an example, the Saint Paul Police Department works with Listening House and

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

South Metro Human Services to develop police services responsive to homeless residents with mental illness. Additionally, the Police Department and Listening House co-chair the Police-Community Forum to address the needs of downtown Saint Paul homeless residents. One result of the community forum discussions was an ESG funding allocation for Catholic Charities' rapid rehousing program with street outreach to homeless residents who use the Downtown Saint Paul Central Library during the day.

As the ESG administrator, the City supports the participation of homeless residents on various issues and projects, such as the Ramsey County Continuum of Care and the Family Homelessness Prevention Assistance Program Committee. It is encouraging to see some formerly-homeless residents become more empowered by their ongoing participation with these committees.

Finally, it should be noted that CDBG funds are allocated to the Block Nurse and Neighborhood Non-Profit programs which provide assistance for homeless persons as well as persons with special needs. Moreover, the City is fortunate to have the Health Care for the Homeless (HCH) clinics that generally serve approximately 3500 unduplicated homeless residents annually at eight shelter and drop-in centers in Saint Paul. This program receives federal grant funds allocated from the Stewart McKinney-Bruce Vento Act to End Homelessness. The Health Care for the Homeless remains an essential service for our homeless residents. Furthermore, Catholic Charities' Dorothy Day Center Higher Ground has new medical respite designated housing units to assist emergency shelter residents who are "medically-compromised."

#### **2017-2018 ESG § 576.100 General provisions and expenditure limits.**

For HUD FY 2017, the City of Saint Paul will allocate its ESG funds to five program components street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and HMIS; as well as administrative activities. The five program components and the eligible activities that may be funded under each are set forth in 24 CFR §576.101 through §576.107. Eligible administrative activities are set forth in 24 CFR §576.108.

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

- (1) 60 percent of the recipient's fiscal year grant totaling \$574,696; or
- (2) The amount of Fiscal Year 2010 ESG grant was \$350,982.
- (3) The City will allocate up to 60% of its fiscal year grant to street outreach and emergency shelter activities.

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

## 2017-2018 ESG STREET OUTREACH COMPONENT

Pursuant to C.F.R. §24 576.102., the City's ESG funds may be used for street outreach if provided to homeless youth or homeless single adults who live outside and have mental health challenges. The maximum allocation for street outreach will be \$49,500 for HUD FY 2017. Sub recipients that request ESG funds for street outreach must comply with C.F.R. §24 576.101, as follows:

- (a) *Eligible costs.* Subject to the expenditure limit in §576.100(b), ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. For the purposes of this section, the term "unsheltered homeless people" means individuals and families who qualify as homeless under paragraph (1)(i) of the "homeless" definition under §576.2. The eligible costs and requirements for essential services consist of:
  - (1) *Engagement.* The costs of activities to locate, identify, and build relationships with unsheltered homeless people and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs. These activities may include initial needs assessment, eligibility assessment; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting homeless residents to appropriate services, including mainstream social services and housing programs, such as emergency shelter, community-based services, permanent supportive housing, and rapid re-housing programs. Eligible costs may include the cell phone costs for street outreach workers during the performance of these activities.
  - (2) *Case management.* The cost of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant. Eligible services and activities are as follows: using the centralized or coordinated assessment system; conducting the initial evaluation required under §576.401(a), including verifying and documenting eligibility; counseling; coordinating services; obtaining Federal, State, and local benefits; monitoring and evaluating program participant progress; providing information and referrals to other providers; and developing an individualized housing and service plan, including planning for permanent housing stability.
  - (3) *Transportation.* The transportation costs of travel by outreach workers or other service providers are eligible, provided travel occurs during the provision of eligible services. The costs of transporting unsheltered people to emergency shelters or other service facilities are also eligible.



- (4) *Services for special populations.* ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs (a)(1) through (a)(3) of this section.
- (b) *Minimum period of use.* The subrecipient must provide services to homeless individuals and families for the period during which ESG funds are provided.
- (c) *Maintenance of effort.* The City's ESG funds will not be used to replace funds the local government provided for street outreach and emergency shelter services during the immediately preceding 12-month period, unless HUD determines that the unit of general purpose local government is in a severe financial deficit.

## **2017-2018 ESG EMERGENCY SHELTER COMPONENT**

In recognition of the local needs, the City's 2017-2018, ESG funds places a high priority on paying operational costs for emergency shelters (homeless adults, homeless families, and homeless youth), and transitional housing (homeless women and homeless families) operations. That said, the City will may allocate ESG funds for rehabilitations, conversions or building renovations. Sub-recipients requesting ESG funds for emergency shelter and essential services must comply with C.F.R. §24 576.102, as follows:

- (a) *General.* Subject to the expenditure limit in §576.100(b), ESG funds may pay for providing essential services to homeless families and individuals in emergency shelters and operating costs emergency shelters, including transitional housing.
- (b) *Essential services* may include case management, including using the centralized or coordinated assessment system. However, it must be noted that the Ramsey County and community agencies have developed coordinated assessment for families (funded with State of Minnesota funds). This coordinated assessment process includes screening, initial evaluation, and diversion. At this time, Ramsey County COC is working with community services providers to implement the coordinated assessment process for homeless individuals and homeless youth – also subject to availability of funding. As necessary, coordinated assessment will include more intensive evaluation in order to provide referral to emergency shelter or other community services. Eligible activities could include:
  - (1) Conducting the initial evaluation required under §576.401(a), including verifying and documenting eligibility;
  - (2) Counseling;
  - (3) Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;
  - (4) Monitoring and evaluating program participant progress;
  - (5) Providing information and referrals to other providers;

- (6) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
- (7) Developing an individualized housing and service plan, including planning a path to permanent housing stability.

(c) *Shelter operations.* For HUD FY2017, Saint, Paul ESG funds may pay eligible operating costs of emergency shelters or transitional housing, such as maintenance costs (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. NOTE: The ESG-Emergency Shelter Program Component is essential to the Heading Home Ramsey Plan. Therefore, in consultation with Ramsey County Continuum of Care and Saint Paul homeless service providers, the City places a high priority of allocating ESG funds for emergency shelter operations.

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

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

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

*Minimum period of use.* Where ESG funds are used solely for essential services or shelter operations, the subrecipient must provide services or shelter to homeless individuals and families for the period during which ESG funds are provided. The subrecipient does not need to limit these services or shelter to a particular site or structure, so long as the site or structure serves the same type of persons originally served with the assistance or serves homeless persons in the same area where the subrecipient originally provided the services or shelter.

## **HUD YR 2017-2018 ESG HOMELESSNESS PREVENTION ASSISTANCE**

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

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

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

The costs of homelessness prevention activities are only eligible to the extent that homelessness prevention assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into permanent housing and achieve stability in that housing. Homelessness prevention must be provided in accordance with the housing and stabilization services requirements in C.F.R. §24 576.05, the short-term and medium rental assistance in C.F.R. §24 576.106, and the written standards and procedures established under C.F.R. §24 576.400

### **RISK FACTORS FOR DETERMINING ELIGIBILITY- PREVENTION ASSISTANCE.**

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

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

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

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

#### **ELIGIBLE POPULATION (C.F.R. §24.576.2) – HOMELESSNESS PREVENTION**

*At risk of homelessness means.*

- (1) An individual or family who:
  - (i) Has an annual income below 30 percent of median family income for the area median income (AMI) area as determined by HUD;
  - (ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “homeless” definition in this section; and
  - (iii) Meets one of the following conditions:
    - (A) Has moved because of economic reasons two or more times during the sixty (60) days immediately preceding the application for homelessness prevention
    - (B) Is living in the home of another because of economic hardship
    - (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance
    - (D) Lives in a hotel or motel and the cost of the hotel and motel stay is not paid or living situation will be terminated within 21 days after the date of application for assistance;
    - (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons per room, as defined by U.S. Census Bureau;
    - (F) Is existing in a publicly funded institution, or system of care (such as a healthcare facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
    - (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved consolidated plan.



- (2) A child or youth who does not qualify as “homeless” under this definition, but qualifies under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637(11) of the Head Start Act (42, U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), Section 330(h)(5)(A) of the Public Health Services Act (42 U.S.C. 254(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7, U.S.C 2012(m)), section 17(b)(15) of the Child Nutrition Act of 1966 (42. U.S.C. 1786(b)(15))
- (3) A child or youth who does not qualify as “homeless” under this definition, but qualifies under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a (2)), and the parent(s) or guardian(s) of the child or youth if living with him or her. OR
- (4) An individual or family who will imminently lose their primary nighttime residence, provided that;
  - (i) The primary nighttime residence will be lost within 14 days of the date of the application for homeless assistance;
  - (ii) No subsequent residence has been identified; and
  - (iii) The individual or family lacks the resources or support networks, e.g. family, friends, faith-based or other social networks needed to obtain other permanent housing;
- (5) Any individual or family who:
  - (i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence against the individual or family member, including a child Is fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
  - (ii) Has no other residence; and
  - (iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing

## **ELIGIBLE ACTIVITIES**

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

## **HUD YR 2017-2018 ESG RAPID RE-HOUSING ASSISTANCE COMPONENT.**

ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible from an emergency shelter into permanent housing and achieve stability in that housing. This rapid re-housing assistance, may be provided to program participants who meet the criteria under paragraph (1) of the “homeless” definition in §576.2 or who meet the criteria under paragraph (4) of the “homeless” definition and live in an emergency shelter or other place described in paragraph (1) of the “homeless” definition. The rapid re-housing assistance must be provided in accordance with the housing relocation and stabilization services requirements in §576.105, the short- and medium-term rental assistance requirements in §576.106, and the written standards and procedures established under §576.400.

### **ELIGIBLE PROGRAM PARTICIPANTS – RAPID RE-HOUSING:**

For 2017, ESG rapid re-housing assistance may assist extremely low-income adults, families, and youth/young adults who meet the criteria of “homeless” as defined in CFR 24, §576.2, as follows:

- (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
  - (i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport or camping ground;
  - (ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
  - (iii) An individual who is exiting an institution where he or she resided for ninety (90) days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
- (2) An individual or family who will imminently lose their primary nighttime residence, provided that
  - (i) The primary nighttime residence will be lost within 14 days of the date of the application for homeless assistance; and
  - (ii) No subsequent residences has been identified; and
- (iii) The individual or family lacks the resources or support networks (i.e. family, friends, faith-based or social networks, needed to obtain other permanent housing

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



## **WRITTEN STANDARDS AND PROCEDURES FOR RAPID RE-HOUSING PROGRAM**

See applicable provisions under §576.400.

### **ELIGIBLE ACTIVITIES FOR ESG RAPID RE-HOUSING PROGRAM**

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

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

ESG funds may be used to provide housing relocation and stabilization services, short term rental assistance and/or medium rental assistance as necessary to assist homeless individuals or homeless families move as quickly as possible out of emergency shelters into permanent housing. Rapid re-housing assistance must be provided in accordance with the housing relocation and stabilization service requirements in 24 CFR § 576.105, the short-term rental assistance and medium rental assistance in 24 CFR § 576.106; and the written standards and procedures in 24 CFR § 576.400. ESG-2 funds may provide the following:

1. Financial Assistance.

ESG financial assistance is limited to the following activities: short-term rental assistance, medium-term rental assistance, security deposits, utility deposits, and moving cost assistance. Sub-recipients will not make payments directly to program participants, but only to third parties, such as landlords or utility companies.

*Short and Medium Term Rental Assistance (C.F.R. 24 §576.016)*

To receive either short-term or medium-term rental assistance, the following conditions must occur:

- Short-term rental assistance is assistance for up to three months of rental costs.
- Medium-term rental assistance is assistance for more than three months but not more than 24 months
- Monthly rent assistance may be \$400 for 1 bedroom; \$600 for a 2 bedroom; and \$800 for a three bedroom or larger, or an amount that sub-recipient has determined to be reasonable – especially given the tight rental market.
- No program participant may receive more than 12 months of assistance under ESG Rapid Rehousing.
- After 3 months, if program participants receiving short-term rental assistance need additional financial assistance to remain housed, they must be evaluated for eligibility for medium-term rental assistance, for a total of 12 months.
- ESG Rapid Re-Housing assistance should be “needs-based,” meaning that sub-recipient should determine the amount of assistance based on the minimum amount needed to assist homeless resident secure housing.
- The rental assistance paid cannot exceed the actual rental cost, which must be in compliance with HUD’s standard of “rent reasonableness.”
- Rental assistance payments cannot be made on behalf of eligible individuals or families for the same period of time and for the same cost types that are being provided through another federal, state or local housing subsidy program.
- Compliance with Fair Market Rents (FMR) and Rent Reasonableness; and
- For purposes of calculating rent, the rent must equal the sum of the total rent, and rental fees (excluding late fees and pet deposits), and if tenants pays separately for utilities (excluding telephone) the monthly allowance for utilities as established by the public housing authority for the area in which the housing is located; and
- Compliance with minimum habitability standards; and
- Tenant-based rental assistance (participants select housing) or project-based rental assistance (grantee selects housing that meet ESG requirements and execute rental assistance agreements with the owner with a subsidy for the unit so eligible program participants can access to the unit); and
- A standard rental agreement must be in place; and
- No rental assistance will be provided to households receiving assistance from other public source for same time period (exception: rental arrears).

**Security Deposits:** ESG Rapid Re-Housing funds may pay security deposits, including utility deposits, for eligible program participants. In contrast to the requirements regarding rental assistance payments, security and utility deposits covering the same period of time in which assistance is being provided through another housing subsidy program are eligible as long as they cover separate cost types.

**Moving Expense:** ESG-2 Rapid Re-housing funds may pay reasonable moving costs, such as truck rental.

2. Housing Relocation and Stabilization Services.

Subrecipient will provide housing relocation and stabilization activities under 24.CFR §576.105. ESG Rapid Re-Housing funds may pay services that assist program participants with housing stability and placement. Each program participant may receive housing relocation and stabilization services for up to 12 months.

Subject to the general conditions under 24 C.F.R. §576.104, ESG funds may pay housing owners, utility companies, and other third parties for the following costs.

Rental Application fees: ESG funds may pay for the rental housing application fee that is charged by the owner to applicants.

Security Deposits: ESG funds may pay for a security deposit that is equal to no more than two (2) months' rent

Last month's rent: If necessary to obtain housing for a program participant, the last month's rent may be paid from ESG funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one months' rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any three year period.

Utility Deposits: ESG funds may pay for a standard utility deposit required by the utility company for all customers for the utilities listed in paragraph (5) of this section.

Utility payments: ES funds may pay up to six months of utility payments per program participant.

Moving Costs: ESG may pay reasonable moving costs, such as a truck rental.

Services costs: Subject to the general restrictions under 24 C.F.R. §576.104, ESG funds may pay the costs of providing the following services.

Housing Search and placement: Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing, including the following assessment of housing barriers, needs, and preferences; developing a housing search action plan outreach to and negotiations with owners; assistance with submitting rental applications and understanding leases; assessment of housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness; assistance with obtaining utilities and making moving arrangements; and tenant counseling.

Housing Stability Case Management: ESG funds may pay costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to assist a program

participant in overcoming immediate barriers to obtaining housing. Components services and activities consist of:

- Using the centralized or coordinated assessment system when developed to evaluate individuals and families applying for rapid re-housing assistance;
- Conducting the initial evaluation required under §576.400(1)(a), including verifying and documenting eligibility, for individuals and families applying for rapid re-housing assistance;
- Counseling;
- Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;]
- Monitoring and evaluating program participants' progress;
- Providing information and referrals to other providers
- Developing an individualized housing and service plan, including planning a path to permanent housing stability; and
- Conducting re-evaluations required under §576.401(b).

Case manager will meet with participants at least monthly for the duration of the assistance (participants who are victims of domestic violence are exempt if meeting increases the risk of danger to client). Case manager will develop individualized plans to help program participants overcome immediate barriers to secure permanent housing, and provide assistance to stabilize occupancy after ESG assistance ends. Case manager will also monitor and re-evaluate program participants, as necessary.

Legal Services: ESG may pay for legal services as set forth in §576.102(a)(1)(vi) except that the eligible subject matters also include landlord/tenant matters, and the legal services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing.

Credit Repair: ESG funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit program. This assistance does not include the payment or modification of a debt.



## Ineligible and Prohibited Activities

- Financial assistance may not pay for any mortgage costs or costs needed by homeowners to assist with any fees, taxes, or other costs of refinancing a mortgage to make it affordable.
- ESG funds may not pay any of the following items: construction or rehabilitation; credit card bills or other consumer debt; car repair or other transportation costs; travel costs; food; medical or dental care and medicines; clothing and grooming; home furnishings; pet care; entertainment activities; work or education related materials; and cash assistance to program participants. ESG may not be used to develop discharge planning programs in mainstream institutions such as hospitals, jails, or prisons. Finally, while training for case managers and program administrators is an eligible administrative cost as long as it is directly related to ESG Rapid Re-Housing program operations, ESG may not be used to pay for certifications, licenses, and general training classes.
- Programs may not charge fees to program participants.
- Any ESG funds used to support program participants must be issued directly to the appropriate third party, such as the landlord or utility company, and in no case are funds eligible to be issued directly to program participants.

## § 576.105 HOUSING RELOCATION AND STABILIZATION SERVICES

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

- (a) Financial Assistance costs: Subject to the general conditions under 24 C.F.R. §576.104, ESG funds may pay housing owners, utility companies, and other third parties for the following costs.
  - (1) *Rental Application fees*: ESG funds may pay for the rental housing application fee that is charged by the owner to applicants.
  - (2) *Security Deposits*: ESG funds may pay for a security deposit that is equal to no more than two (2) months' rent or an amount that sub-recipient has determined reasonable given the existing tight rental market.
  - (3) *Last month's rent*: If necessary to obtain housing for a program participant, the last month's rent may be paid from ESG-2 funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one months' rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any three year period.
  - (4) *Utility deposits*. ESG funds may pay for a standard utility deposit required by the utility company for all customers for the utilities listed in paragraph (5) of this section.

- (5) *Utility payments.* ESG funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water, and sewage. No program participant shall receive more than 24 months of utility assistance within any 3-year period.
- (6) *Moving costs.* ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance under paragraph (b) of this section and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.
- (7) Hotel or motel rental costs: ESG funds may pay short-term hotel or motel costs when necessary to assist a homeless families prior to securing stable housing.
- (b) Services costs. Subject to the general restrictions under §576.103 and §576.104, ESG funds may be used to pay the costs of providing the following services:
  - (1) *Housing search and placement.* Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing, include the following:
    - (i) Assessment of housing barriers, needs, and preferences;
    - (ii) Development of an action plan for locating housing;
    - (iii) Housing search;
    - (iv) Outreach to and negotiation with owners;
    - (v) Assistance with submitting rental applications and understanding leases;
    - (vi) Assessment of housing for compliance with Emergency Solutions Grant (ESG) requirements for habitability, lead-based paint, and rent reasonableness;
    - (vii) Assistance with obtaining utilities and making moving arrangements; and
    - (viii) Tenant counseling.
  - 2) *Housing stability case management.* ESG funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to



facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. Component services and activities consist of:

- (A) Using the centralized or coordinated assessment system as required under §576.400(d), to evaluate individuals and families applying for or receiving homelessness prevention or rapid re-housing assistance;
  - (B) Conducting the initial evaluation required under §576.401(a), including verifying and documenting eligibility, for individuals and families applying for homelessness prevention or rapid re-housing assistance;
  - (C) Counseling;
  - (D) Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;
  - (E) Monitoring and evaluating program participant progress;
  - (F) Providing information and referrals to other providers;
  - (G) Developing an individualized housing and service plan, including planning a path to permanent housing stability; and
  - (H) Conducting re-evaluations required under §576.401(b).
- (3) *Mediation.* ESG funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.
- (4) *Legal services.* ESG funds may pay for legal services, as set forth in §576.102(a)(1)(vi), except that the eligible subject matters also include landlord/tenant matters, and the legal services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.
- (5) *Credit repair.* ESG funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.
- (c) *Maximum amounts and periods of assistance.* The recipient may set a maximum dollar amount that a program participant may receive for each type of financial assistance under paragraph (a) of this section. The recipient may also set a maximum period for which a program participant may receive any of the types of assistance or services under

this section. However, except for housing stability case management, the total period for which any program participant may receive the services under paragraph (b) of this section must not exceed 24 months during any 3-year period. The limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family.

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

#### **§576.106 SHORT AND MEDIUM TERM RENTAL ASSISTANCE**

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

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

- a) *General provisions.* Subject to the general conditions under §576.103 and §576.104, the subrecipient may provide a program participant with up to 24 months of rental assistance during any 3-year period. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.
  - (1) Short-term rental assistance is assistance for up to 3 months of rent.
  - (2) Medium-term rental assistance is assistance for more than 3 months but not more than 12 months of rent.
  - (3) Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.
  - (4) Rental assistance may be tenant-based or project-based, as set forth in paragraphs (h) and (i) of this section.
- (b) *Discretion to set caps and conditions.* Subject to the requirements of this section, the recipient may set a maximum amount or percentage of rental assistance that a program participant may receive, a maximum number of months that a program participant may receive rental assistance, or a maximum number of times that a program participant may receive rental assistance. The recipient may also require program participants to share in the costs of rent. For the purpose of this section, the City is requiring the following conditions:

### Homelessness Prevention Program and Rapid Rehousing Program

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

### Homelessness Prevention Program:

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

### Rapid Re-Housing Programs:

To receive either short-term or medium-term rental assistance, the following conditions must occur:

- (1) For the purpose of this section, medium-term rental assistance is defined as up to 12 months.
  - (2) For FY 2017, monthly rent assistance will be up to \$400 for 1 bedroom; up to \$600 for a 2 bedroom; and up to \$800 for a three bedroom or larger, or an amount deemed sufficient to secure stable housing within the existing tight rental market.
  - (3) Program participants must be evaluated for eligibility for medium-term rental assistance after every three 3 months
  - (4) Rapid Re-Housing assistance should be “needs-based,” meaning that case manager should determine the amount of assistance based on the minimum amount needed to assist homeless resident secure housing.
  - (5) Case Manager and program participant must developed an agreed-upon case management plan
- (c) *Use with other subsidies.* Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance, or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources. Rental assistance may

not be provided to a program participant who has been provided with replacement housing payments under the URA during the period of time covered by the URA payments.

- d) *Rent restrictions.* (1) Rental assistance cannot be provided unless the rent does not exceed the Fair Market Rent established by HUD, as provided under 24 CFR part 888, and complies with HUD's standard of rent reasonableness, as established under 24 CFR 982.507.
- (2) For purposes of calculating rent under this section, the rent shall equal the sum of the total monthly rent for the unit, any fees required for occupancy under the lease (other than late fees and pet fees) and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the public housing authority for the area in which the housing is located.
- (e) *Rental assistance agreement.* The recipient or subrecipient may make rental assistance payments only to an owner with whom the recipient or subrecipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the recipient or subrecipient a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant.
- (f) *Late payments.* The recipient or subrecipient must make timely payments to each owner in accordance with the rental assistance agreement. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. The recipient or subrecipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.
- (g) *Lease.* Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks. For program participants living in housing with project-based rental assistance under paragraph (i) of this section, the lease must have an initial term of one year.
- (h) *Tenant-based rental assistance.* (1) A program participant who receives tenant-based rental assistance may select a housing unit in which to live and may move to another unit or building and continue to receive rental assistance, as long as the program participant continues to meet the program requirements.
- (2) The recipient may require that all program participants live within a particular area for the period in which the rental assistance is provided.



(3) The rental assistance agreement with the owner must terminate and no further rental assistance payments under that agreement may be made if:

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

(i) *Project-based rental assistance.* If the recipient or subrecipient identifies a permanent housing unit that meets ESG requirements and becomes available before a program participant is identified to lease the unit, the recipient or subrecipient may enter into a rental assistance agreement with the owner to reserve the unit and subsidize its rent in accordance with the following requirements:

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

subrecipient commit ESG funds to be expended beyond the expenditure deadline in §576.203 or commit funds for a future ESG grant before the grant is awarded.

- (j) *Changes in household composition.* The limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family.

#### **HMIS COMPONENT (C.F.R. 24 §576.107)**

*HMIS Data Collection:* Pursuant to 24 CFR §576.107, sub-recipients will administer HMIS as required to implement ESG. For 2017, the City will work with Ramsey County COC and ESG sub-recipients to comply with future HUD guidance relating to HMIS operations. The sub-recipient may use ESG funds to pay the costs of contributing data to HMIS. HMIS costs will be limited to three (3) percent of the grant.

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

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

- a) *Eligible costs.* The City of Saint Paul may use up to 7.5 percent of its ESG grant for the payment of administrative costs related to the planning and execution of ESG activities. This does not include staff and overhead costs directly related to carrying out activities eligible under §576.101 through §576.107, because those costs are eligible as part of those activities. Eligible administrative costs include:
  - (1) *General management, oversight and coordination.* Costs of overall program management, coordination, monitoring, and evaluation. These costs include, but are not limited to, necessary expenditures for the following:
    - (i) Salaries, wages, and related costs of the recipient's staff, the staff of sub-recipients, or other staff engaged in program administration. In charging costs to this category, the recipient may either include the entire salary, wages, and related costs allocable to the program of each person whose *primary* responsibilities with regard to the program involve program administration assignments, or the pro rata share of the salary, wages, and related costs of each person whose job includes *any* program administration assignments. The recipient may use only one of these methods for each fiscal year grant. Program administration assignments include the following:
      - (A) Preparing program budgets and schedules, and amendments to those budgets and schedules;



- (B) Developing systems for assuring compliance with program requirements;
- (C) Developing interagency agreements and agreements with sub recipients and contractors to carry out program activities;
- (D) Monitoring program activities for progress and compliance with program requirements;
- (E) Preparing reports and other documents directly related to the program for submission to HUD;
- (F) Coordinating the resolution of audit and monitoring findings;
- (G) Evaluating program results against stated objectives; and
- (H) Managing or supervising persons whose primary responsibilities with regard to the program include such assignments as those described in paragraph (a)(1)(i)(A) through (G) of this section.

(ii) Travel costs incurred for monitoring of sub recipients;

(iii) Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services; and

(iv) Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space.

- (2) *Training on ESG requirements.* Costs of providing training on ESG requirements and attending HUD-sponsored ESG trainings.
- (3) *Consolidated plan.* Costs of preparing and amending the ESG and homelessness-related sections of the consolidated plan in accordance with ESG requirements and 24 CFR part 91.
- (4) *Environmental review.* Costs of carrying out the environmental review responsibilities under §576.407.
- b) *Sharing requirement. (2) Territories, metropolitan cities, and urban counties.* If the recipient is a territory, metropolitan city, or urban county, the recipient may share its funds for administrative costs with its sub recipients

#### **§ 576.109 INDIRECT COSTS.**

- (a) *In general.* ESG grant funds may be used to pay indirect costs in accordance with OMB Circular A-87 (2 CFR part 225), or A-122 (2 CFR part 230), as applicable.

- (b) *Allocation.* Indirect costs may be allocated to each eligible activity under §576.101 through §576.108, so long as that allocation is consistent with an indirect cost rate proposal developed in accordance with OMB Circular A–87 (2 CFR part 225), or A–122 (2 CFR part 230), as applicable.
- (c) *Expenditure limits.* The indirect costs charged to an activity subject to an expenditure limit under §576.100 must be added to the direct costs charged for that activity when determining the total costs subject to the expenditure limit.

#### Subpart E—Program Requirements

##### § 576.400 Area-wide systems coordination requirements.

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

- (6) Healthcare for the Homeless (42 CFR part 51c) – The City allocates ESG funds to the Healthcare for the Homeless Program in the City of Saint Paul.
  - (8) Programs for Runaway and Homeless Youth (Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq. )); The City allocates ESG fund to Ain Dah Yung, Lutheran Social Services, and SafeZone – to assist runaway and homeless youth.
  - (9) Supportive Services for Veteran Families Program (38 CFR part 62) – Minnesota Assistance Council for Veterans is a grant recipient for this program which can serve Saint Paul veterans.
- c) *System and program coordination with mainstream resources.* The City of Saint Paul and its sub-recipients coordinate and integrate, to the maximum extent practicable, ESG-funded activities with mainstream housing, health, social services, employment, education, and youth programs for which families and individuals at risk of homelessness and homeless individuals and families may be eligible. Examples of these programs include:
- (1) Public housing programs assisted under section 9 of the U.S. Housing Act of 1937 (42 U.S.C. 1437g) (24 CFR parts 905, 968, and 990);
  - (2) Housing programs receiving tenant-based or project-based assistance under section 8 of U.S. Housing Act of 1937 (42 U.S.C. 1437f) (respectively 24 CFR parts 982 and 983);
  - (3) Supportive Housing for Persons with Disabilities (Section 811)
  - (4) HOME Investment Partnerships Program (24 CFR part 92);
  - (5) Temporary Assistance for Needy Families (45 CFR parts 260–265);
- (d) *Centralized or coordinated assessment.* The Continuum of Care has developed a centralized assessment system or a coordinated assessment system homeless families, homeless individuals, and homeless youth seeking emergency shelter. Therefore, each ESG-funded program, as appropriate, must use that assessment system. The City and sub-recipients must continue to work with the Continuum of Care to ensure the screening, assessment and referral of program participants are consistent with the written standards required by HUD. During 2017, the City will work with Ramsey County Continuum of Care, as appropriate, to implement the centralized assessment system to single adults and homeless youth, pending availability of funding.

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

All program participants will pay 30% of their income toward rent. If household income increases after three months, then ESG payment will decrease.

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

**Minnesota Housing INSTRUCTIONS FOR PREPARING AN  
AFFIRMATIVE FAIR HOUSING MARKETING PLAN**

1. **Introduction** - The Affirmative Fair Housing Marketing Regulations require that each applicant carry out an affirmative marketing program to attract prospective buyers or tenants of all majority and minority groups in the housing market area regardless of race, creed, color, religion, sex, national, origin, marital status, status with regard to public assistance, disability, sexual orientation, or familial status. The applicant shall describe on this form the activities it proposes to carry out during advance marketing, where applicable, and the initial sales or rent-up period. The affirmative marketing program also should assure that any group(s) of persons normally NOT likely to apply for the housing without special outreach efforts (*because of existing neighborhood racial or ethnic patterns, location of housing in the Standard Metropolitan Statistical Areas (SMSA), price, or other factors*), know about the housing, feel welcome to apply, and have the opportunity to buy or rent. In addition to the specific advertising activities, please describe activities relating to instructions to staff on fair housing concerns.
2. **Part 2 - Applicant and Project Identification.** Parts A, B, C and D are self-explanatory. With respect to Part E, specify approximate starting date of marketing activities to the groups targeted for special outreach and the anticipated date of initial occupancy. Part F is to be completed only if the applicant is not to implement the plan on its own. For Part G, indicate HOUSING funding sources.
3. **Part 3 - Type of Affirmative Marketing Plan.** Applicants for multifamily and subdivision projects are to submit a Project Plan which describes the marketing program for the particular project or subdivision. Scattered site builders are to submit individual annual plans based on the racial composition of the geographical area. For example, if a builder plans to construct units in both minority and non-minority geographical areas, separate plans shall be submitted for all of the housing proposed for both types.
4. **Part 4 - Direction of Marketing Activity.** Indicate which group(s) you believe are "least likely to apply" without special outreach. Considering factors such as price or rental of housing, the racial/ethnic characteristics of the neighborhood in which housing is (*or is to be*) located, and the population within the housing market area, public transportation routes, etc.
5. **Part 5 - Marketing Program.** The applicant shall describe the marketing program to be used to attract all segments of the eligible population, especially those groups designated in Part 4 of the Plan as "least likely to apply". The applicant shall state: the type of media to be used, the names of newspapers/call letters of radio or TV stations; the identity of the circulation or audience of the media identified in the Plan, e.g., Black/African American, American Indian/Alaskan Native, Asian, Hispanic/Latino, Native Hawaiian/Pacific Islander or White; duration of newspaper advertising, length and size of the ad; and frequency of broadcast advertising. Community contacts include individuals or organizations that are well known in the project area or the locality, and can influence persons within the groups considered "least likely to apply". Such contacts may include, but need not be limited to: neighborhood, minority and women's organizations, churches, labor unions, employers, public and private agencies, and individuals who are associated with these organizations and/or are well-known in the community.
6. **Part 6 - Future Marketing Activities.** State how you intend to continue your affirmative marketing efforts to maintain attained goals or correct any current occupancy concerns.
7. **Part 7 - Experience and Staff Instructions.**
  - a. Indicate whether the applicant has previous experience in marketing housing to group(s) identified as "least likely to apply" for the housing".
  - b. Describe the instructions and training given to sales/rental staff. This guidance to staff must include information regarding federal, state and local fair housing laws and this Affirmative Fair Housing Marketing Plan. Copies of any written materials should be submitted with the Plan, if such materials are available.



8. **Part 8 - Additional Considerations.** In this section, describe other efforts, not mentioned previously, which are planned to attract persons in either those groups already identified in Part 4 of the Plan, “as “least likely to apply” for the housing” or in groups not previously identified in the Plan. Such efforts may include outreach activities to female-headed households.
9. **Part 9 - Current Occupancy or Anticipated Occupancy for New Projects.** For existing developments, list your current occupancy (by Head of Household) broken down in the categories provided. For new projects, list the numbers you anticipate will occupy the units.
10. **Part 10 - Signatures.** The applicant's authorized agent signs the Affirmative Fair Housing Marketing Plan at the bottom and dates it. By signing the Plan, the applicant assumes full responsibility for its implementation. The Agency may at any time monitor the implementation of the Plan and request modification in its format or content, where the Agency deems necessary.
11. **Notice of Intent to Begin Marketing.** At least 90 days before the start of sales or rental marketing activities the applicant with an approved Affirmative Fair Housing Marketing Plan shall submit notice of intent to begin marketing, if applicable. This notice is submitted either orally or in writing to the assigned HMO (Housing Management Officer) or HDO (Housing Development Officer) of Minnesota Housing.



**Supplemental Instructions for Preparing Minnesota Housing Affirmative Fair Housing Marketing Plan (AFHMP)**

**NOTE:** It is preferred the AFHMP is typed. Legible printing in ink may be accepted. Completed form can be emailed, faxed, or mailed. Clarification is sometimes needed for certain sections when completing the AFHMP. Below are explanations in more detail for certain sections of the AFHMP that are often responded to incorrectly or not at all.

**3. Type of Marketing Plan**

More than likely you are completing an AFHMP for a multifamily housing development (i.e., an apartment complex), you would check *Project Plan*. If you are doing a scattered site development (i.e., single family units), you would check *Annual Plan*. For % minority residents by county please refer to Minnesota

Housing Website:

[http://www.mnhousing.gov/idc/groups/multifamily/documents/webcontent/mhfa\\_007961.pdf](http://www.mnhousing.gov/idc/groups/multifamily/documents/webcontent/mhfa_007961.pdf)

**4. Direction of Marketing Activity**

Indicate only the people “least likely to apply”, currently residing in the marketing area.

**5a. Marketing Program - Commercial Media**

If advertisements are used, remember to indicate the size of the ad(s) and how long the ad will run. If advertising through television or radio, indicate the length of the advertisement.

**5b. Marketing Plan - Brochures, Signs, and HUD’s Fair Housing Poster**

Minnesota Housing financed developments are to have a site identification sign that includes the Equal Opportunity Housing logo and/or statement along with the development’s name and rental information telephone number.

**5c. Community contacts**

**ALL** information requested is to be provided. Minnesota Housing provides a list of various community contacts on the web site (path below). This information can be used to assist in completing the plan. (Note: the Agency does occasionally update the actual contact information, however, validity is not guaranteed.) MN Housing recommends that actual contact information that is made (via letter, phone, flyer, etc.) and frequency of this contact is retained in a Fair Housing folder.

<http://www.mnhousing.gov/wcs/Satellite?c=Page&cid=1358905285667&pagename=External%2FPage%2FEXTStandardLayout>

**7a. Experience and Staff Instruction**

Management agents or owners are to list any marketing activity they have done regarding marketing to the groups identified in #4 as “least likely to apply” without special outreach efforts. The kinds of marketing might include:

- \* distributing brochures or flyers at grocery stores, housing fairs, community organizations, etc. advertising the availability of the housing,
- \* identifying by name and city location other developments owned or managed by the management agent or owner also indicating which of the populations reside at that development (e.g., XYZ Management Company has successfully marketed housing to African Americans and Asians at ABC Apartments, St. Cloud, MN; and has marketed housing to American Indians in Bemidji for Bemidji Townhomes).

If an owner or management agent has no experience marketing housing to the groups identified as “least likely to apply” in #4 than indicate none. **“None” is an acceptable response if that’s the case.**

**7b. Experience and Staff Instruction**

List all training staff who will receive and who provides the training to the staff on state, federal, and local fair housing laws as well as the AFHMP (e.g. XYZ Management Company staff attend annually fair housing training sponsored by HUD, or, staff attends the fair housing workshop offered at the annual conference sponsored by Minnesota Housing, Multi-Housing Association, et. al., etc.).

***Attach a copy of the instructions to staff regarding fair housing.***

**8. Additional Considerations**

Use this space to provide additional information, or helps to explain or clarify information given previously on the AFHMP (e.g., *"XYZ Management Co. has a current waiting list that is updated annually for 20 families for a 24 unit ABC Apartments, St. Cloud, so there is no immediate need to advertise. Enclosed is a copy of the waiting list."*)

**9. Anticipated or Actual Resident Demographics**

By head of household, indicate who presently occupies the development or to the best knowledge, who will occupy the development as a result of the marketing efforts made. The total number should not exceed the total number of units minus any units that are vacant at the time the AFHMP is being completed. This means if there are 30 units in the development, and all 30 units are occupied, the total number for African American/Black, American Indian/Alaskan Native, Asian, Hispanic/Latino, Native Hawaiian/Pacific Islander or White residents should total 30. Numbers for persons with disabilities (disabled), families with children, and persons on public assistance, will be a subset of the total number of the residents identified previously. This means they may be counted more than once. For example, you may have an Asian resident receiving public assistance that also has a disability.

# MINNESOTA HOUSING AFFIRMATIVE FAIR HOUSING MARKETING PLAN

## 1. INTRODUCTION

State and Federal Affirmative Fair Housing Marketing Regulations require that each applicant subject to these Regulations carry out an Affirmative Marketing Program to attract prospective buyers or tenants of all minority and non-minority groups to the housing that the applicant is providing. These groups include African American/Black, American Indian/Alaskan Native, Asian, Hispanic/Latino, Native Hawaiian/Pacific Islander or White in the Standard Metropolitan Statistical Areas (SMSA) or housing market area who may be subject to housing discrimination on the basis of race, color, creed, religion, sex, national origin, marital status, status with regard to public assistance, disability, sexual orientation, or familial status.

## 2. APPLICATION AND PROJECT IDENTIFICATION:

A. NAME OF APPLICANTS	B. MINNESOTA HOUSING DEVELOPMENT (D) #  NUMBER OF UNITS (Indicate family, elderly, etc.)
ADDRESS (Include City, State and ZIP Code)	PRICE OR RENTAL RANGE OF UNITS:  FROM \$      TO \$
TELEPHONE NUMBER	D. FOR MULTIFAMILY HOUSING ONLY: <input type="checkbox"/> ELDERLY <input type="checkbox"/> NON-ELDERLY
C. PROJECT NAME	E. APPROXIMATE STARTING DATES  ADVERTISING      OCCUPANCY
	F. NAME OF MANAGING/SALES AGENT (when applicable)
LOCATION / ADDRESS (Include City, State and ZIP Code)	ADDRESS (Include City, State and ZIP Code)
COUNTY	G. MINNESOTA HOUSING PROGRAM (s) USED TO FINANCE

## 3. TYPE OF AFFIRMATIVE MARKETING PLAN

☐ Project Plan      ☒ Annual Plan (for single family scattered site units)

NOTE: A separate Annual Plan must be developed for each area in which the housing is to be built.

☐ Minority Area      ☐ White (non-minority) Area      ☐ Mixed Area (with      % minority residents)  
(See # 3 Supplemental Instructions for %)

## 4. DIRECTION OF MARKETING ACTIVITY

Indicate below which group(s) in the housing market area are "least likely to apply" for the housing because of its location and other factors without special outreach efforts.

<input type="checkbox"/> Black/African American	<input type="checkbox"/> American Indian/Alaskan Native	<input type="checkbox"/> Asian
<input type="checkbox"/> Hispanic/Latino	<input type="checkbox"/> Native Hawaiian/Pacific Islander	<input type="checkbox"/> White <input type="checkbox"/> Other
<hr/>		
<input type="checkbox"/> Persons with Disabilities	<input type="checkbox"/> Families with Children	

\* Failure to complete each section will delay approval of the AFHMP.

**5. MARKETING PROGRAM****A. COMMERCIAL MEDIA**

Check the media to be used to advertise the availability of this housing.

☐ Electronic Media      ☐ Newspaper(s)/Publication(s)      ☐ Radio      ☐ TV      ☐ Billboard(s)      ☐ Other (Specify)

NAME OF NEWSPAPER, RADIO OR TV STATION, etc.	RACIAL/ETHNIC IDENTIFICATION OF READERS/AUDIENCE	SIZE/DURATION OF ADVERTISING

**B. BROCHURES, SIGNS AND HUD'S FAIR HOUSING POSTER:**

(1) Will brochures, leaflets, or handouts be used to advertise? ☐ Yes ☐ No. If yes, attach a copy or submit when available.

(2) For project site sign, indicate sign size \_\_\_\_ x \_\_\_\_; Logotype size \_\_\_\_ x \_\_\_\_.

(3) HUD's Fair Housing Poster must be conspicuously displayed wherever sales/rentals and showings take place. Fair Housing Posters will be displayed in the ☐ Sales/Rental Office(s); ☐ Real Estate Office(s); ☐ Model Unit(s); ☐ Other (Specify) \_\_\_\_

**C. COMMUNITY CONTACTS**

To further inform the group(s) "least likely to apply" about the availability of the housing, the applicant agrees to establish and maintain contact with the groups/organizations listed below that are located in the housing market area or SMSA. If more space is needed, attach an additional sheet. Notify Minnesota Housing of any changes in this list. Attach a copy of correspondence to be mailed to these groups/organizations. (Provide all requested information.)

NAME OF GROUP/ORGANIZATION	RACIAL/ETHNIC IDENTIFICATION	APPROXIMATE DATE OF CONTACT OR PROPOSED CONTACT	PERSON CONTACTED OR TO BE CONTACTED
ADDRESS AND TELEPHONE NUMBER	METHOD OF CONTACT	INDICATE SPECIFIC FUNCTION OF GROUP/ORGANIZATION	

**6. FUTURE MARKETING ACTIVITIES (Rental Units Only)**

Check the block(s) that best describe future marketing activities to fill vacancies as they occur after the project has been initially occupied.

- ☐ Newspapers/Publications
 ☐ Radio
 ☐ TV
 ☐ Brochures/Leaflets/Handouts
 ☐ Site Signs  
☐ Community Contacts
 ☐ Others (*Specify*)

**7. EXPERIENCE AND STAFF INSTRUCTIONS**

- A. Indicate any experience in marketing housing to the group(s) identified as "least likely to apply". (See page 1, number 4).
- B. Indicate training to be provided to staff on federal, state and local fair housing laws and regulations, as well as this Affirmative Fair Housing Marketing Plan. Attach a copy of the instructions to staff regarding fair housing.

**8. ADDITIONAL CONSIDERATIONS:****9. ANTICIPATED OR ACTUAL RESIDENT DEMOGRAPHICS**

Please list the number of persons (**by head of household**). Use real numbers not percentages that you anticipate will occupy or presently occupy the units as a result of your affirmative marketing efforts. The total number by Group(s) cannot exceed the total number of units occupied.

Black/African American

American Indian/Alaskan Native

Asian

Hispanic/Latino

Native Hawaiian/Pacific Islander

White

Other

Persons with Disabilities

Families with Children

Persons on Public Assistance

**10. SIGNATURES**

By signing this form, the applicant agrees, after appropriate consultation with Minnesota Housing, to change any part of the plan covering a project to assure continued compliance with affirmative fair housing marketing regulations.

SIGNATURE OF PERSON SUBMITTING PLAN

NAME (TYPE OR PRINT)

TITLE AND COMPANY

DATE

**MINNESOTA HOUSING USE ONLY**

APPROVAL BY

DISAPPROVAL BY

SIGNATURE

SIGNATURE

NAME (TYPE OR PRINT)

NAME (TYPE OR PRINT)

TITLE

TITLE

DATE

DATE





## VIII. Recommendations

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Appearing on the following pages are ten goals, each supported by a list of fair housing recommendations corresponding to fair housing issues raised in this report and paired with an implementation timeframe and responsible parties.

The members of the Fair Housing Implementation Council, who will primarily be the responsible entities for implementing the recommendations, are diverse in their character, politics, resources, demographics, and challenges. Accordingly, the recommendations here are generally drafted so as to allow various courses and mechanisms that arrive at the desired ends. In this way, individual FHIC jurisdictions have the latitude to implement the recommended strategies in the ways that are most feasible within their respective jurisdictions. While overly-prescriptive recommendations in this document would limit the effectiveness of some jurisdictions' implementation actions, specificity is important. Each FHIC entitlement jurisdiction will, in its Consolidated Plan and Annual Action Plan, describe in greater detail the specific steps and actions it plans to take toward the recommendations listed here. Their annual Consolidated Annual Performance Evaluation Reports (CAPERs) will document actual progress toward implantation of the recommendations.

A final note about the responsible parties listed on the following pages: Public Housing Authorities (PHAs) and Housing and Redevelopment Authorities (HRAs) are intended to mean those authorities that administer Housing Choice Vouchers and are controlled by a FHIC member. For example, the Minneapolis Public Housing Authority and Saint Paul Public Housing Authority are not party to this Addendum and are not intended to be bound by these recommendations. The Hennepin County HRA is an instrument of the County, but does not administer Housing Choice Vouchers; therefore, those recommendations that are the responsibility of HRAs are generally not applicable to Hennepin County HRA.

No.	Recommendation	Fair Housing Issue Addressed	Timeframe	Responsible Parties
<b>Goal #1: Improve Opportunities for Mobility within the Region</b>				
Renter households attempting to use a housing choice voucher or to access public housing may face barriers to moving within the region, particularly from urban to suburban locations, which can in turn limit access to opportunities desired by these households. The recommendations included in this section address policies related to voucher use, voucher holder mobility, and PHAs/HRA policies. They build on recent legislation (the passing of a Section 8 source of income protection in Minneapolis) and research (Family Housing Fund's "Enhancements and Best Practices Designed to Expand Resident Choice and Mobility in Minneapolis."				
1A 1	Work toward enactment of local source of income protection legislation that specifically covers voucher holders.	Access to Housing is Reduced for Some Groups	2019	Saint Paul
1B new	Develop a communication strategy to inform rental property managers and housing choice voucher holders of the recently-passed source of income protection ordinance.	Fair Housing Enforcement and Education is Needed	2017	Minneapolis, MPHA
1C 2	Collect and present local data to elected officials illustrating the need for source of income protection. Advocate for local source of income protection legislation throughout the region.	Access to Housing is Reduced for Some Groups	2018	Entitlements and Subrecipients
1D 8	Develop and implement an ongoing campaign to promote the acceptance of HCVs, especially in suburban communities. Require HCV acceptance for housing using public funds, and monitor for compliance.	Distribution of Affordable Housing	Ongoing, beginning 2018	Entitlements, Met Council
1E 9	Monitor findings related to the Family Housing Fund's research on pooling vouchers for use in high-opportunity areas as well as its voucher mobility research for MPHA and study applicability for other PHAs. Specifically: a) Evaluate recommendations in "Enhancements and Best Practices Designed to Expand Resident Choice and Mobility in Minneapolis" to determine MPHA's implementation approach for those that are most promising. b) Determine recommendations in "Enhancements and Best Practices Designed to Expand Resident Choice and Mobility in Minneapolis" that are relevant to other PHAs and HRAs and develop an implementation approach. c) Develop a demonstration program to pool HCVs across multiple PHA/HRAs and examine results relative to expanding mobility and choice for low-income families.	Multifaceted Values on Neighborhoods and Housing	Parts (a) and (b) - 2017, Part (c) - 2018	PHAs HRAs
1F 10	Monitor the success of Met Council's mobility program for strategies that can be adapted or duplicated elsewhere.	Multifaceted Values on Neighborhoods and Housing	2018-2021	PHAs HRAs
1G 34	Review and update tenant screening policies related to criminal background based on revised HUD guidance issued in 2016.	Regulations and Policies Impact Housing Development	2017	PHAs HRAs
1H 35	Review residency preferences for impact on mobility across the region. Amend as needed to better advance regional fair housing choice.	Regulations and Policies Impact Housing Development	2018	PHAs HRAs



<b>Goal #2: Reduce Resident Displacement</b> Low- and moderate-income residents displaced from their housing in a tight housing market with very low vacancy rates can face extreme challenges in locating affordable housing while the vacated units tend to become less affordable. These twin consequences – greater demand for affordable housing and a market that provides less of it – compound the effects of displacement and underscore the importance of countering it. Some of the strategies proposed here are designed to reduce pressure on individual residents to leave their residences; others are neighborhood-based strategies focused on preemptively securing affordable units in areas where displacement pressure is anticipated.				
2A 3	Research state law regarding local just cause eviction ordinances. If possible, work toward and advocate local adoption of just cause eviction ordinances.	Displacement Causes a Loss of Affordable Housing	2019	Entitlements
2B 5	Monitor state legislation regarding right of first refusal statutes and develop program to implement locally as appropriate. Consider implementation for manufactured/mobile home communities and multi-unit rental properties.	Displacement Causes a Loss of Affordable Housing	Ongoing	Entitlements Met Council (Partners: MHP, HOME Line)
2C 29	Research and create property tax abatement programs and market them to homeowners in areas of increasing displacement.	Displacement Causes a Loss of Affordable Housing	2019	Minneapolis and Saint Paul (Partners: HOME Line, MHP)
2D 31	Prioritize rehabilitation and preservation of existing affordable housing in areas where displacement is known to be occurring.	Distribution of Affordable Housing	2018	Entitlements
<b>Goal #3: Increase Access to Homeownership</b> Households of color have significantly lower homeownership rates than white households. In addition to inhibiting housing choice, diminished access to mortgage lending and homeownership opportunities also reduces these households' ability to build wealth. Research indicates a variety of factors that contribute to this gap, including lower mortgage loan application rates, higher mortgage loan application denial rates, less resources available for downpayments, steering towards subprime or otherwise inferior loan products, and higher foreclosure rates. This goal contains several strategies designed to address these factors, along with the development of a regional partnership to consider additional ways to expand homeownership opportunities.				
3A 4	Use distribution of government financial relationships to incentivize fair and affordable housing by financial institutions, using research such as U of M Responsible Banking study. Meet with lenders to inform them of jurisdictions' goals for furthering fair housing in homeownership. Invite lenders to coordinate business and charitable programs accordingly. Require that financial institutions report on home mortgage lending and other fair lending activities.	Access to Housing is Reduced for Some Groups	2018	Entitlements
3B 36	Develop partnerships with credit counseling agencies to reach communities of color and build a pipeline of potential homebuyers.	Access to Housing is Reduced for Some Groups	2018	Entitlements
3C new	Establish a multi-jurisdiction partnership to address homeownership disparities that includes public and private sector partners. Consider topics such as expanded first time homebuyer programs, expansion of homeownership options through land trusts and cooperatives, increased	Access to Housing is Reduced for Some Groups	2018	Met Council, Entitlements, Subrecipients, PHA/HRAs, Private Sector Partners



	efforts to help low-income households build savings, and advocacy for legislative improvements in Minnesota Contract for Deed law.				
3D new	<p>Work with public and non-profit agencies to expand information and services related to fair lending and foreclosure prevention, such as:</p> <ul style="list-style-type: none"> <li>Affirmative marketing for quality lending products, including financing options for Muslim homebuyers, and information on identifying subprime mortgage products</li> <li>Increased fair lending enforcement</li> <li>Increased foreclosure prevention and defense advocacy services.</li> </ul> <p>Ensure that all outreach efforts are accessible to non-English speaking residents, including oral presentations of information.</p> <p>Conduct code enforcement to make sure that lender-owned, post-foreclosure properties have effective repair, maintenance, and security services, especially in areas of concentrated poverty where a majority of residents are people of color.</p>	Access to Housing is Reduced for Some Groups	2017	Entitlements (Partners: Housing Justice Center, MMLA, SMRLS)	
3E new		Access to Housing is Reduced for Some Groups	Ongoing, beginning in 2017	Entitlements	
<b>Goal #4: Expand Funding for Affordable Housing</b> Presently, the Low Income Housing Tax Credit program provides funding for the majority of new affordable housing constructed or rehabilitated in the region. However, production levels fall short of need, and, in many cases, do not provide deep enough subsidy levels to support very low-income households. The following recommendations address the need to cultivate new funding sources for affordable housing production and preservation, both at the regional and local levels, including resources to address the needs of households with incomes below 30% AMI.					
4A 6	<p>Develop an overarching strategy to increase funding for affordable housing that includes:</p> <p>a) Identifying more resources for affordable housing. These may include regional approaches to expanding funds for affordable housing and local approaches by individual jurisdictions (tax increment financing, tax abatement, special tax levy authority, general tax levy authority, general funds, and/or other local sources).</p> <p>b) Working with a marketing firm and local stakeholders, including organizations operating in communities of color, to develop a campaign to raise awareness among the public about housing affordability and its connection to education, jobs, and other infrastructure. Campaign should build political will, counter NIMBYism, and include an appeal to philanthropies for funding.</p>	Distribution of Affordable Housing	Ongoing, beginning 2017	Entitlements	
4B 7	Use locally-controlled resources to preserve naturally occurring affordable housing. Work with GMHF to support NOAH Fund, publish success stories, market to susceptible property owners, increase capitalization and funding sources.	Distribution of Affordable Housing	Ongoing	Entitlements (Partner: Greater Minnesota Housing Fund)	



<b>Goal #5: Improve Fair and Affordable Housing Planning</b> A serious and sustained effort to expand fair and affordable housing will require ongoing planning, research, and capacity-building. This set of recommendations focuses on developing capacity at the local level through technical assistance and plan review, along with training on fair housing implications of local policy and investment decisions. Also included are recommendations to advance analyses around fair housing issues such as zoning and gentrification. Finally, enhancing the FHIC by establishing a fair housing advisory committee will allow for ongoing feedback and guidance during implementation of fair housing activities and future fair housing planning efforts.					
5A 11	Met Council should develop the capacity to resource local government staff for fair housing planning and policy. Local governments should support and assist Met Council's efforts to provide technical assistance.	Segregation & Disparate Access to Opportunity	2018	Met Council	
5B 12	Continue to review and provide feedback on comprehensive plans to ensure they adequately describe a plan to meet affordable housing need.	Distribution of Affordable Housing	2017	Met Council	
5C 13	Integrate affordable housing development with CDBG subrecipient funding processes to prioritize community and economic development activities in areas that have shown a commitment to expanding affordable housing.	Segregation & Disparate Access to Opportunity	2019	Counties	
5D 21	Work with local research partner to analyze zoning codes in areas not covered by this study (i.e., cities within the region that are not entitlements or subrecipients) for fair housing issues.	Regulations and Policies Impact Housing Development	2020	Met Council (Partner: CURA, IMO, or other organization with zoning research capacity)	
5E 22	Monitor continued research into gentrification and loss of affordable housing to identify areas where it may be occurring.	Displacement Causes a Loss of Affordable Housing	Ongoing, beginning 2017	Entitlements (Partners: CURA, IMO, MHP)	
5F 23	Review where investments in creation, preservation and/or rehabilitation of affordable housing using LIHTCs are occurring in the region. Keep HousingLink LIHTC database current and study trends over time in the development of tax credit projects.	Distribution of Affordable Housing	Ongoing, beginning 2017	MHFA, Suballocators (Partner: HousingLink)	
5G 39	Develop and deliver a fair housing education and training program for elected officials and municipal staff focused on geospatial concepts such as disparate impact and the impact of public infrastructure investments on fair housing choice.	Fair Housing Enforcement and Education is Needed	2019	FHIC Municipalities and Counties (Partners: Housing Justice Center, MMLA, SMRLS)	
5H new	Establish a standing fair housing advisory committee to provide input and guidance to the FHIC regarding fair housing planning and implementation. Strive to increase diversity on the FHIC to be more representative of the regional population.	Multifaceted Values on Neighborhoods and Housing	2017	FHIC	



### Goal #6: Expand Locations of Affordable Housing

When affordable housing is limited to some communities and lacking in others, the effect is decreased housing choice for residents of the region. Municipal zoning codes and other regulatory tools can be modified or employed to reduce restrictions on the development of affordable housing in areas where it may presently be prohibitive. Such actions can open up new housing opportunities in communities of choice. This goal contains several strategies related to zoning changes, but also includes actions recommended by MN Challenge that can be taken in individual jurisdictions to lower the cost of affordable housing development, and other opportunities to expand affordable housing opportunities in communities where it is needed.

		Regulations and Policies Impact Housing Development	2018	Crystal, Minneapolis
6A 14	Adopt zoning code amendments to either (1) have the definition of "family" more closely correlate to neutral maximum occupancy restrictions found in safety and building codes; (2) increase the number of unrelated persons who may reside together to better allow for nontraditional family types; or (3) create an administrative process that allows for a case-by-case approach to determining whether a group that does not meet the code's definition of family or housekeeping unit is nonetheless a functionally equivalent family.	Regulations and Policies Impact Housing Development	2018	Apple Valley, Blaine, Burnsville, Eagan, Eden Prairie, Minnetonka
6B 15	Amend zoning maps as appropriate to rezone large-lot single-family zones to higher density/ lower minimum lot area standards and allow for infill development or conversion of large single-family dwellings to two-family and triplex units to allow more density on the same footprint or minimum lot size; where environmental protections effectively prohibit denser development patterns, alternatively consider focused redevelopment strategies in areas served by existing water and sewer. Consider reducing administrative barriers to PUD and cluster development approvals which support affordable housing.	Regulations and Policies Impact Housing Development	2018	Lakeville
6C 16	Amend zoning codes to reflect more flexible and modern lot design standards such as increasing maximum height allowances, increasing minimum density or floor area ratios, increasing maximum floor area ratios (FAR), decreasing minimum parcel sizes, and decreasing minimum livable floor areas of individual dwelling units.	Regulations and Policies Impact Housing Development	2018	All local governments with zoning authority
6D 17	Consider development incentives such as density bonuses and expedited permitting processes or fee waivers for voluntary inclusion of affordable units or mandatory set asides in cases where local government funding or approvals are provided, should be adopted across all jurisdictions to encourage or require mixed-income, affordable units.	Regulations and Policies Impact Housing Development	2018	Lakeville
6E 18	Review and update zoning codes as necessary for consistency with the state Planning Act regarding manufactured and modular homes. Review conditional permit use criteria and inclusionary zoning provisions to ensure they support and encourage this type of alternative affordable housing.	Regulations and Policies Impact Housing Development	2018	Brooklyn Park
6F 19a	Consider allowing reductions in off-street parking requirements where there is a showing that shared parking, bike parking, or access to public transportation reduces the actual need or demand for off-street vehicle parking; consider adopting maximum off-street parking restrictions.	Regulations and Policies Impact Housing Development	2018	Brooklyn Park



6G 19b	Consider relaxing or offering measures to mitigate the cost of some requirements related to building materials: height, trees, windows, parking, basement space, and outdoor play areas, especially when applied to affordable housing developments.	Regulations and Policies Impact Housing Development	2018	Minneapolis
6H 20	Consider adoption of an inclusionary zoning ordinance requiring set-asides of affordable housing units especially for developments requiring city funding, site location assistance, or planning approvals.	Regulations and Policies Impact Housing Development	2018	Apple Valley, Blaine, Brooklyn Center, Brooklyn Park, Burnsville, Coon Rapids, Crystal, Eagan, Eden Prairie, Hopkins, Minnetonka, Plymouth, Richfield, Saint Paul
6I 24	Analyze the MN Challenge recommendations related to reducing the cost of affordable housing for feasibility at the local level; implement as appropriate. The 11 recommendations from the MN Challenge report are: a) Support appropriate density b) Contribute local financial resources c) Identify and acquire sites d) Reduce parking requirements e) Waive or reduce fees f) Streamline administrative processes g) Revise material, site, and design requirements h) Consider manufactured and modular housing i) Be open to all affordable housing developments j) Adopt inclusionary housing and/or mixed income policies k) Address community opposition	Distribution of Affordable Housing	2018	Entitlements and Subrecipients
6J 30	Monitor proposals by HAVEN (Housing Advocates for Vitality and Equality Now), the Qualified Allocation Plans of MHFA and local suballocators, and state legislative changes related to 4% tax credits and Private Activity Bonds. Advocate for and implement policies that direct affordable projects toward strategic ends (i.e. preservation focus or location of new units in areas of opportunity).	Distribution of Affordable Housing	2018	MHFA, Suballocators
6K 33	Ranked list of municipalities in QAP should be re-examined for impact on perpetuating concentrations of affordable housing; consider whether other measures of affordable housing need may be more effective.	Regulations and Policies Impact Housing Development	2017	Washington County

<b>Goal #7: Institute Effective and Meaningful Community Engagement</b> Public planning and investment decisions are too often made without the engagement and active participation of the affected communities, particularly when those are communities of color. Jurisdictions across the region should allocate resources to fund proper engagement with their communities and ensure that effective, culturally-appropriate mechanisms are in place to meaningfully engage communities around housing and related issues. Planning processes should be reconstructed to require and accommodate engagement that is impactful and not merely a "check the box" exercise.				
7A 25	Explore options for amplifying community voices in local planning decisions. Plan to include non-English speakers, and those of oral traditions.	Concentrated Poverty Requires Place-Based Investment	2018	Minneapolis and Saint Paul
7B 28	Maintain data on the racial and ethnic composition of local elected and appointed boards and commissions; encourage representation reflective of the communities served.	Concentrated Poverty Requires Place-Based Investment	2019	Met Council (Partner: Nexus Community Partners' Boards and Commissions Leadership Institute)
7C 41	Review LEP plans and update as needed to better serve the needs of all cultures and communication needs.	Fair Housing Enforcement and Education is Needed	2018	Entitlements
7D 42	Commit city staff resources to efforts to enhance engagement with communities of color regarding available housing programs and needs. Responsibility for community outreach should be consolidated with a specific staff person who works intentionally to open and maintain lines of communication within communities of color.	Fair Housing Enforcement and Education is Needed	2020	Minneapolis and Saint Paul
7E new	Develop tenant training programs, one targeted to high school students, and one targeted to specific immigrant communities, and work with local school districts and existing community organizations on a program and schedule for delivery of the training.	Fair Housing Enforcement and Education is Needed	2018	FHIC (Partners: HOME Line, SMRLS, MMLA)
<b>Goal #8: Invest in Place-Based Community Improvements</b> Focusing investment in defined communities most affected by poverty is needed in order to enhance these areas and make them communities of choice and also to build the human capital of the community's residents. Place-based investment is more impactful than a strategy of smaller investments made in a number of different communities simultaneously and is key to creating real change in a place and its people. The strategies described here include several different platforms from which a place-based investment model can be employed.				
8A 26	Consolidated Plans should contain place-based strategies, focusing available funding on improving the human capital and physical resources in specific, defined high-poverty areas.	Concentrated Poverty Requires Place-Based Investment	2018	Entitlements
8B 27	Review capital improvement planning models to ensure process is informed by data on concentrated poverty and areas of low opportunity.	Concentrated Poverty Requires Place-Based Investment	2019	Entitlements
8C new	When implementing place-based development or revitalization strategies, jurisdictions should consider impacts on the segregation or integration of affected schools and maintain communication with school district representatives.	Concentrated Poverty Requires Place-Based Investment	Ongoing	Entitlements



<b>Goal #9: Support Multicultural Housing Needs</b> The ethnic and cultural diversity in the Twin Cities region requires that jurisdictions work closely with existing ethnic and cultural organizations to reach and interact with these populations in appropriate ways. Not only do methods of application for housing units need to be adapted, but channels for disseminating information about housing programs and about one's rights under the Fair Housing Act need to be opened through organizations that are trusted by the community. Cultural housing needs, such as large units to house multigenerational families, should be considered.				
9A 32	Routinely review PHA subsidy standards, LIHTC QAPs, and other housing program policies and occupancy standards to ensure accommodation of units for large, multigenerational families.	Multifaceted Values on Neighborhoods and Housing	Ongoing, annually. Beginning 2018	Suballocators PHAs HRAs Entitlements
9B 43	Ensure applications for housing program assistance are available online as well as in hard copy and that both options are advertised; work with cultural organizations to implement effectively.	Access to Housing is Reduced for Some Groups	Ongoing, beginning 2017	Entitlements, Subrecipients, PHAs, HRAs
9C 44	Explore partnerships to disseminate fair housing information and resources to undocumented residents through existing organizations that have earned the trust of the communities they serve.	Fair Housing Enforcement and Education is Needed	2018	FHIC
<b>Goal #10: Support Residents' Fair Housing Rights</b> Work to prevent housing discrimination remains an important consideration for the jurisdictions in the Twin Cities region. The strategies here involve support for existing organizations that are providing fair housing education and enforcement, a recommendation for a region-wide program of fair housing testing to determine areas of particular concern for compliance with the Fair Housing Act, and a review of local affirmative marketing plans for sufficiency in protecting protected classes from discrimination in the rental of subsidized housing units. Additionally, residents engaged in this analysis described code enforcement actions that had significant unintended consequences such as displacement and homelessness. These issues are addressed by the strategies in this section as well.				
10A 37	Continue dialogue between code enforcement, child welfare agencies, and housing rehabilitation programs to discuss linkages that would provide assistance to tenants living in substandard conditions.	Displacement Causes a Loss of Affordable Housing	2018	Entitlements
10B 38	Ensure local code enforcement departments are trained to minimize substandard housing conditions without creating vulnerability to tenants. Ensure officers are trained to maintain communication and status updates with complainants as well as property owners.	Fair Housing Enforcement and Education is Needed	2018	Entitlement Cities
10C 40	Monitor and provide financial support for the efforts of existing community-based organizations in offering fair housing education in culturally-appropriate ways to non-English speaking communities; education materials should include general information about landlord and tenant responsibilities as well. A "what to do if you're facing eviction" insert could be helpful.	Fair Housing Enforcement and Education is Needed	2018	Entitlements (Partners: MMLA, SMRLS, HOME Line)
10D 45	Conduct region-wide fair housing testing specifically in the areas of steering and discrimination on the basis of familial status.	Fair Housing Enforcement and Education is Needed	2019	FHIC (Partners: SMRLS, MMLA)
10E new	Review affirmative marketing plans and enact as appropriate new policies or provisions that ensure non-discrimination in the lease of publicly-subsidized rental housing.	Fair Housing Enforcement and Education is Needed	2019	Entitlements