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# City of Saint Paul
# HOME-ARP Allocation Plan

Substantial Amendment ~~II~~IV

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# Introduction

In 2021, the American Rescue Plan Act (ARPA) provided $5 billion in funding to be administered by the U.S. Department of Housing and Urban Development (HUD) through the HOME Investment Partnerships (HOME) program to address the critical need for homelessness assistance and supportive services. The City of Saint Paul, as HOME Program Participating Jurisdiction, was awarded $6,789,929 in HOME-ARP funds to benefit our community's qualifying populations. HUD issued guidance for the utilization of the HOME-ARP funds through CPD-Notice-21-10 on September 13, 2021. HOME-ARP funds are a one-time allocation and must be spent by September 30, 2030. On April 30, 2025, The City was allocated an additional $10,132 for a revised total HOME-ARP Award of $6,800,061, resulting in a minor amendment. This fourth amendment modifies the focus of funding to affordable housing development activities.

Activities eligible under the program include:

1. planning and administration of the HOME-ARP program,
2. affordable rental housing development,
3. tenant-based rental assistance (TBRA),
4. supportive services,
5. acquisition and development of non-congregate shelter, and
6. nonprofit capacity building and operating assistance.

HOME-ARP funds must be used to primarily benefit individuals or families in the following qualifying populations:

1. Homeless, as defined in 24 CFR 91.5
2. At risk of homelessness, as defined in 24 CFR 91.5
3. Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking (as defined by HUD in 24 CFR 5.2003) or human trafficking (as outlined in the Trafficking Victims Protection Act of 2000 as amended [22 USC 7102]); and
4. Other populations, where providing supportive services or assistance under section 212(a) of the National Affordable Housing Act 42 USC 12472(a) would prevent a family's homelessness or serve those with the greatest risk of housing instability.

As described throughout the plan, there are needs for qualifying populations in each of the eligible activities, yet activities adding new shelter beds or housing units to the system were identified as more impactful. This plan does not include activities for affordable rental housing development because the City has a substantial program underway for deeply affordable rental using other American Rescue Plan Resources. HOME-ARP is unique in offering non-congregate shelter as an eligible activity.

~~The City of Saint Paul will focus its funding on acquiring and developing noncongregate shelter to benefit the qualifying populations in our community. In addition, the City will focus resources toward supportive services, and for nonprofit capacity building and operating assistance to foster successful HOME-ARP program delivery.~~

HOME-ARP funds will be incorporated as a substantial amendment to the City's 2021 Annual Action Plan, and will follow HUD guidance for public participation specific to the HOME-ARP program.

## Consultation

HUD requires Participating Jurisdictions - such as the City of Saint Paul - receiving an allocation of HOME-ARP to consult with stakeholder organizations to determine the needs and gaps related to these funding priorities and eligible activities.

Prior to the development of the HOME-ARP allocation plan, the City of Saint Paul worked closely with Ramsey County, the Heading Home Ramsey Continuum of Care (CoC), housing authorities, and providers to coordinate efforts that serve the qualifying populations addressed in the HOME-ARP guidance. The consultation process began in 2021 as part of larger engagement related to ARPA resources, including HOME-ARP, and continued most recently with targeted consultations to provide updated priorities and data in the current environment.

The consultation process can be summarized in two phases of engagement:

1) Initial ARPA engagement during the fall of 2021 focused on a lack of deeply affordable housing units in the City of Saint Paul and Ramsey County. This engagement covered HOME-ARP and as part of broader ARPA resources received by Saint Paul and Ramsey County. The City and County dedicated a combined $75 million of ARPA funds beyond the HOME-ARP allocation toward expanding the supply of 30% AMI and Permanent Supportive Housing. Consultations as part of this phase of engagement included nine targeted interviews with service providers with a specific focus on reaching providers who serve African American, American Indian, immigrant residents and youth. In addition to targeted interviews, staff attended seven large group meetings where housing providers, service providers, and staff from other public agencies already meet, including the Heading Home Ramsey CoC Steering Committee, Unsheltered Provider meeting and several Ramsey County provider and team meetings. An online survey was also used during this phase of engagement and obtained 34 responses from key stakeholders.

2) The second phase of engagement was conducted during the fall of 2022 to obtain more up to date trends and data, and follow up with key stakeholders with a focus on the utilization of the HOME-ARP resource. During this phase of engagement, staff met with the Heading Home CoC Steering Committee, The Saint Paul Homeless Assistance Response Team, and held five additional targeted consultations with additional stakeholders. A follow up online survey was conducted and obtained an additional 10 responses.

## Consultations

| Agency/Org Consulted | Type of Agency/Org | Method of Consultation | Feedback |
|---|---|---|---|
| **Heading Home Ramsey** | Continuum of Care (CoC) | Group meetings 9/2021, 11/2022, and 12/2022 | Need for additional, sustainable resources to expand the system. There is a need for housing options for all, ongoing funding for supportive services and unsheltered outreach. |
| **Saint Paul Homeless Action Response Team** | Public Agency/ Homeless Service Provider Coalition | Group meeting 11/2022 | Consider sustainable long term resources. Non congregate shelter option if ongoing operating support leveraged |
| **Ramsey County – Community and Economic Development** | Public Agency/Service Provider and HOME-ARP Grantee | Interview 10/2022 | Coordination of activities, to extent feasible, would leverage the funds. Ramsey County's HOME-ARP allocation plan includes development of affordable rental housing and supportive services |
| **Ramsey County – Veterans Services** | Public Agency/Veterans | Group discussion 9/2021 | Affordable housing needed across all AMI levels for veterans. Some with mental health supports. |
| **Minnesota Housing Finance Agency** | Public Agency/ Housing Funder and HOME-ARP Grantee | Interview 11/2022 | Coordination of activities, if state resources were used in Saint Paul, should be completed. The State's plan is not yet developed. |
| **Women's Advocates** | Domestic Violence Service Provider | Interview 12/2022 | There is a need for transitional shelter type housing (non-congregate shelter may be of value) and permanent housing. Resources should be coordinated with Office of Justice Programming for this population. |
| **Saint Paul Public Housing Agency** | PHA | Interview 12/2022 | Some funding could be valuable as capital incentives for developing deeply affordable rental housing. Housing search assistance also a high need. |
| **Metro HRA** | PHA | Group discussion 9/2021 | Invest in housing units that accept vouchers. Provide supportive services that help reduce housing instability and prevent eviction. |
| **Fair Housing Implementation Council** | Civil Rights/Fair Housing | Staff interviews 9/2021 | Provided feedback on fair housing within the HOME-ARP program and how preferences could be set. |

| | | | |
|---|---|---|---|
| **The Arc of MN** | Service Provider for Persons with Disabilities | Group meeting 9/2021<br>Interview 12/2022 | There is a gap in services resources that can provide for activities like security deposits. Persons with disabilities may need more 1:1 assistance, including to navigate the coordinated entry process. |
| **Catholic Charities** | Homeless Service Provider | Interview 9/2021<br>Interview 12/2022 | Increase in low barrier affordable housing, greater shelter investments, and a priority around mental health services. |
| **Ain Dah Yung Center** | Homeless Service Provider | Interview 9/2021 | Discussed need for flexible funding for permanent supportive housing and culturally specific services. |
| **Avivo** | Homeless Service Provider | Interview 9/2021 | Low barrier options for unhoused residents and greater funding for supportive services to transition people to independence. |
| **Face to Face** | Youth Services Provider | Interview 9/2021 | Make sure homeless youth are not forgotten as investments are made. Flexible funding for youth programming. |
| **Model Cities** | Housing Services Provider | Interview 9/2021 | Ongoing funding for supportive services and deeply affordable housing units. |
| **Metro Transit Homeless Action Team** | Homeless/Law Enforcement Agency | Interview 9/2021 | Mental Health services and housing specifically for those experiencing mental health crises. |
| **Ramsey County Veterans Services** | Veterans Services | Group Meeting 9/2021 | Affordable housing needed for all AMI levels for veterans. Some with strong mental health supports. |
| **Ujaama Place** | Homeless Service Provider | Interview 9/2021 | Low barrier options for those leaving correctional system. |
| **Unsheltered Provider Workgroup** | Housing/Homeless Service Providers | Group meeting 9/2021 | All new units need to be available for those that are experiencing unsheltered homelessness and provide more mental health supports |

## Results of Consultations

Both phases of engagement pointed to the need for deeply affordable housing options and more resources to support preventing and ending homelessness in our community. There are increasing levels of homelessness in Saint Paul (and Ramsey County CoC region more broadly) and BIPOC households, older individuals, and larger families are most acutely impacted by a shortage of housing options. We heard that deeply affordable housing

without supportive services and permanent supportive housing are both needed in our community to meet the needs of all qualifying populations.

We heard that for some individuals experiencing homelessness, community residences and other forms of congregate settings are in need. However, there is concern about lack of privacy in congregate settings, and non-congregate settings with private bathrooms and other shared common space would be best for individuals with significant medical barriers, especially for elders, and for survivors of domestic violence. Yet, there is also concern about ongoing operating support when considering the one-time funding of HOME-ARP. To consider a project with non-congregate shelter, a coordinated effort to obtain operational funding is necessary

Throughout our consultations, we heard that while all eligible activities under HOME-ARP are needed, and even difficult to prioritize, activities that can provide permanent resources are needed to support long term impacts to benefit the housing and homeless systems.

# Public Participation

The City of Saint Paul published a draft plan with a comment period and held a public hearing in order to provide the public with an opportunity to comment on its proposed HOME-ARP allocation plan.

## Public Participation Process

On January 23, 2023, the City published notice of the upcoming availability of the draft HOME-ARP plan in the Saint Paul Pioneer Press, as paper of record. The City published the draft plan on its website at https://www.stpaul.gov/departments/planning-and-economic-development/consolidated-plan, and printed copies were available on request. The plan was available for comment from January 24, 2023 through February 8, 2023. A hybrid (remote via Teams and in person) public hearing took place on February 8, 2023, at 3 PM.

On April 20, 2023, the City published an updated notice of the availability of the HOME-ARP Plan draft in the Saint Paul Pioneer Press. The updated plan was available for a fifteen day public comment period from April 20 through May 5, 2023 at the website above. A hybrid public hearing scheduled for May 3, 2023, at 3 PM.

Translation services were offered in advance of the public hearing and for the plan on request, as noted in meeting notifications and public notice.

The first substantial amendment had a fifteen-day public comment period open from April 23 through May 8, 2024. The City published the substantial amendment in its website and published a notice of availability in the Saint Paul Pioneer Press.

A second substantial amendment had a fifteen-day public comment period open from October 28 through November 12.

## Efforts to Broaden Public Participation

In addition to distributing materials through its traditional email list serve, the City also distributed the draft plan to a list of community stakeholders developed during the consultation process and through social media.

## Comments and Recommendations Received

The City of Saint Paul did not receive any comments during any of the comment periods to date

## Comments or Recommendations Not Accepted

The City of Saint Paul did not receive any comments.

# Needs Assessment and Gaps Analysis

The following describes the size and composition, existing resources, and unmet needs of each of the four qualifying populations in the HOME-ARP program and the priority needs for qualifying populations.

To determine the level of need and gaps in the shelter and housing inventory, the City of Saint Paul used a variety of data sources, including the 2022 Housing Inventory Count (HIC), the 2022 Point in Time (PIT) count, American Community Survey Data, Comprehensive Housing Assessment Strategy data, and local information collected in community consultation meetings.

## 1. Homeless Population

For the purposes of the HOME-ARP program, HUD defines "homeless" as defined in 24 CFR 91.5 or as in section 103(a) of the McKinney-Vento Homeless Assistance Act, as amended (42 U.S.C. 11302(a)) ("McKinney-Vento"), 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, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
>
> (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

(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 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;

(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, 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 Service Act (42 U.S.C. 254b(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.

**Size and Composition**

The City of Saint Paul is part of the Ramsey County Continuum of Care (CoC), Heading Home Ramsey, and the following data about the homeless population reflect data for the entire CoC.

As of the Point in Time Count for January 26, 2022, of 1,713 persons experiencing homelessness, there were 1,056 residing in emergency shelters, 300 who were unsheltered, and 357 in transitional housing in the CoC region. Table 1 categorizes by population type (in a family household and in a household without children), combining emergency shelters and transitional housing into one category of "sheltered".

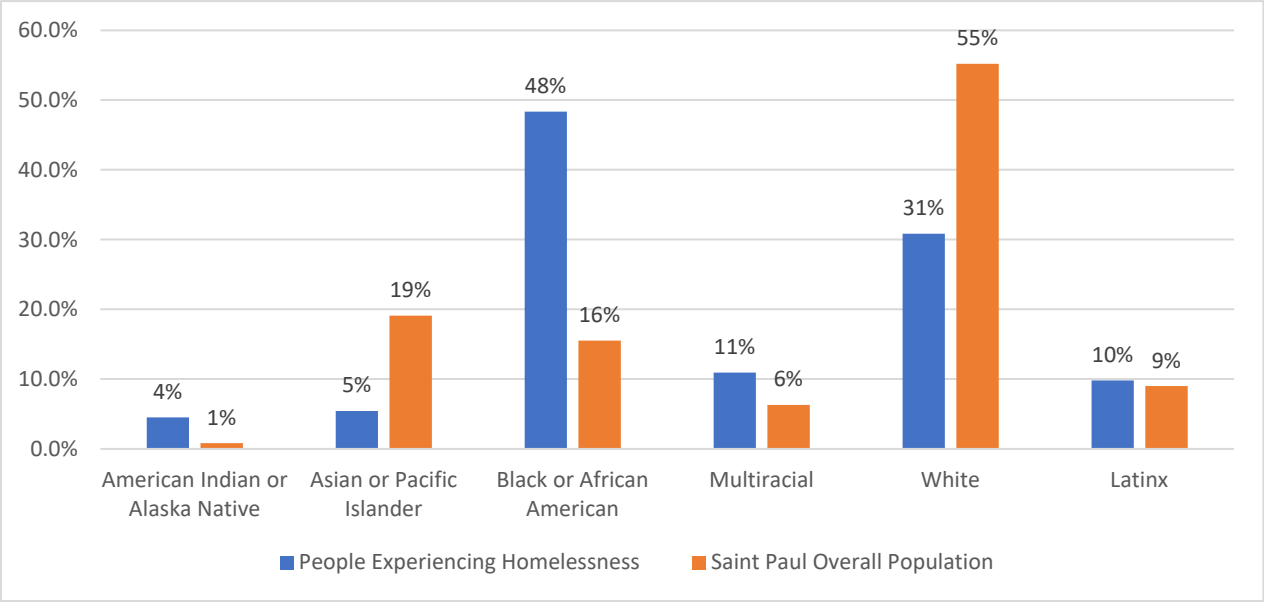
Table 1: Homeless Point in Time Count

| | **Homeless Population** | | **Subpopulations** | | |
|---|---|---|---|---|---|
| | In Family Household | In Household (w/out child) | Veterans | Unaccompanied Youth | DV Survivors |
| **Sheltered** | 497 | 916 | 64 | 17 | 210 |
| **Unsheltered** | 35 | 265 | | 1 | |
| **Total Combined** | 1713 | | | | |

Source: 2022 Ramsey County Point in Time Count (PIT)

As shown in the Figure 1 below, Black, Indigenous and Persons of Color (BIPOC) are disproportionately impacted by homelessness. People who are Black or African American make up 48% of the population experiencing homelessness, while they represent 16% of the overall city of Saint Paul population. People who are American Indian or Alaka native have a similar disparity, with 4% of population experiencing homelessness and less than 1% of the overall city population.

Figure 1 - Race and Ethnicity of Population




Source: 2022 Ramsey County Point in Time Count and American Community Survey 2016-2020.

More currently, Ramsey County's weekly situation report for the week ending December 18, 2022, there were an average of 567 persons in first come first served emergency shelters, 183 in family households. There were an additional 125 persons in program specific shelters, making emergency shelter usage averaging 692 persons per night. Note that the PIT data shown above includes transitional housing in additional to emergency shelters. Through our consultations, the City of Saint Paul learned of trends in homelessness that aren't reflected in the PIT data, including an increasing prevalence of older adults experiencing homelessness and larger families or couples and non-traditional families who are often split up in congregate shelter situations. Currently, of 100 people who are unsheltered homeless in the City of Saint Paul, there are thirty couples (sixty individuals) who are not eligible to stay in a congregate shelter together[1]. More broadly, the Wilder Foundation conducts a detailed study of homelessness every three years and contains more specific population data than the annual PIT. In the most recent published report[2], the study noted that older adults (aged 55 and older) are the fastest growing segment of the homeless population, even though they are the age group least likely to experience homelessness. The study also noted that the majority of homeless older adults have complex health conditions, with 90% reporting that a disability limited their ability to work or complete activities of daily living. Those with such health conditions need more assistance and access to private bathrooms to be successful in stabilizing their housing situation.

[1] Saint Paul Homeless Assistance Response Team, December 2022.
[2] Minnesota Homeless Study, 2018, Wilder Research. https://www.wilder.org/mnhomeless

**Existing Resources**

According to the Housing Inventory Count for 2022 and as shown in Table 2 below, there are over 1,300 beds in Emergency Shelters in the Ramsey County CoC region. Some of the largest shelters located in the City of Saint Paul include Catholic Charities' Higher Ground Shelter (376 beds among various programs), the Union Gospel Mission's Bethel Hotel (163 beds), and Model Cities' Safe Space Shelter (64 beds). Many Emergency Shelters offer transitional housing, and there are nearly 600 total transitional housing beds across the CoC region.

During the COVID-19 pandemic, Ramsey County and partners leveraged funding to provide emergency shelter, temporary housing in hotels and respite care facilities for those experiencing homelessness during the pandemic. Contracts with Bethesda Hospital provided specialized temporary shelter for women, elders and couples. The shelter activities initially funded through the CARES Act and other subsequent COVID funding require a long term strategy to resume operations in existing or new locations.

The CoC region has nearly 4,000 beds in Permanent Supportive Housing or other permanent housing through specialized vouchers. Some of the largest providers of permanent housing in these categories include Catholic Charities, Hearth Connection, Project for Pride in Living, RADIAS Health, and the Saint Paul Public Housing Agency.

Table 2: Homeless Housing Inventory Chart

| | **Total Inventory** | | **Subpopulation Inventory** | | |
|---|---|---|---|---|---|
| **Housing Type** | Family | Adults Only | Vets | Unaccompanied Youth | DV |
| Emergency Shelter | 329 | 984 | NA | 11 | 196 |
| Transitional Housing | 393 | 196 | NA | 8 | 51 |
| Permanent Supportive Housing | 1154 | 1826 | NA | - | 55 |
| Other Permanent Housing | 595 | 425 | NA | - | - |
| Rapid Rehousing | 407 | 80 | NA | - | - |

Source: 2022 Continuum of Care Housing Inventory Count (HIC)

**Gaps and Unmet Needs**

There are not enough shelter beds to meet the needs in the community by county. In the 2022 PIT there were nearly 1,850 people experiencing homelessness in emergency shelters or unsheltered, exceeding the number of total beds available in emergency shelters. More recently, the City of Saint Paul has experienced an increase in unsheltered homelessness, a worrying trend that has become more highly visible since 2019 and throughout the COVID-19 pandemic.

Specific gaps in the shelter system are more than just the number of beds, it is also the configuration of beds and housing options available. Discussions with the Saint Paul HART team and the Ramsey County CoC both noted a lack of shelter capacity for families, non-traditional families (especially couples), and elder singles in noncongregate shelter settings. Safe and private spaces are valuable in responding to COVID-19 pandemic from a public health perspective and will benefit those needing private shelter spaces for a variety of health and family circumstances.

## 2. At-Risk of Homelessness

For the purposes of the HOME-ARP program, HUD defines those at risk of homelessness as individuals and families who have an income at or below 30% of the area median income (AMI), do not have sufficient resources or support networks to prevent them from being homeless, and are experiencing housing instability. Housing instability under HUD's definition includes those who have moved two or more times during the last 60 days due to economic reasons, living in another person's home due to economic hardship, or exiting a publicly funded institution or system of care. HUD's at-risk definition also includes families and youth that qualify as homeless under the standard used by the Department of Education; those households with children that are doubled up.

**Size and Composition**

There is no data that provides a complete picture of the number of households at-risk as defined by HUD. However, the HUD Comprehensive Housing Affordability Strategy (CHAS) data offers a part of the picture.

For the City of Saint Paul, the CHAS data show that there are over 25,000 households with incomes less than or equal to 30% of Area Median Income (extremely low income), 21,000 of them renter households. Among these extremely low-income renter households, 65 percent (16,280) have one or more of four severe housing problems reported in the CHAS data. Severe housing problems include incomplete kitchen facilities, incomplete plumbing facilities, more than 1.5 persons per room, or a rent cost burden greater than 50%.

Table 3 details the CHAS data for rental units in the City of Saint Paul by their affordability compared with renter households at these income levels who have one or more of the HUD defined severe housing programs. This table also includes information for units affordable to and households who are at income levels between 30% AMI and 50% AMI. This income range is further described in the "other populations" Qualifying Population type in section 4, later in this plan.

Table 3: Housing Needs Inventory and Gap Analysis

| | **Current Inventory** | **Level of Need** | **Gap Analysis** |
|---|---|---|---|
| | # of Units | # of Households | # of Households |
| Total Rental Units | 56,225 | | |
| Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness) | 10,985 | | |
| Rental Units Affordable to HH at 30-50% AMI (Other Populations) | 16,205 | | |
| 0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness) | | 16,280 | |
| 30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations) | | 7,845 | |
| Current Gaps (30% AMI)<br>Current Gaps (50% AMI) | | | 5,295 (gap in 30%)<br>8,360 ("surplus" in 50) |

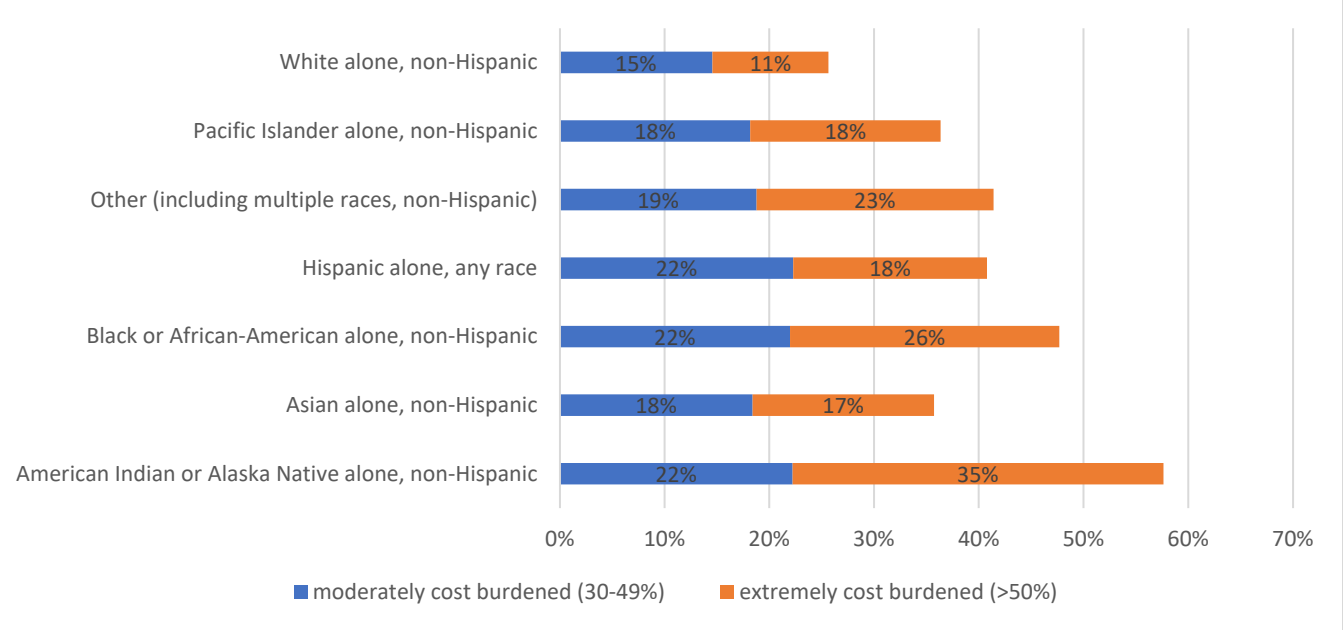
Source: HUD CHAS using ACS 2015-2019

As learned in engagement with housing providers, the lowest income renters at or below 30% AMI have the highest housing cost burdens, fewest housing options and are most at risk of experiencing homelessness. There are over 16,000 households in Saint Paul who are extremely low-income and have at least 1 or more of the severe housing problems, yet there are only 11,000 rental units that are affordable to these households. Even if all of the rental units affordable at this level were occupied by extremely low-income households with a housing problem defined by HUD, there would be a gap of nearly 5,300 rental units.

Families or individuals who are unable to obtain housing may double up with other households, increasing their risk for homelessness. The Saint Paul Public School District noted during a consultation with the CoC that many families experiencing housing instability are doubling up and often highly mobile and having to bus from outside school district to stay in a stable academic environment.

Households who are extremely low income are more at risk of housing instability when they are cost burdened. In Saint Paul, nearly 12,000 extremely low income households are also extremely cost burdened, spending more than 50% of their income on housing. As with people experiencing homelessness, BIPOC households are disproportionately more likely to be cost burdened compared to White households. Table 4 provides the share of all households cost burdened in Saint Paul by race and ethnicity.

Figure 2 : Share Cost Burdened by Severity by Race and Ethnicity




Source: HUD CHAS using ACS 2015-2019

**Existing Resources**

According to HousingLink through the Streams database, there is an inventory of nearly 9,900 total project based units that are subsidized in the City of Saint Paul to be affordable to households with incomes at or below 50% AMI, with 7,100 affordable to households at 30% AMI, as shown in Table 5, below.

Table 4: Total Subsidized Affordable Units in the City of Saint Paul

| | |
|---|---|
| Affordable to Households 30% AMI | 7,136 |
| Affordable to Households 50% AMI | 2,703 |
| Affordable to Households 60% AMI | 7,639 |
| Affordable to Households 80% AMI | 641 |
| Total Subsidized Affordable | 18,119 |

Source: HousingLink Streams (includes all federal, state and local publicly subsidized properties)

In addition to project-based affordability as documented in the HousingLink database, there are an additional 5,000 tenant-based Housing Choice Vouchers funded through HUD in use in the City of Saint Paul[3], and 83% of these vouchers are used by households with extremely low incomes.

Project-based or tenant-based subsidies are not the only forms of affordable housing in Saint Paul. As reported by Minnesota Housing Partnership[4], there are approximately 11,000 of so called naturally occurring affordable housing (NOAH) units in the city that are affordable to households between 40% and 60% AMI. Notably, none of these NOAH units are identified as being affordable below 40% AMI, so are generally out of reach for households at or below 30% AMI.

**Gaps and Unmet Needs**

Between the subsidized project based units and the tenant based vouchers available, there are 14,900 housing opportunities available for households who are very low or extremely low income. Yet, as reported in the CHAS data shown in Table 3, there is a gap of over 5,000 units that are affordable to extremely low income renters and

[3] HUD Picture of Subsidized Households, 2021, https://www.huduser.gov/portal/datasets/assthsg.html
[4] Minnesota Housing Partnership, Saint Paul Market Watch: https://mhponline.org/issue-2-saint-paul/

there is a demonstrated gap in both datasets for a need in deeply affordable rental housing, with and without services, for those who are at risk of homelessness and have incomes 30% AMI or below.

## 3. Survivors of Domestic Violence, Sexual Assault, Trafficking

The third qualifying population for the HOME-ARP funds include any individual or family who are fleeing or is attempting to flee domestic violence, dating violence, sexual assault, and human trafficking.

**Size and Composition**

Due to the sensitivity of survivor's circumstances, few data sources provide detailed information about this qualifying population.

In the 2022 PIT for Ramsey County, 210 individuals identified as being a Domestic Abuse Victim, seeking shelter to flee from violence, and are 15% of the total sheltered population.

As reported by Bridges to Safety[5], each year, the Saint Paul Police Department receives nearly 8,000 domestic violence calls for service and more than 1,400 Orders for Protection are filed with the Ramsey County Court. In the last ten years, 36 women and 23 children in Ramsey County were murdered as a result of domestic violence.

**Existing Resources**

Some of the resources available for survivors in the City of Saint Paul include the Bridges to Safety program, a collaborative of 18 member agencies who provide services to survivors in Ramsey County. Women's Advocates[6] provides some hotel styled shelter access. In fiscal year ending June 30, 2021, Women's Advocates served 145 survivors and children in emergency shelter settings. The average stay for residents was 79 days.

**Gaps and Unmet Needs**

This population has unique needs compared to other populations due to the security needs of survivors. Women's Advocates reported that it is difficult to move survivors and their families from emergency shelter situations to permanent housing and noted that temporary transitional housing in a noncongregate setting may be valuable to serve this purpose. In addition, coordinated case management services are needed for these difficult cases.

## 4. Other Populations

The fourth category of HOME-ARP qualifying populations are other populations where providing supportive services or assistance would prevent the family's homelessness or would serve those with the greatest risk of

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[5] Bridges to Safety: https://www.bridgestosafety.org/aboutdv.html
[6] Women's Advocates: https://www.wadvocates.org/

housing instability. HUD defines these populations as individuals and households who do not qualify under any of the other qualifying populations for the program but are either 1) previously homeless or 2) are at greatest risk of housing instability.

The temporary emergency rental assistance funded through the American Rescue Plan and earlier COVID legislation had significant impacts on household stability for those at risk of instability or previously homeless for the duration of that assistance. With those programs ending, and the evictions moratorium enacted during the pandemic ended, more of these households are again at risk of instability or a return to homelessness.

**Size and Composition**

1. Previously Homeless

Previously homeless under the HOME-ARP Qualifying Population definition includes those who have previously been qualified as homeless, are currently housed due to temporary or emergency assistance, and who need additional housing assistance or supportive services to avoid a return to homelessness. According to Heading Home Ramsey's dashboard[7], during 2021, a total of 567 people entered into permanent housing from homelessness, with a total of 3,177 persons in permanent housing who were previously homeless. Additionally, a total of 325 people entered into rapid rehousing during the year, with a total of 792 persons in rapid rehousing. These populations are at risk of a recurrence of homelessness.

2. At Greatest Risk of Housing Instability

Those who are greatest risk of housing instability are defined in HOME-ARP guidance as either being a severely cost burdened extremely low income renter household (household with incomes at or below 30% AMI and paying more than 50% of their income towards housing), or as being a low income household within incomes up to 50% AMI and being at risk of homelessness.

According to the CHAS data, there are 11,190 extremely low income households who are extremely cost burdened in the City of Saint Paul. These are included in Table 3, above.

There are 11,275 renter households in the City of Saint Paul with incomes between 30 and 50% AMI and 7,845 of these households have one of the four CHAS housing problems, which is one way to identify being at risk of homelessness.

**Existing Resources**

The existing resources for these populations are synonymous with those identified for those at risk of homelessness in section 2 above. As shown in Table 5, there are 7,136 units subsidized and affordable to 30% AMI in Saint Paul and an additional 2,703 units affordable to those households between 30-50% AMI.

[7] https://data.ramseycounty.us/Demographics-/Homeless-persons-entering-Rapid-Rehousing-or-Perma/6v2s-ycj2

**Gaps and Unmet Needs**

While the CHAS data in Table 3 suggest a surplus of housing units affordable to those between 30-50% AMI, the circumstances are such that higher income households often occupy rental housing that is technically affordable to below their AMI level. However, access to deeply affordable housing opportunities may be more limited for populations that don't meet the "at risk of homelessness" definition and are not prioritized through homeless prevention programming.

## Determination of Level of Need Gaps in the Inventory and Service Delivery System

This evaluation identified the activities where gaps are largest or most critical. As described throughout each section on Qualifying Populations, there are significant gaps in the shelter system and housing inventory to meet the needs of extremely low income Saint Paul households. Households who are precariously housed or experiencing homeless do not have enough housing opportunities available to meet the needs. The service delivery system remains strained as the infusions of federal resources during COVID are waning.

## Priority Needs for Qualifying Populations

Though this analysis, the City ~~has~~ had identified the following two priority needs for HOME-ARP resources to meet the needs of all qualifying populations:

- Non congregate shelter (NCS) for unsheltered or sheltered homeless people who are unable to stay in congregate shelters, this may include elders, families, unrelated couples, or others with medical needs or other circumstances where privacy is necessary, such as for DV survivors.
- Supportive services to assist households to achieve and maintain housing stability. These services would prioritize all qualifying populations while the types of services offered may tailored towards the needs of each qualifying population. For example, a household who is homeless will require more intense, immediate services than households needing to stabilize their current housing situation.

However, with no current NCS project identified, the City of Saint Paul has determined that the priority need, as evidenced by the analysis and consultations, continues to be affordable housing.

The City of Saint Paul determined the level of need and gaps in the community's shelter and housing inventory and in the service delivery systems based on the data analysis and qualitative feedback gained through consultations. There are needs across all of the priority populations and gaps in each system; yet the most acute needs are for those who are homeless, at risk of homelessness, or are DV survivors. The priority for these qualifying populations and the adjustment to meet those needs through affordable housing development will serve the community need. ~~NCS and supportive services activities to meet their needs is based in part on the sunsetting of the existing NCS stood up during the pandemic and the wish to provide a more permanent solution of this opportunity in the community.~~

# HOME-ARP Activities

The City of Saint Paul will use HOME-ARP funding to ~~acquire and~~ develop ~~non-congregate shelter (NCS)~~affordable housing, and leverage the one-time funds to establish appropriate supportive services consistent with the requirements in the HUD issued notice, CPD-21-10 "Requirements for the Use of Funds in the HOME-American Rescue Plan Program".

The City will retain up to 15% to pay for administration and planning for the grant.

Table 5: Funding Distribution

| | **Funding Amount** | **Percent of the Grant** | **Statutory Limit** |
|---|---|---|---|
| Supportive Services | $ ~~50,000~~* | | |
| Acquisition and Development of Non-Congregate Shelters | $ ~~6,080,700~~ | | |
| Tenant Based Rental Assistance (TBRA) | $ 0 | | |
| Development of Affordable Rental Housing | $ 5,780,052 | | |
| Non-Profit Operating | $ 0 | - | 5% |
| Non-Profit Capacity Building | $ 0 | - | 5% |
| Administration and Planning | $ 1,020,009 | 15% | 15% |
| Total HOME-ARP Allocation | $ 6,800,061 | | |

*Correction made 04/09/2026 to redline this $50,000, which was part of overall budget change in amendment but not reflected in the table.

## Selection of Developers, Service Providers, Subrecipients and/or Contractors:

~~The City of Saint Paul will acquire a suitable property for NCS and solicit applications through a competitive request for proposals (RFP) and/or competitive bids as appropriate to seek contractors, service providers, and/or subrecipients to carry out the HOME-ARP activities identified in the plan. The City expects to issue such solicitations during calendar year 2024 and will publicize the availability through the City's email list serves and other distribution channels.~~

The City of Saint Paul will utilize its pipeline of affordable housing development activities to identify appropriate projects for HOME ARP funding.

## Administration of Eligible Activities

The City of Saint Paul will administer the HOME-ARP grant directly.

No portion of the City's HOME-ARP administrative funds were provided to a subrecipient or contractor prior to HUD's acceptance of this plan.

## Distribution of HOME-ARP Funds with Priority Needs Identified – Rationale for Proposed Plan

Characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provide a rationale for the plan to fund eligible activities.

**Affordable Rental Housing Development**

Rental housing affordable to households at or below 30% AMI is a persistent identified need for the City of Saint Paul. The City had not initially prioritized this activity for the proposed HOME-ARP plan because substantial resources through other ARPA funding had been dedicated to a 30% AMI rental housing fund, and a NCS project was identified. However, the no current NCS project is identified and the City has adjusted to prioritize the funding for use in the development of affordable rental housing.

**Administration and Planning**

The City has planned for the use to up to 15% of the total HOME-ARP allocation to fund administration and planning activities, which will be carried out by city staff. If actual staff costs and administration expenses are less than the total 15%, the remainder will be allocated to ~~the NCS or supportive services activities.~~the program activities

Activities not prioritized in the current allocation plan amendment:

**Non-Congregate Shelter (NCS)**

Consultation and data analysis indicates that NCS is a need among qualifying populations for the HOME-ARP funds. During the pandemic, there were some NCS options created on a temporary basis and was found to be a critical resource for persons experiencing homelessness who were unable to access traditional congregate shelter settings. Qualifying populations with medical needs or other family situations will benefit from the private nature of NCS. The City has determined NCS as a priority need for HOME-ARP because it is the only resource the City has identified that can assist certain unsheltered and sheltered populations in this manner. While the NCS is a temporary shelter and not permanent or transitional housing, there are not requirements to establish limits on the length of stay and the shelter could serve as a longer-term temporary situation.

**Supportive Services**

Through the consultations, stakeholders identified the need for supportive services to assist households in accessing and maintaining housing. The supportive services allowable under the HOME-ARP program are wide ranging and include activities that are not presently covered for some service providers, including financial assistance such as security deposits, moving costs, and rental arrears. The range of activities would allow for customized and specific case management to assist qualified populations in the NCS and beyond to establish housing stability for these families and individuals.

**Nonprofit Operating and Capacity Building Assistance**

The City is prioritizing operating and capacity building assistance to nonprofits, up to the statutory caps of 5% of total grant each, to increase the capacity of project developers/administrators in developing NCS and deploying supportive services. These resources would be made available in conjunction other HOME-ARP program activities and if are not needed, or an amount less than the cap is needed, the remainder of the funds will be allocated to the NCS or supportive services activities.

**Other Activities not Prioritized in Proposed Plan**

Similarly, the City is not prioritizing the need for tenant based rental assistance in this plan because there are existing resources in use and the data and consultations reflected a need for additional capacity in the shelter and deeply affordable housing inventory across the City.

## HOME-ARP Production Housing Goals

~~The City does not intend to develop rental housing for qualifying populations with its HOME-ARP allocation.~~ Utilizing the full funding amount for affordable housing development, minus the administration costs, is expected to result in approximately 25-30 assisted housing units.

## Preferences & Referral Methods

**Preferences**

All Qualifying Populations (QPs) will have access to the HOME-ARP programming and no preferences will be made among all the QPs. ~~(NCS or supportive services). Preference for the City's HOME-ARP Program will be for households who meet the criteria of the Homeless Qualifying Population (QP1) defined through the Notice. Those households who meet the preference will be prioritized based on the highest number of criminal justice contacts.~~

**Limitations**

No limitations are in place that will put any QP from eligibility from HOME-ARP services.

**Referrals**

The City will permit the use of a project/activity waiting list as an eligible HOME-ARP method of referrals. Eligible QPs will be placed on the waiting lists in chronological order of application.

~~An initial referral form will include questions pertaining to this preference of QP1 with high level of criminal justice contacts or other institutional settings. The referral form will ask for specifics of type of contacts and how frequently, e.g. number of recent criminal justice related contacts, or number of times in and out of shelter or hospital in a recent time period. Staff may also need to do additional research into this as the referring provider may not know specifics. Staff will have access to information and databases to make those assessments.~~

~~The referral form, an online tool, will be accessible to all providers. It will be marketed and distributed through the Ramsey County CoC network of providers (who serve families, youth, singles, has contacts with schools, with permanent supportive housing providers, etc), and any other providers to ensure that all qualifying populations have access. This will be documented within an affirmative marketing plan.~~
~~The referral form would also include prioritization factors which assist in creation of a wait list in order of prioritization ("ties" and others would be placed on the wait list in chronological order of referral).~~

~~Once a referral has made it to the top of the list, an offer is made and staff will attempt to contact the household to see whether person or household is willing to participate in program. When needed, Familiar Faces staff will be dispatched to find the referral to ensure that the household is provided an option to participate. If the household size does not fit the occupancy standards of the available unit in the non congregate shelter, they will be referred to more appropriate programming within the CoC system and offered temporary shelter within the Familiar Faces NCS in the interim. For example, a family that exceeds occupancy standards for dwelling size of the NCS units would be temporarily sheltered and provided assistance to refer to a family shelter or other options. They would not be denied services in the Familiar Faces program during this referral period.~~

~~Once a referral is admitted into the programming, a full needs assessment occurs to begin development of a supportive services plan if the household would like to engage with this component of the program.~~

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## HOME-ARP Refinancing Guidelines

The City does not intend to use HOME-ARP funds to refinance existing debt.