

2025-29 CONSOLIDATED PLAN  
ANNUAL ACTION PLAN -  
DRAFT

PROGRAM YEAR 2026: June 1, 2026 – May 31, 2027

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



**SAINT PAUL**  
MINNESOTA

# CITY OF SAINT PAUL, MINNESOTA

## CONSOLIDATED PLAN 2025-2029

### ANNUAL ACTION PLAN 2026-27

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#### TABLE OF CONTENTS

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<b>AP-05</b>	<b>Executive Summary</b>	
1.	Introduction	<b>1</b>
2.	Summary of Objectives and Outcomes Identified in Plan	<b>2</b>
3.	Evaluation of Past Performance	<b>2</b>
4.	Summary of Citizen Participation Process and Consultation Process	<b>3</b>
5.	Summary of Public Comments	<b>4</b>
6.	Summary of Comments or Views Not Accepted and Reason for Non-Acceptance	<b>4</b>
7.	Summary	<b>4</b>
	<b>Lead and Responsible Agencies</b>	
	PR-05 Lead and Responsible Agencies 24 CFR 91.200(b), 91.220(b)	<b>6</b>
	<b>FY 2026-27 Annual Action Plan</b>	
	AP-10 Consultation – 91.100, 91.200(b), 91.215(l) Agencies, Groups, Organizations, and Others Consulted	<b>8</b>
	AP-12 Participation – 91.05, 91.200(c) Citizen Participation Outreach Efforts	<b>21</b>
	AP-15 Expected Resources – 91.220(c)(1,2)	<b>26</b>
	AP-20 Annual Goals and Objectives – 91.420, 91.220(c)(3) & (e)	<b>30</b>
	AP-35 Projects – 91.220(d)	<b>35</b>
	AP-38 Project Summary	<b>37</b>
	AP-50 Geographic Distribution – 91.220(f)	<b>44</b>
	AP-55 Affordable Housing – 91.220(g)	<b>46</b>
	AP-60 Public Housing – 91.220(h)	<b>47</b>
	AP-65 Homeless and Other Special Needs Activities – 91.220(i)	<b>50</b>
	AP-75 Barriers to Affordable Housing – 91.220(j)	<b>55</b>
	AP-85 Other Actions – 91.220(k)	<b>57</b>
	AP-90 Program Specific Requirements	<b>62</b>

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<b>Attachments - Unique Appendices</b>	
Attachment A - Capital Improvement Board (CIB) Funding Recommendations and Public Hearing Comments	<b>67</b>
Attachment B - AAP Public Comments	<b>74</b>
Attachment C - City and CDBG Funding and Budget Processes	<b>75</b>
Attachment D - CDBG Qualified Census Tracts	<b>80</b>
Attachment E - ESG Program Guide	<b>81</b>
Attachment F - Citizen Participation Plan	<b>179</b>
Attachment G - NRSA Railroad Island and Hamms	<b>186</b>
Attachment H - HOME-ARP Allocation Plan Amendment	<b>219</b>
Attachment I - Affidavit of Publication	<b>242</b>
Attachment J - SF-424s, Assurances, and Certifications	<b>243</b>
Attachment K - Glossary of Terms, Acronyms, and Abbreviations	<b>244</b>

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# Executive Summary

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

### 1. Introduction

This document is the one-year Annual Action Plan (AAP) for the 2026 program year, as part of the 2025-2029 Consolidated Plan for the City of Saint Paul, Minnesota and to be submitted to the U.S. Department of Housing and Urban Development (HUD). The AAP coordinates the City's housing and economic development plans with other public, private and non-profit community housing providers, and non-housing service agencies to identify priorities that align and focus funding from the HUD formula block grant programs: Community Development Block Grant (CDBG) Program, HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) Program.

The AAP includes the City's application for 2026 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, and ESG funding to support programs that assist individuals and families to quickly regain stability in permanent housing after experiencing a housing crisis or homelessness.

Saint Paul is considered an entitlement community by HUD. Eligibility for participation as an entitlement community is based on population data provided by the U.S. Census Bureau and metropolitan area delineations published by the Office of Management and Budget. HUD determines the amount of each entitlement grantee's annual funding allocation formula, which uses several objective measures of community needs including the extent of poverty, population, housing overcrowding, age of housing, and population trends in relation to other metropolitan areas.

As of drafting this document, the City has not received notice of funding allocations for 2026 due to the delayed federal budget. The City estimates similar funding to 2025 for this program year: \$6,756,518.00 in CDBG funding, \$1,423,385.52 in HOME funding, and \$594,589.00 in ESG funding. In addition, the City estimates using about \$293,482 in CDBG program income and approximately \$1,285,692 in HOME program income. Program income is directly generated from a CDBG or HOME program funded activity, such as loan repayments. Because the federal budget allocations for 2026 have not yet been distributed by HUD, the City will follow a contingency plan for different funding amounts: Should the City receive an amount higher or lower than the estimates from last program year, activities may be adjusted in direct proportion to the difference in actual allocations, and estimated Program Income may also adjust. This document is due for submission to HUD by April 15, 2026, which is forty-five days before the City's June 1, 2026, program year begins. However, as the 2026 budget was delayed, this submission will be delayed until known allocations are provided by HUD.

## **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 assessment and market analysis, citizen participation process, and agency consultation during the development of the Consolidated Plan, the City of Saint Paul has identified priority needs in the Strategic Plan. These priorities include:

- Preservation of existing affordable housing;
- Development of new affordable housing;
- Support stable, affordable, and well-maintained homeownership;
- Emergency shelters, unsheltered prevention and support services;
- Public services, including tenant and landlord education;
- Fair housing and housing anti-discrimination efforts;
- Pre-development support, including lead-based paint abatement, acquisition, demolition, and clearance of property;
- Improve public infrastructure, city facilities, and community spaces;
- Economic development and job growth;
- Community outreach and engagement;
- Community planning needs;

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

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

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

The City continues to seek expanded economic opportunities that benefit its low-and moderate-income citizens, preserve and create decent and affordable housing opportunities, address the needs faced by those who are homeless or are threatened with homelessness, provide accessible public services for vulnerable populations, affirmatively further fair housing, and leverage its federal HUD funding with other funds to make significant, sustainable change in the community. The need for affordable housing and related services has not lessened in recent years, making these HUD dollars even more important.

During the 2024-2025 program year, the City and its partners provided housing assistance to 172 households through CDBG-funded activities and added 10 units of affordable rental housing through HOME-funded activities. The City also worked with three community development organizations to assist low- to moderate-income (LMI) homeowners with housing rehabilitation, and three community development organizations to assist with economic development activities in low- to moderate-income areas (LMA) and with job creation and retention efforts for serve LMI residents.

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

During the 2024-2025 program year, the City's ESG program funded eligible activities for 3,968 people in the form of homelessness prevention, emergency shelter operations, street outreach, rapid re-housing services, data collection, and ESG program administration.

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

Summary from citizen participation section of plan.

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

A public hearing was held during the CIB funding cycle, a two-year cycle, in 2025 to ask for comments on funding selection and priorities prior to the Committee making its formal recommendations to the Mayor and Council in June, 2025. There are additional comment periods and public hearings held during the adoption of the City budget and the Consolidated Planning development process, including during the second year of the CIB cycle.

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

The public comment period for this document will occur from March 2 through April 1, 2026. Notification of the availability of the draft document was sent out through the City's Early Notification System (ENS) and a public notice published in the *Pioneer Press*. The notice included information for persons needing special accommodations and assistance for non-English speaking residents. The document was made available for review on the Department of Planning and Economic Development's website. The City is holding a public hearing on March 19 2026, at the Riverview Library. All comments received will be considered and are included in Attachment B. Copies of the document were also made

available at PED and in the Mobile Library. A poster is displayed at all Saint Paul Public library branches with instructions to access the draft plan using a library or a home computer.

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

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

A summary of the comments received during public hearings held during the CIB funding cycle and City budget cycle for 2026 through 2027 are included in Attachment A. Notice of the availability of this document was made through publication in a City Council designated newspaper of general circulation (the Pioneer Press) and sent through the City ENS. The public comment period for this document is March 2 through April 1, 2026, and a public hearing for comment is scheduled for March 19, 2026 at Riverview Library. Another opportunity for public comment will be at an upcoming City Council meeting to authorize acceptance of the HUD award and submission of AAP to HUD. The date of the City Council meeting is TBD, awaiting final HUD allocation amounts for 2026. Copies of the document were made available via the City's website, at PED, and on the Saint Paul Public Library's Mobile Library. A poster is displayed at all Saint Paul Public library branches with instructions for how to access the draft plan using a library or a home computer. Public comments received will be summarized in final submission to HUD.

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

No public comments or views were not accepted to date. The public comment period for this document is March 2 through April 1, 2026, and a public hearing is scheduled for March 19, 2026 at Riverview Library. Copies of the document are made available via the City's website, at PED, and at the City of Saint Paul Public Library's Mobile Library. A poster was displayed at all Saint Paul Public library branches with instructions to access the draft plan using a library or a home computer. Another opportunity for public comment will be at an April City Council meeting to authorize acceptance of the HUD award and submission of AAP to HUD. Final Date of that meeting is to be dermined as may be later due to the delayed federal budget. The City will summarize those comments in the final submission.

## **7. Summary**

The Planning and Economic Development Department (PED), Finance and Administration, Grants Compliance Division is the CDBG Administrator and lead agency responsible for the preparation of the PY 2026-27 Annual Action Plan for HUD grant funds. PED's Housing Division administers programmatic investments utilizing HOME program funding. Under a Joint Powers Agreement with the City of Saint Paul, Ramsey County administers ESG program funding allocated to Saint Paul.

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

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

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

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

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

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

**Table 1 – Responsible Agencies**

**Narrative (optional)**

The Department of Planning and Economic Development (PED) of the City of Saint Paul was established in 1977, and is responsible for the planning, housing, and economic development activities throughout the city. PED’s mission is to build community wealth through business, housing, jobs, planning, and financial and cultural assets. The City’s Housing and Redevelopment Authority (HRA) is a legally distinct public entity which undertakes housing, commercial, and business development activities through property acquisition, housing development, real estate finance, and business loans.

PED has 90 full-time employees that work on our four department teams – Administration & Finance, Economic Development, Housing, and Planning (which includes Heritage Preservation and Zoning). The 2026 adopted PED operations admin. budget is \$15.4 million and the 2026 adopted total HRA budget is \$47.1 million.

PED finances affordable housing development, down payment assistance, emergency rental assistance, tax increment and bond financing, and manages \$62.8 million of parking assets (net of depreciation). The Economic Development division within PED implements economic development strategies including promoting commercial corridors, business retention and recruitment, and small business lending.

**Annual Action Plan Public Contact Information**

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

Written comments should be sent to the following address:

City of Saint Paul, Planning and Economic Development  
Attn: Jessica Deegan  
City Hall Annex, Suite 1100  
25 West 4th 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 several organizations, local government agencies, and City departments throughout the Consolidated Plan process for the overarching 2025-2029 Consolidated Plan. The City held two public hearing meetings and requested information via phone, e-mail, online and paper surveys, and face-to-face interviews with organizations for the Consolidated Plan.

The City's Housing staff consults with the Saint Paul Public Housing Agency (SPPHA), Minnesota Housing Finance Agency (MHFA), Ramsey County, community housing development corporations, for-profit and non-profit housing developers, and organizations and institutions that provide resources to finance, construct, and preserve affordable housing citywide. The City annually provides opportunities for public input on spending priorities through the Capital Improvement Budget (CIB) and overall City budget. A public hearing on the proposed CIB budget was held on June 8, 2025, at the Rondo Community Library. The CIB committee heard public testimony regarding preliminary recommendations for funding of Community Proposals for 2026 and for 2027 capital improvement funds. The CIB Committee is an advisory body of 18 Saint Paul residents that recommends projects and funding levels to the Mayor every year by June 30. Meeting minutes, including public comments received on the CIB funding proposals, are included in Attachment A.

The City's Emergency Solutions Grant (ESG) funds are allocated to programs that 1) promote a comprehensive delivery of homeless services; 2) assist underserved communities; 3) provide services as needed to achieve the goals of the CoC, Ramsey County Family Homeless Prevention and Assistance Program (FHPAP), and ESG; and 4) address City concerns while meeting HUD's national housing objectives.

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

The City's Housing staff consults with Ramsey County, Ramsey County Continuum of Care (CoC), Saint Paul PHA (SPPHA), community housing development organizations/community development corporations (CHDOs/CDCs), and housing developers to ensure residents have access to quality affordable housing citywide. The City's ESG grant is administered in coordination with Ramsey County Housing Stability Department, whose staff plays a pivotal role in Heading Home Ramsey (HHR), CoC, leadership, data, and evaluation support staff, and nongovernmental homeless services providers.

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

The Saint Paul Police Department supports the City's vision of a community-first public safety approach through the assignment of Behavioral Health Liaisons. These liaisons are comprised of sworn police officers who refer information concerning vulnerable populations to County and State mental health resources. The goal of the Behavioral Health Liaisons is to connect vulnerable or underrepresented

persons with resources to support long-term stabilization and to reduce interactions with the criminal justice system.

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

The City continues its current Joint Powers Agreement (JPA) with Ramsey County, through August 2027, to allocate its Emergency Solutions Grant (ESG) funds for programs that 1) promote a comprehensive delivery of homeless services; 2) assist underserved communities; 3) provide services as needed to achieve the goals of the CoC, Ramsey County's Family Homeless Prevention and Assistance Program (FHPAP), and ESG; and 4) address City concerns while meeting the U.S. Department of Housing and Urban Developments (HUD's) national housing objectives.

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

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

Additionally, in 2024, the current JPA was amended to include new language about the solicitation process for ESG. ESG now alternates conducting a full solicitation process with ESG subrecipients, followed by a Letter of Interest (LOI) process on alternate years. Further, with the assistance of HUD technical assistance, Ramsey County revised the ESG monitoring process to align with HUD's requirements for monitoring. This included review of ESG-funded activities; evaluation for eligible expenditures and activity funding; administration of HMIS; and tools to assess activity/subrecipient adherence to federal requirements to achieve goals as described in a subrecipient's written funding agreement.

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

The City continues its current JPA with Ramsey County, through August 2027, to allocate its ESG funds for programs that 1) promote a comprehensive delivery of homeless services; 2) assist underserved

communities; 3) provide services as needed to achieve the goals of the CoC, Ramsey County FHPAP, and ESG; and 4) address City concerns while meeting HUD's national housing objectives.

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

Ramsey County conducts quarterly meeting with ESG providers to provide updates on key policies and processes, show grant expenditure benchmarks, and facilitate best practice discussions.

Ramsey County follows HUD approved and HUD TA developed monitoring processes for its subrecipients. Monitoring includes review of ESG-funded activities; evaluation for eligible expenditures and activity funding; administration of HMIS; and tools to assess activity/subrecipient adherence to federal requirements to achieve goals as described in a subrecipient's written funding agreement.

Additionally, following a HUD Monitoring in 2024, Ramsey County has provided a template of written standards to subrecipients and all maintain such written procedures.

**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**

1	<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 Non-Homeless Special Needs 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, affordable housing development, economic development initiatives, and public service programs addressing public health services, tenant advocacy and landlord training. An anticipated outcome is that the County provides comments on the City's draft Annual Action Plan.

2	<b>Agency/Group/Organization</b>	Ramsey County Continuum of Care
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Services - Victims Other government - County Continuum of Care
	<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 Non-Homeless Special Needs Anti-poverty 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>	City of Saint Paul's ESG grant is administered through a Joint Powers Agreement (JPA) with Ramsey County except where the County receives funds as a subrecipient, City serves as administrator for funding awarded to the County as a subrecipient. City staff consults with Ramsey County Continuum of Care (CoC) Coordinator and other staff bi-weekly, attends quarterly CoC Governing Board and monthly Steering Committee meetings to implement comprehensive services to assist homeless and at-risk of being homeless residents. The outcome is that through coordination with CoC staff and the CoC Governing Board recommendations for funding for City ESG and CoC services are complementary. Other outcomes are the development of ESG and CoC program evaluations, additional service provider staff training, and increased service coordination.

3	<b>Agency/Group/Organization</b>	Saint Paul Public Housing Agency
	<b>Agency/Group/Organization Type</b>	PHA Services - Housing Services-Children Services-homeless Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy 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>	City and PHA staff participate on an on-going basis with the CoC and Family Homelessness Prevention Assistance Program Committee and other housing initiatives. City and PHA have a working partnership which recognizes the challenges faced by the PHA administration and PHA residents. Outcomes include an understanding of the PHAs Rental Assistance Demonstration, capital improvement needs, and the high demand for subsidized rental units demonstrated by extensive waiting lists for public housing and housing vouchers; and PHAs Project-Based Section 8 Housing Choice Vouchers will assist eligible affordable housing projects financed by the City.
4	<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 distinct 501(c)3 organizations make up the collective District Councils. The City contracts with these organizations to engage residents and businesses in community development planning and decision making, provide planning and advising on the physical, economic, and social development of their areas; identifying needs; and initiating community programs.
5	<b>Agency/Group/Organization</b>	Minnesota Homeownership Center
	<b>Agency/Group/Organization Type</b>	Housing Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<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 housing staff participates with the Minnesota Home Ownership Center (MNHOC) to implement home ownership programs such as home buyer counseling/education, mortgage foreclosure prevention counseling, and home buyer initiative for underserved communities. The anticipated outcome is the continual development of multi-lingual and multi-cultural homeownership classes and mortgage foreclosure counseling services. City staff also participates with MNHOCs Home Ownership Alliance. Anticipated outcomes are long-term homeownership strategies that may reduce the racial disparity in homeownership
6	<b>Agency/Group/Organization</b>	Independent School District #625
	<b>Agency/Group/Organization Type</b>	Services-Education Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children

	<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 staff and Saint Paul Public Schools (SPPS) Homeless Liaison serve as committee members of the CoC Governing Board and the Ramsey County Family Homelessness Prevention Assistance Program (FHPAP). Staff also consulted SPPS on efforts related to data collection on children experiencing homelessness. Anticipated outcomes are more shelter beds for families, particularly those with school-aged homeless children, and unaccompanied youth.
7	<b>Agency/Group/Organization</b>	Capital Improvement Budget Committee
	<b>Agency/Group/Organization Type</b>	Planning organization Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment 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>	The Capital Improvement Budget (CIB) Committee, a volunteer organization made up of citizens, reviews and ranks all proposals for CDBG funds over the course of several public meetings in the two-year cycle. After thorough review and public hearing, the CIB Committee makes recommendations to elected officials on the allocation of CDBG funds. Those recommendations are sent out to neighborhood organizations and posted on the City website for additional comment. The CIB budget is then incorporated into the City budget cycle where a second public hearing is held before adoption. Anticipated outcomes of this process include thorough review and community engagement of the applications received for CDBG funding.
8	<b>Agency/Group/Organization</b>	Full Stack Saint Paul Steering Committee
	<b>Agency/Group/Organization Type</b>	Services - Narrowing the Digital Divide Other government - Local Regional organization Business and Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Narrowing digital divide

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Full Stack and MSP Tech Hire works to find best in class vendors that provide tech training and bootcamps, then provides scholarships to low income residents and under-represented residents to attend at little to no cost. Organizations we partner with here include Prime Digital Academy, Software Guild, and IT Ready. We work with Ramsey County Workforce Solutions to screen and vet for other public assistance. We also launched a new youth focused cohort with Right Track. Full Stack is also sponsoring multiple events each year with partners working to provide access to tech and innovation related training, careers, networking, and entrepreneurial growth. Examples include Code Switch, Hack the Gap, and Lunar Startups.
9	<b>Agency/Group/Organization</b>	Connectivity Blueprint
	<b>Agency/Group/Organization Type</b>	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Narrowing digital divide
	<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 of St. Paul's Office of Technology & Communication (OTC) has partnered with Ramsey County and continues to participate in a workgroup called Connectivity Blueprint.
10	<b>Agency/Group/Organization</b>	Emergency Management Council
	<b>Agency/Group/Organization Type</b>	Services - Broadband Internet Service Providers Agency - Managing Flood Prone Areas Agency - Emergency Management Other government - Federal Other government - State Other government - County Other government - Local Regional organization Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Emergency Management

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

<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>The City of St. Paul partners with the Ramsey County Workforce Solutions and Ramsey County Libraries to work on many digital initiatives. As part of the initiatives, the community services department of the Saint Paul Public Libraries (SPPL) provided 137 virtual digital literacy classes in Spanish in partnership with CLUES. These classes have continued in 2022, and are now provided three times a week, and community services measures student outcomes with the Northstar Digital Literacy assessment, measuring students grasp of various concepts like email and internet basics. Another initiative allowed SPPL to distribute 500 hotspots for long term loan through the Emergency Connectivity Fund. SPPL's digital navigators assisted patrons with set up and skill-building through this initiative. SPPL is awaiting word on further device and hotspot loan, to assist patrons in accomplishing goals both daily and long term, and in connecting with the library's digital resources.</p>
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**Identify any Agency Types not consulted and provide rationale for not consulting**

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

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Ramsey County	City ESG funding priorities and Ramsey County CoC strategic priorities have similar goals and priorities are complementary. ESG grant dollars are managed under the terms of a Joint Powers Agreement which ensures alignment with Ramsey County CoC priorities. The partnership with Ramsey County benefits Saint Paul residents and people experiencing homelessness through coordination of funding and programming across the CoC.
Imagine 2050	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 Councils Imagine 2050 plan document.
Saint Paul 2040 Comprehensive Plan	City of Saint Paul	The City's Comprehensive Plan is in line with the City's strategic priorities for HUD funded activities.
Analysis of Impediments to Fair Housing Choice -AI	Fair Housing Implementation Council and Consultant	The priority need, Fair Housing and Anti-Discrimination efforts, and the Affirmative Fair Housing actions in the City's strategic plan will be in coordination with the Analysis of Impediments to Fair Housing Choice.

Saint Paul Housing Trust Fund Resolution	City of Saint Paul	The Housing Trust Fund and resolution 18-1204 for action to create and preserve housing that is affordable at all income levels, address racial, social and economic disparities in housing, and create infrastructure needed to stabilize housing for all in Saint Paul, is in line with the City's strategic priorities for HUD-funded activities.
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**Table 2 – 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 Capital Improvement Budget (CIB) process is the primary citizen participation effort for annual CDBG allocation. The Committee is comprised of 18 City residents representing Minnesota senate districts within the City. The Committee hears project proposals, scores and recommends project funding to Mayor and City Council. A public hearing was held for comments on funding selection prior to the Committee making its formal recommendations. Committee recommendation letters are included, Attachment A. The CIB process is done bi-annually and projects are approved for 2 years; Attachment C has details.

CIB recommendations were based on the City receiving the same level of funding from HUD in PY2026 as received in PY2025. The City estimates similar funding to 2025 for this program year: \$6,756,518.00 in CDBG funding, \$1,423,385.52 in HOME funding, and \$594,589.00 in ESG funding. In addition, the City estimates using about \$293,482 in CDBG program income and approximately \$561,006 in HOME program income. Program income is income directly generated from a CDBG or HOME program funded activity, such as loan repayments. Because the federal budget allocations for 2026 have not yet been distributed by HUD, the City will follow a contingency plan for different funding amounts: Should the City receive an amount higher or lower than the estimates from last program year, all activities may be adjusted in direct proportion to the difference in actual allocations, and estimated Program Income may adjust. This document is due for submission to HUD by April 15, 2026, which is forty-five days before the City's June 1, 2026, program year begins. However, as the 2026 budget was delayed, this submission will be delayed until known allocations are provided by HUD.

The CIB committee budget public hearing was held on June 8, 2025 for budget years 2026 and 2027, comments are in Attachment A. The public was able to give input on the City budget, which includes the CIB budget, through 7 in-person budget roundtables and online budget survey in April and May of 2025; 21 budget input and roundtable sessions, open the public, hosted with City Boards and Commissions throughout May and June of 2025; a City Council community input public meeting September 16, 2025; the Truth in Taxation public hearing on November 25, 2025; and at the City Council meeting approving the final budget on December 3, 2025.

Public comment period for this AAP will be held March 2 – April 1, 2026. Public notice was published in the *Pioneer Press*; notice of the availability of the draft document was sent through the City's Early Notification System (ENS); the document was available for review on the City

website and at the Saint Paul Public Library Bookmobile; a public hearing is scheduled March 19, 2026. Included was information for persons needing special accommodations and assistance for non-English speaking residents. Further opportunity for comment will be provided at the City Council meeting to authorize submission of the AAP and application for funds to HUD, which will be scheduled as soon as allocation amounts are known. All comments received were considered, Attachment A.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Internet Outreach	Non-targeted/broad community	CIB recommendations were posted on the City's website as a booklet and through Open Budget for review prior to adoption.		All comments were considered	<a href="https://www.stpaul.gov/departments/mayors-office/committees-boards-and-commissions/capital-improvement-budget-cib">https://www.stpaul.gov/departments/mayors-office/committees-boards-and-commissions/capital-improvement-budget-cib</a> <a href="https://www.stpaul.gov/departments">https://www.stpaul.gov/departments</a>
2	Public Meeting	Non-targeted/broad community	CIB Public Hearing on June 8, 2025		All comments were considered.	<a href="https://www.stpaul.gov/departments/mayors-office/committees-boards-and-commissions/capital-improvement-budget-cib">https://www.stpaul.gov/departments/mayors-office/committees-boards-and-commissions/capital-improvement-budget-cib</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)
5	Posted Public Notice and Public Libraries, Mobile Library	Non-targeted/broad community	Posters requesting input were displayed at all Saint Paul Public Library branches, March 2-April 1, 2026, with instructions to access the draft plan on the City's website from a public library or home computer. A hardcopy of the draft document was available on the Saint Paul Public Library's Mobile Library		All comments were considered.	
6	Public Hearing	Non-targeted/broad community	in person Public Hearing on the draft City AAP for PY 2026-27 March 19, 2026, 4:00 p.m.		Forthcoming	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
7	Public Meeting	Non-targeted/broad community	City Council Meeting, Date TBD, 2026, RES 26- XXX, approving submission of application for PY2026-27 application to HUD for CDBG, HOME, ESG funding and Annual Action Plan to HUD		Forthcoming	<a href="https://stpaul.legistar.com/Calendar.aspx">https://stpaul.legistar.com/Calendar.aspx</a>

Table 3 – Citizen Participation Outreach

## Expected Resources

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

#### Introduction

As of drafting this document, the City has not received notice of funding allocations for 2026, due to the delayed federal budget. The City estimates similar funding to 2025 for this program year: \$6,756,518.00 in CDBG funding, \$1,423,385.52 in HOME funding, and \$594,589.00 in ESG funding. In addition, the City estimates using about \$293,482 in CDBG program income and approximately \$561,006 in HOME program income.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	6,756,518	293,482	0	7,050,000	21,000,000	Assumes steady funding.

HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,423,385.52	1,285,692	0	2,709,077.52	4,500,000	Assumes steady funding.
ESG	public - federal	Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	594,589	0	0	594,589	1,770,000	Assumes steady funding.

**Table 4 - Expected Resources – Priority Table**

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

HUD requires that all participating jurisdictions (PJ) match, with non-federal funds, no less than 25 cents for each dollar of HOME funds spent on affordable housing. The City will continue to leverage private and public funds for HOME-funded affordable housing and accumulate additional match.

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

satisfy match requirements of another federal program, then funding from that program may not be used as match for ESG.

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

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

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

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

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

**Discussion**

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

In addition to Federal, State and local affordable housing investment vehicles noted above, Saint Paul has several programs directed toward holistic community development including job growth. These include:

- The Neighborhood STAR Program provides grants for physical (capital) improvement projects in Saint Paul neighborhoods. Projects must be neighborhood-based, designed in partnership with community stakeholders, and clearly address problems, needs and opportunities in Saint Paul. Eligible applicants include any public, private, nonprofit, or for-profit organization located in or doing business in Saint Paul.
- The Cultural STAR Program provides grants and loans to Saint Paul cultural projects and organizations. Most projects are in the Saint Paul Cultural District (bordered by I-94 to the north, the Lafayette Bridge to the east, the Mississippi River to the south, and Chestnut Road to the west). Cultural STAR grows Saint Paul's economy by strengthening the arts and cultural sector and supporting downtown as a vital cultural center. Cultural STAR and Neighborhood STAR is funded by Saint Paul's half-cent sales tax.

Saint Paul has a growth strategy focused on transit. Policy LU-1 of the 2040 Comprehensive Plan states, "Encourage transit-supportive density and direct the majority of growth to areas with the highest existing or planned transit capacity." Transit station areas are designated as Neighborhood Nodes, which are intended to be areas of higher intensity mixed-use development that support walkable access to jobs and services. There is currently one operating LRT line and one BRT line and one streetcar line and three BRT lines in the planning stages. Development, including higher density and affordable housing, is supported along these transit routes through planning, regional and state grants and city resources.

# Annual Goals and Objectives

## AP-20 Annual Goals and Objectives

## Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Homeless Prevention	2025	2030	Homeless	City-wide	Emergency shelters, unsheltered prevention and sup	ESG: \$594,589	Tenant-based rental assistance / Rapid Rehousing: 125 Households Assisted Homeless Person Overnight Shelter: 3000 Persons Assisted Homelessness Prevention: 400 Persons Assisted
2	Development of New Housing	2025	2030	Affordable Housing	City-wide	Development of new affordable housing	CDBG: \$475,000 HOME: \$2,438,169.79	Rental units constructed: 15 Household Housing Unit
3	Rental Housing Rehabilitation	2025	2030	Affordable Housing	City-wide	Preservation of existing affordable housing	CDBG: \$1,317,500	Rental units rehabilitated: 25 Household Housing Unit
4	Homeowner Housing Rehabilitation	2025	2030	Affordable Housing	City-wide	Support stable, affordable, and well-maintained ho	CDBG: \$1,277,500	Homeowner Housing Rehabilitated: 25 Household Housing Unit
5	Public Services	2025	2030	Non-Housing Community Development	City-wide	Public services, including tenant and landlord edu	CDBG: \$100,000	Public service activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted

<b>6</b>	Youth Employment	2025	2030	Non-Housing Community Development	City-wide	Public services, including tenant and landlord edu	CDBG: \$540,000.00	Public service activities other than Low/Moderate Income Housing Benefit: 250 Persons Assisted
<b>7</b>	Economic Development	2025	2030	Non-Housing Community Development	City-wide	Economic development and job growth	CDBG: \$350,000.00	Businesses assisted: 15 Businesses Assisted
<b>8</b>	Remediation of Substandard Properties	2025	2030	Non-Housing Community Development	City-wide	Pre-development support, including lead-based pain	CDBG: \$175,000.00	Buildings Demolished: 17 Buildings
<b>9</b>	Public Improvements	2025	2030	Non-Housing Community Development	City-wide	Improve public infrastructure, city facilities, an	CDBG: \$1,400,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted

<b>10</b>	NRSA - Railroad Island/Hamms	2025	2030	Affordable Housing Non-Housing Community Development	RAILROAD ISLAND STRATEGY AREA	Preservation of existing affordable housing Development of new affordable housing Support stable, affordable, and well- maintained ho Economic development and job growth	CDBG: \$5,000.00	Homeowner Housing Added: 2 Household Housing Unit
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**Table 5 – Goals Summary**

**Goal Descriptions**

<b>1</b>	<b>Goal Name</b>	Homeless Prevention
	<b>Goal Description</b>	Address the needs of people experiencing homelessness through emergency shelter, rapid rehousing, and outreach.
<b>2</b>	<b>Goal Name</b>	Development of New Housing
	<b>Goal Description</b>	Address the need of new housing by providing assistance to develop newly constructed rental and homeowner housing.
<b>3</b>	<b>Goal Name</b>	Rental Housing Rehabilitation
	<b>Goal Description</b>	Address the need of sustaining decent housing by providing rehabilitation assistance to rental housing occupied by low/moderate-income households. Includes acquisition.

4	<b>Goal Name</b>	Homeowner Housing Rehabilitation
	<b>Goal Description</b>	Address the need of sustaining decent housing by providing rehabilitation assistance to homeowner housing occupied by low/moderate-income households.
5	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	Address public service needs through a variety of services that could include fair housing activities, community engagement, domestic violence prevention, criminal restorative justice, health care, employment training, conflict resolution, and emergency shelter.
6	<b>Goal Name</b>	Youth Employment
	<b>Goal Description</b>	Address needs of LMI youth through workforce training programming.
7	<b>Goal Name</b>	Economic Development
	<b>Goal Description</b>	Address the sustainability of economic opportunity by assisting businesses with technical assistance, rehabilitation or economic development activities.
8	<b>Goal Name</b>	Remediation of Substandard Properties
	<b>Goal Description</b>	Address the sustainability of a suitable living environment citywide through acquisition, clearance, relocation, historic preservation, remediation of environmentally contaminated properties, and building rehabilitation activities to the extent necessary to eliminate a specific condition(s) detrimental to public health and safety.
9	<b>Goal Name</b>	Public Improvements
	<b>Goal Description</b>	Address needs for public improvements through citywide facilities improvements and activities for publicly owned or non profit owned and open to the general public.
10	<b>Goal Name</b>	NRSA - Railroad Island/Hamms
	<b>Goal Description</b>	Direct targeted investments for housing and economic development to the Railroad Island/Hamms area neighborhood revitalization strategy area.

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

The project summary information provides a description and funding amount for each of the projects the City plans to undertake in program year 2026 with CDBG, HOME, and ESG program funding. The Capital Improvement Budget Committee (CIB) recommended capital projects through the two-year 2026-2027 capital improvement budget process, see Attachments A and C.

### Projects

#	Project Name
1	Acquisition Activities
2	Clearance Activities
3	Neighborhood Non-Profits
4	Youth Employment
5	Housing Construction
6	Single-Unit Rehabilitation
7	Multi-unit Rehabilitation
8	Commercial Corridor and Citywide Economic Development
9	Public Facilities Activities
10	ESG26SaintPaul
11	Planning and Administration
12	NRSA Railroad Island/Hamms

Table 6 - Project Information

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

Capital project priorities for CDBG funding were recommended by the Capital Improvement Budget (CIB) 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 affordable housing (single-family, multi-family, for sale and rental).

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

The City's ESG grant is administered in coordination with Ramsey County Housing Stability Department, whose staff plays a pivotal role in Heading Home Ramsey (HHR), CoC, leadership, data, and evaluation support staff, and nongovernmental homeless services providers.

## AP-38 Project Summary

### Project Summary Information

<b>1</b>	<b>Project Name</b>	Acquisition Activities
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Remediation of Substandard Properties
	<b>Needs Addressed</b>	Pre-development support, including lead-based pain
	<b>Funding</b>	CDBG: \$300,000
	<b>Description</b>	Funds are requested for the HRA to acquire strategic, hazardous and/or blighted properties for reuse as determined by input and support from the applicable recognized community organizations representing the neighborhood in which the property is located.
	<b>Target Date</b>	12/31/2027
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Funds are requested for the HRA to acquire strategic, hazardous and/or blighted properties for reuse as determined by input and support from the applicable recognized community organizations representing the neighborhood in which the property is located.
	<b>Location Description</b>	Activities are available to eligible properties citywide.
	<b>Planned Activities</b>	Acquisition of vacant, underutilized properties, and related demolition and/or relocation costs. This funding has historically been used for larger development sites. Substandard structures will be cleared, and the sites will be redeveloped.
<b>2</b>	<b>Project Name</b>	Clearance Activities
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Remediation of Substandard Properties
	<b>Needs Addressed</b>	Pre-development support, including lead-based pain
	<b>Funding</b>	CDBG: \$175,000

	<b>Description</b>	Citywide, multi-year program to provides resources to clear buildings are considered nuisance properties, and/or pose a threat to public health and safety. Properties must have been 1) vacant for at least one year; or 2) vacant and unfit for habitation for at least 90 days. These structures are typically identified on the City's vacant building list. The program is administered by City Code Enforcement staff in the Department of Safety and Inspections.
	<b>Target Date</b>	12/31/2027
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This project will have an indirect benefit to neighboring residents.
	<b>Location Description</b>	Activities will be carried out citywide on a spot-by-spot basis.
	<b>Planned Activities</b>	Demolition of vacant buildings considered nuisance properties that pose a threat to public health and/or safety.
<b>3</b>	<b>Project Name</b>	Neighborhood Non-Profits
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public services, including tenant and landlord education
	<b>Funding</b>	CDBG: \$100,000
	<b>Description</b>	Public service activities could include fair housing activities, community engagement, domestic violence prevention, criminal restorative justice, health care, employment training, conflict resolution, and emergency shelter.
	<b>Target Date</b>	12/31/2027
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 1,000 low/moderate income persons will be assisted through programs funded with CDBG.
	<b>Location Description</b>	Activities will be carried out citywide.
	<b>Planned Activities</b>	Assistance to public service programs administered by nonprofit organizations throughout the City. Programs could include services for children, youth, families, senior citizens, domestic violence prevention, citizen participation, conflict resolution, emergency shelter, and community restorative justice.
<b>4</b>	<b>Project Name</b>	Youth Employment
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Youth Employment
	<b>Needs Addressed</b>	Public services, including tenant and landlord education

	<b>Funding</b>	CDBG: \$540,000.00
	<b>Description</b>	This multi-year program provides economically disadvantaged City of Saint Paul youth with educational and employment opportunities. Income-eligible youth are referred to this program by the Saint Paul School District and other community organizations. Services include remedial education, classroom and occupational skills training, and part-time employment.
	<b>Target Date</b>	12/31/2027
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Youth from approximately 250 low/moderate-income families will benefit from employment training and internships.
	<b>Location Description</b>	All City of Saint Paul youth from low- to moderate- income households are eligible to participate.
	<b>Planned Activities</b>	Services income remedial education, classroom and occupational skills training, and part-time employment.
<b>5</b>	<b>Project Name</b>	Housing Construction
	<b>Target Area</b>	RAILROAD ISLAND STRATEGY AREA City-wide
	<b>Goals Supported</b>	Development of New Housing NRSA - Railroad Island/Hamms
	<b>Needs Addressed</b>	Development of new affordable housing
	<b>Funding</b>	CDBG: \$475,000 HOME: \$2,438,169.79
	<b>Description</b>	This project will produce new units of housing either by rehabilitating vacant structures or with new construction activities, both of which may include acquisition, demolition, and relocation.
	<b>Target Date</b>	12/31/2027
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 15 low/moderate-income families will benefit from the investment in newly constructed affordable rental units.
	<b>Location Description</b>	Project sites to be determined.
	<b>Planned Activities</b>	New units of housing either by rehabilitating vacant structures or with new construction activities, both of which may include acquisition, demolition and relocation.
<b>6</b>	<b>Project Name</b>	Single-Unit Rehabilitation
	<b>Target Area</b>	City-wide

	<b>Goals Supported</b>	Homeowner Housing Rehabilitation
	<b>Needs Addressed</b>	Support stable, affordable, and well-maintained ho
	<b>Funding</b>	CDBG: \$1,277,500
	<b>Description</b>	The City and local CDCs administer loan programs that assist low-income households to rehabilitate their homes by addressing CDBG-eligible uses (i.e., building code enforcement, lead paint abatement, hazardous waste treatment, handicap accessibility, energy improvements, and window, roof, and siding replacement, etc.). Funds are also used for emergency repair of water/sewer lines, deficient furnaces, and water heaters.
	<b>Target Date</b>	12/31/2027
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 25 low/moderate-income households will benefit from this activity.
	<b>Location Description</b>	CDBG-eligible households throughout the City are eligible for this activity.
	<b>Planned Activities</b>	Financing to assist income-eligible owner occupants of single-family and duplex properties.
<b>7</b>	<b>Project Name</b>	Multi-unit Rehabilitation
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Rental Housing Rehabilitation
	<b>Needs Addressed</b>	Preservation of existing affordable housing
	<b>Funding</b>	CDBG: \$1,017,500
	<b>Description</b>	Assist in financing the preservation, rehabilitation, or new production of affordable housing. Implement CDBG and HOME eligible activities related to acquisition and related costs (e.g., relocation, demolition, site preparation, and adjacent public improvements), rehabilitation, new construction, and related costs that are part of the total development cost of a housing project.
	<b>Target Date</b>	12/31/2027
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 25 low/moderate-income households will benefit from this activity.
	<b>Location Description</b>	Projects will be selected throughout the city.
	<b>Planned Activities</b>	Financing to assist in the preservation, rehabilitation or new production of affordable housing.
<b>8</b>	<b>Project Name</b>	Commercial Corridor and Citywide Economic Development
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Economic Development
	<b>Needs Addressed</b>	Economic development and job growth

	<b>Funding</b>	CDBG: \$350,000.00
	<b>Description</b>	Activities carried out by the City or its CDC partners to assist businesses with expansion, property acquisition, rehabilitation, energy conservation improvements, leasehold improvements, and development citywide.
	<b>Target Date</b>	12/31/2027
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The activity will assist businesses that either serve low- to moderate-income areas or create jobs for low- to moderate-income persons. It is estimated that 15 businesses will be assisted.
	<b>Location Description</b>	This activity is available to eligible businesses citywide.
	<b>Planned Activities</b>	Activities to assist businesses with expansion, property acquisition, rehabilitation, energy conservation improvements, leasehold improvements, and development citywide.
<b>9</b>	<b>Project Name</b>	Public Facilities Activities
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Public Improvements
	<b>Needs Addressed</b>	Improve public infrastructure, city facilities, an
	<b>Funding</b>	CDBG: \$1,400,000
	<b>Description</b>	Citywide facilities improvements and activities for publicly owned or non profit owned and open to the general public. Activities may include infrastructure improvements; neighborhood facilities such as libraries, parks, and playgrounds; or facilities for persons with special needs such as facilities for people experiencing homelessness.
	<b>Target Date</b>	12/31/2027
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Number of families that will benefit from activities will depend on the specific activities and their service areas.
	<b>Location Description</b>	City-wide
	<b>Planned Activities</b>	Activities include facilities improvements and activities such as infrastructure improvements, neighborhood facilities, or facilities for persons with special needs.
<b>10</b>	<b>Project Name</b>	ESG26SaintPaul
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Homeless Prevention
	<b>Needs Addressed</b>	Emergency shelters, unsheltered prevention and sup

	<b>Funding</b>	ESG: \$ 594,589
	<b>Description</b>	Activities to include homeless prevention, shelter operations, essential services, street outreach, rapid re-housing, and ESG administration. Funding for emergency shelter operations and street outreach will not exceed 60% of ESG funding award and no more than 7.5% for administrative costs. Ramsey County will manage the City's ESG program under the terms of a Joint Powers Agreement.
	<b>Target Date</b>	12/31/2027
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 3,000 individuals and families experiencing homelessness or at risk of homelessness will be assisted.
	<b>Location Description</b>	City-wide
	<b>Planned Activities</b>	Activities include homeless prevention services, emergency shelters operating costs, essential services, street outreach, rapid re-housing, and ESG administration.
<b>11</b>	<b>Project Name</b>	Planning and Administration
	<b>Target Area</b>	City-wide
	<b>Goals Supported</b>	Community Engagement
	<b>Needs Addressed</b>	Community planning needs
	<b>Funding</b>	CDBG: \$1,410,000.00 HOME: \$270,907.75
	<b>Description</b>	Funding for: management, coordination, oversight, and monitoring of the CDBG and HOME programs; costs included in the City's approved Indirect Cost Plan; planning activities in CDBG eligible areas of the City; environmental and historic reviews of HUD funded projects
	<b>Target Date</b>	12/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A Admin
	<b>Location Description</b>	
<b>Planned Activities</b>		
<b>12</b>	<b>Project Name</b>	NRSA Railroad Island/Hamms
	<b>Target Area</b>	RAILROAD ISLAND STRATEGY AREA
	<b>Goals Supported</b>	Development of New Housing

<b>Needs Addressed</b>	Development of new affordable housing
<b>Funding</b>	CDBG: \$5,000.00
<b>Description</b>	Targeted activities related to work done within the boundaries of the Railroad Island/Hamms
<b>Target Date</b>	12/31/2027
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Estimated 2 houses will be constructed within the NRSA
<b>Location Description</b>	Within the Railroad Island NRSA
<b>Planned Activities</b>	New construction homeownership housing

## 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 2026 activities have an address-specific location. All the activities described in the AAP are programs which are available citywide or have service areas that include one or more neighborhoods (districts) in the city. A map showing the areas of the city with at least 51% low/moderate income persons is titled as CDBG-Eligible Census Tracts is in Attachment D. All activities providing an area benefit being carried out in PY 2026-27 will have a service area that is located primarily in a shaded portion of the map, although analysis will occur for each activity.

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

### Geographic Distribution

Target Area	Percentage of Funds
RAILROAD ISLAND STRATEGY AREA	
City-wide	100

Table 7 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

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

### Discussion

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

A portion of CDBG funds will be targeted as appropriate to the Railroad Island/Hamms Neighborhood Revitalization Strategy Area. The ESG funding activities are available citywide and benefit Saint Paul, but as part of CoC resource coordination will include some beneficiaries residing outside of the City of Saint Paul but within the broader CoC area. As the City of Saint Paul includes most people experiencing

homelessness in the broader CoC, the proportion of beneficiaries residing outside of the City is expected to be reasonable, documented as practicable, and will not include a specific percentage of funds that would be targeted.

## Affordable Housing

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

#### Introduction

This section indicates the number of affordable units that are estimated to be provided through HOME and CDBG funding.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	70
Special-Needs	0
Total	70

**Table 8 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	20
Rehab of Existing Units	50
Acquisition of Existing Units	0
Total	70

**Table 9 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

In 2026, the City estimates providing funding for the construction of 15 new affordable rental units through HOME and CDBG. It is estimated that CDBG will fund the construction and/or the acquisition/rehabilitation/resale of 5 homeownership units. The City will continue to fund and work with its non-profit partners for homeowner rehabilitation resulting in an estimated 25 owner-occupied homes rehabilitated – a strategic effort to preserve affordable housing. CDBG funding will also be available for the rehabilitation of an estimated 25 existing affordable rental units.

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

### **Introduction**

The St. Paul Public Housing Agency (SPPHA) is an important provider of affordable housing for thousands of St. Paul households with the greatest need (households at or below 30% of AMI).

SPPHA owns and manages 418 public housing units and 3,836 units with Project-Based Rental Assistance (PBRA) that were converted from public housing via HUD's Rental Assistance Demonstration (RAD) effective January 1, 2020. SPPHA also administers 5,206 Housing Choice Vouchers (as of February 2026). These include 175 Family Unification Program (FUP) vouchers, 318 Mainstream Program/Disability vouchers, 276 Veterans Affairs Supportive Housing (VASH) vouchers and 120 Emergency Housing Vouchers (EHV). SPPHA has allocated 995 project-based vouchers (PBVs); and more than half of those are in supportive housing developments. In total, SPPHA provides nearly 9,500 affordable homes to more than 21,000 people.

The Annual Agency Plan for Federal FY 2026 (PHA's Fiscal Year 2027, beginning April 1, 2026), and the Five-Year Capital Fund Plan are available on the SPPHA website at: <http://www.stpha.org/>.

SPPHA maintained its High Performer status under HUD's Public Housing Assessment System (PHAS) for 32 consecutive years and received a Standard Performer rating for FY 2024 (the most recent rating). SPPHA does not administer HOPE VI activities or Mixed-Finance Modernization and Development. SPPHA has maintained its High Performer status under HUD's Section 8 Management Assessment Program (SEMAP) for 24 consecutive years. SPPHA successfully implements and administers current agreements for Project-Based Vouchers (PBV); including PBV in supportive housing that supports the State of Minnesota, Ramsey County, and the City of St. Paul with their plans to end homelessness.

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

Remaining Public Housing Program – 418 scattered site single family homes and duplexes remain in the public housing program. SPPHA is committed to preserving these homes as safe, affordable, quality housing for low-income families. The current SPPHA Annual Plan notes that SPPHA has applied for asset repositioning via Section 18 Disposition for 360 of these homes to increase funding to preserve and maintain them as deeply affordable housing.

Capital Improvements – SPPHA will use HUD Capital Fund Program funds (for public housing units) and Housing Assistance Payments (HAP) for PBRA units, to renovate and modernize them with emphasis on fire and life safety improvements and sustainable designs to conserve energy and water. SPPHA will continue to seek grants and forgivable loans from Minnesota Housing, Ramsey County, and the City of St. Paul, as well as other sources.

Project-Based Vouchers (PBV) – PBVs awarded by SPPHA subsidize rental units in privately-owned mixed-income, supportive housing and other affordable housing developments, in collaboration with community partners-City, Ramsey County, St. Paul Foundation, and others.

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

- VASH-Assists homeless veterans receiving services from the Veterans Administration
- Mainstream Program - Housing Opportunities for Persons with Disabilities. Assists households that include persons with disabilities, in collaboration with several community social service agencies.
- Family Unification Program Vouchers (FUP) - In collaboration with Ramsey County's Child Protection Unit, helping families secure stable housing and be unified with their children. FUP

also serves 18- to 24-year-olds who have aged out of or left foster care at age 16 or older, who are homeless or at risk of becoming homeless.

- Emergency Housing Vouchers (EHV) – SPPHA received EHV vouchers from HUD in 2021. Working with partner agencies, SPPHA issued the vouchers to individuals and families who are homeless or at risk of homelessness, fleeing domestic violence, etc., in accordance with the requirements in the “American Rescue Plan Act.” These vouchers were not reissued after 9/30/2023 in accordance with HUD guidance regarding EHV turnover.
- Tenant Protection/Preservation Vouchers (TPV) – Prevent displacement of low-income residents when a previously-subsidized rental property is no longer subject to income-restrictions.
- Public Housing Waiting List – The Public Housing waiting list opened for 5-bedroom applicants only on July 21, 2025, and remains open. As of 1/1/2026 there were 1,846 applicants on the public housing waiting list which is for single family homes and duplexes only.
- Multifamily Waiting List – The Multifamily waiting list opened for all bedroom sizes on July 21, 2025, and remains open. As of 1/1/2026 there were 8,244 applicants on the Multifamily/PBRA waiting list for apartments in hi-rises and family townhome developments. Even when this list is closed, SPPHA still accepts applications for 2 programs with special services in multifamily housing: Congregate Housing Services Program (CHSP) and the Wilder Customized Living Services program, both provide services to allow for independent living.
- HCV waiting list – Opened for applications for 1 week in November 2024. By a random computer drawing, 1,200 applicants were placed on the waiting list from 7,700 applications received. As of 1/1/2026, 1,192 applicants remained on the waiting list. When the regular HCV waiting list is closed, clients can still apply for vacancies at some housing projects with PBVs. Those vacancies are offered through the Ramsey County Coordinated entry. SPPHA describes other referral-based applications in the “How to Apply” section for HCVs on the PHA’s website.

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

SPPHA’s Resident Services and Resident Initiatives Departments support Resident Councils in every hi-rise and family housing development. Each Resident Council works to increase resident involvement in their multifamily housing communities and empower residents to take action to achieve personal goals of self-sufficiency. The leaders of the individual Resident Councils meet regularly as the Hi-Rise Presidents Council and the Citywide Residents Council.

Since 1999, the SPPHA Board of Commissioners has established SPPHA’s Resident Advisory Board (RAB) with membership to be comprised of:

- Section 8 representatives who volunteered for the RAB in response to mailings and flyers.
- Resident representatives from SPPHA’s Public Housing scattered site single family homes and duplexes.
- RAB membership changes due to residents moving out of public housing or leaving the Section 8 program, etc. RAB meeting agendas are sent to all residents of public housing and a random selection of Section 8 participants.

SPPHA actively encourages discussions about planning capital improvements and SPPHA policies. During the year, SPPHA Senior Management meets with members of the RAB to discuss any significant SPPHA policy changes, the SPPHA Annual Plan, and SPPHA Capital Improvements. Additionally, SPPHA’s Resident Initiatives Department and Resident Councils work together to form new partnerships with community and supportive service agencies.

Section 3 - SPPHA provides economic opportunities for low-income residents, to the greatest extent feasible, by hiring qualified Section 3 SPPHA residents, contracting with Section 3 businesses, and including Section 3 requirements in all contracts. SPPHA's Resident Initiatives Department also identifies resources and services to provide Section 3-related education and training to public housing residents. Family Self-sufficiency Program (FSS) is a SPPHA resident initiative which includes collaborations to encourage resident economic development and self-sufficiency.

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

Not applicable.

In 2024 (the last year for which SPPHA has received a score), SPPHA earned HUD's Standard Performer rating under HUD's Public Housing Assessment System (PHAS). SPPHA has maintained HUD High Performer status under HUD's Section 8 Management Assessment Program (SEMAP) for 24 years.

**Discussion**

SPPHA has achieved High or Standard Performer status continuously for both its public housing and Section 8 Housing Choice Voucher Program.

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

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

### **Introduction**

Those most at risk of homelessness are youth, older adults, and veterans. The region sees large and persistent racial disparities, with African Americans 8.7 times, Native Americans 14.5 times, and Latinx 2 times as likely to experience homelessness than white residents. The city also sees a high rate of new immigrants in the unsheltered population. The primary causes of homelessness are a lack of affordable housing and living wage jobs with low barriers to entry, chronic health and mental health issues, and the ripple effects caused by discrimination in housing and other systemic factors that add barriers for many residents. In the 2023 Point in Time (PIT) count, the largest population increases included homeless families and homeless Asian families in particular.

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

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

A variety of housing options, ranging from independent living to housing with supportive services, are available for residents with special needs. Services for the elderly, frail elderly, and persons with disabilities include independent living programs, the City's Home Rehab Programs, Minnesota Homeownership Center's (MNHOC) Mortgage Counseling, Americans with Disabilities Act (ADA)-designed housing, congregate living and assisted living facilities, nursing facilities, State of Minnesota, ARC Minnesota, HUD Section 811 Program for persons with disabilities, and the Block Nurse Program. Services for public housing residents with special needs include Saint Paul Public Housing Agency's (PHA's) Assisted Living Programs (Wilder ALP and CHSP), PHA/Accessible Space New Beginnings - Brain Injury Program. And for residents with HIV/AIDS and their families, PHA/Accessible Space, Inc. provides housing and services. The City of Minneapolis manages Housing Opportunities for Persons with AIDS (HOPWA) for Saint Paul, and the Minnesota AIDS Project helps families obtain/maintain housing.

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

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

options.

In 2022, the CoC developed a new Prevention and Tenant Stability workgroup. The workgroup has undergone a multi-month gaps analysis process and has the following recommendations: 1) Work closely with the county's Emergency Assistance (EA) department and other prevention resources such as FHPAP programming to break down silos and make rental assistance more expeditious; 2) Bring on more landlords; and 3) Develop centralized websites and dashboards- streamlining all prevention resources.

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

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

All ESG and HUD-funded program staff are trained in conducting CES assessments and the HMIS intake process. At the program-level, for both ESG and other HUD-funded programs, there is a requirement for specific documentation (per project and funding type) that must be included in a client's file: initial intake, eligibility forms, income verification, housing barriers matrix, housing stabilization plan, exit forms, etc. It is through this process that people experiencing homelessness and their providers can determine the best path to resources (health care, financial services, employment, support services, housing, etc.) to resolve the housing crisis and establish the necessary services to promote self-sufficiency and housing stability. For example, a system gap identified in the 2020 and 2021 HHR Needs Assessment was the need for an outreach program specifically for families. Through City ESG funding, Ramsey County contracted with a provider to operate an outreach program specifically for this activity. The service needs for families are far different from those of other subpopulations of the homeless, and a dedicated family-specific outreach program was the best approach to meet the needs of marginalized families within the community.

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

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

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

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

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

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

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

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

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

Providers within the CoC, community service partners such as the Minnesota Assistance Council for Veterans, public service partners such as Ramsey County, Metro Transit HAT, and Saint Paul Public Schools (SPPS) work collaboratively to serve the needs of chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth.

Within the ESG-funded street outreach, emergency shelter, and homeless prevention programs, assessors are trained to facilitate a client's transition from homelessness to permanent housing. Permanent housing options may include rapid re-housing (RRH), permanent supportive housing (PSH), other permanent housing, and private/market rental housing. The City's St. Paul Residence provides permanent supportive housing for those with late-stage chronic alcoholism and for long-term homeless residents using the Housing First Model.

From recent 2024 data, there were 2,255 Ramsey County households on the CES Waitlist. These are clients who have been assessed and are waiting for a housing referral based on the needs identified

during assessment. There were also 223 individuals and heads of families on the CES referral list. This reflects the clients with pending housing referrals, acknowledgement of referrals received by housing providers, and outcomes of each referral.

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

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

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

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

The City's Emergency Rental assistance will provide up to a month of rent assistance or \$2,500 to households with verifiable emergency needs due to a pending eviction when other services or funds are unavailable.

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

Public Health Department and MCC, HouseCalls combines the breadth of a public agency with the flexibility of a nonprofit to meet the needs of people at-risk of homelessness. Ramsey County's FHPAP program also funds 5 other eviction prevention programs throughout the city and metro; the largest program includes eviction prevention within Housing Court that is a partnership between Ramsey County, Neighborhood House, and Legal Aid.

Face to Face – Homeless Prevention: The target population is unaccompanied youth aged 18-24 who are at-risk of homelessness. Overall program demographics are youth of color, 15% have a long-term disability, nearly a third have children, and many have been in foster care or have experienced domestic

violence. The program provides both short-term and medium-term rental assistance based on individual need. Ongoing case management is provided to support employment, navigate insurance, WIC, achieve personal goals, and help youth find and retain permanent housing. Prevention assistance advances outcomes - reducing both the number of overall homeless youth and the number who may become homeless for the first time.

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

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

## **Discussion**

The City will continue its collaboration with Ramsey County CoC and social service organizations to coordinate resources across the CoC area. This collaboration is essential to addressing the needs of homeless and those at risk of being homeless, as well as providing housing and supportive services for non-homeless special needs persons. Coordinating funding across the CoC area is beneficial to Saint Paul residents and meets the priority needs identified in this plan for homeless prevention, RRH and emergency shelters, and transitional housing. The CoC completes a federally required annual Point-in-Time (PIT) Count. The PIT, done by staff and volunteers, is a count of sheltered and unsheltered people experiencing homelessness on a single night in January. The purpose is to get a snapshot of the state of homelessness by counting every person experiencing homelessness. The most recent PIT count was in January 2026. Other means used to determine the number of homeless and identify the areas of greatest need: Wilder Research, HHR 7 Community Measures, and CES dashboards.

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

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

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

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

### **Introduction:**

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

The most significant barriers for households securing affordable housing units are insufficient income and the lack of affordable housing units. The greatest gap in affordable housing units is for households with income below 30% AMI. Not only is the supply of units few, but many of the units are occupied by households that could afford a unit at a higher rent. Barriers for developing affordable housing include high construction costs, lack of resources and available land in a built-up city. While some of the barriers to producing affordable housing are beyond the control of local government, local policies like regulatory codes, fees, and zoning regulations may hinder the development of or increase the cost of housing.

From a financing perspective, affordable housing development requires multiple funding sources including the City local funds, TIF, LIHTC, State dollars, federal funding from HUD (CDBG, HOME), and redevelopment property acquired and assembled by public entities. To keep pace with increasing demand for affordable housing and to balance development to ensure locational choice, continued federal and state funding is needed. The lack of sufficient funding has negative bearing on the City's ability to provide and invest in affordable housing. The City receives only about 36% of the CDBG funding it received in 1975. Similarly, the City receives about 75% of the HOME funding it received in 2000.

### **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**

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

Over the last five years, Saint Paul has amended its zoning code to support housing development and reduce barriers to affordable housing. In 2021, the City eliminated zoning requirements for off-street parking, which can increase the cost of development. City Council passed Ordinance 23-43 which eliminated single-family-only zoning districts and updated zoning regulations to reduce barriers to allow increased housing density and diversify housing options. It also incentivized providing rental units affordable at 60% of AMI, ownership units at 80% of AMI, units with three or more bedrooms, and

preserving existing residential structures. The City will continue to remove barriers to housing development through updates to the zoning code and develop resources, including a “new development toolkit” and pre-approved plans to help facilitate the building process.

In November 2021, Saint Paul voters approved a rent stabilization ordinance to limit rent increases within a 12-month period to 3%. In a city where more than 50% of the residents are renters, the purpose of the ordinance is to keep or create new affordable rental housing particularly for lower income households and those on a fixed income. This ordinance continues to be monitored and calibrated to adapt to market conditions.

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

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

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

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

**Discussion:**

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

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

### **Introduction:**

This section identifies additional actions required as part of the Annual Action Plan.

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

In 2026, the City will address many of its underserved needs through activities of ongoing, multi-year HUD funded housing programs, primarily new construction or preservation of large family units, and units for very low- and extremely low-income households. City and its partners using CDBG and HOME program funding, LIHTCs, TIF, local funds, and the City's Housing Trust Fund through various homeowner, homebuyer, multi-unit, and new housing development programs will meet the need. The City's ESG grant is administered in coordination with Ramsey County Housing Stability Department, whose staff plays a pivotal role in Heading Home Ramsey (HHR), CoC, leadership, data, and evaluation support staff, and nongovernmental homeless services providers.

The City Homeless Assistance Response Team (HART) is a service-based street outreach approach to strategically address the needs of those experiencing homelessness. In coordination with Ramsey County and service providers, HART aligns City and County resources to ensure that every individual can be connected to services. The program includes a new response strategy to receiving calls and managing encampments and increased coordination among service agencies to provide assessments, support, and resources. The City, County, and partner organizations continue to look for better ways to work collaboratively and efficiently and align strategies to comprehensively approach outreach and service gaps.

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

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

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

In 2026, the City will continue to use the majority of its CDBG funding and all its HOME funding for affordable housing activities. In addition to the HUD-funded activities, the City will carry out housing development in conjunction with Minnesota Housing Finance Agency (MHFA), Metropolitan Council, Family Housing Fund, the Minnesota Department of Employment and Economic Development (DEED), the Minnesota Management and Budget Office (MMB), Saint Paul HRA, as well as private partners. The City will use the 60 percent tax credit rent for determining affordable rents for rental housing that is assisted with CDBG funding. HOME assisted developments will use the established HOME rents.

Saint Paul voters approved a Residential Rent Stabilization ordinance in 2021 which took effect in May 2022 and modifications in effect January 2023. The rent-control ordinance limits rent increases within a 12-month period to 3% of the existing monthly rent, with a few exceptions, including for housing that is

affordable. With more than 50% of residents as renters, the purpose of the ordinance is to retain or create new affordable rental housing particularly for lower income households and those on a fixed income. This ordinance is being evaluated.

The City's Low-Income Housing Tax Credit (LIHTC) selection process also encourages a more even distribution of affordable housing citywide. The City's HTF funding will be combined with existing City and federal resources for investment in creating housing affordability, preserving existing affordable units for both renters and homeowners, pursuing innovative housing stability strategies and establishing protections for renters and owners vulnerable to housing instability. City HRA amended its scoring structure for LIHTC applicants to provide added points to projects that provide housing targeted to residents earning no more than 30% AMI. The City also amended the Qualified Allocation Plan for Housing Tax Credit Projects to allow projects located in Downtown to apply for a qualified contract after the first 15-year affordability period, with the goals of leveraging more private investment and expand our tax base.

In addition, Emergency Rental Assistance will provide up to \$2,500 to households with verifiable emergency needs due to a pending eviction when other services or funds are unavailable. The Downpayment Assistance and the Inheritance Programs for low- and moderate-income homebuyers and homeowners will continue, with opportunities to build and retain wealth through homeownership.

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

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

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

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

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

Other initiatives include Full Stack, a public-private collaboration with a renewed focus on using the power of tech and innovation to leverage equitable, sustainable, resilient economic development in Saint Paul; the Minimum Wage Ordinance, which sets a minimum wage of \$15 an hour by 2027; the

Saint Paul Office of Financial Empowerment (OFE) which is working deliberately to help a new generation of Saint Paul residents repair generational injustices and build economic power through college savings, guaranteed income, the Medical Debt Reset Initiative, and the LOCAL Fund (uses shared ownership models, recovery of vacant and abandoned properties, and community wealth-building); and Open for Business, for start-up and existing businesses to get information and leverage resources.

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

Saint Paul's institutional structure gives the City the opportunity to partner with many organizations. In 2026, the City of Saint Paul Department of Planning and Economic Development (PED) will again work with other City departments, as well as other levels of government (county, state, federal), non-profit organizations, and private sector developers to plan and implement housing, economic development, and community development investments.

City Council passed Ordinance 23-43 which eliminated single-family-only zoning districts and updated zoning regulations to reduce barriers to allow increased housing density, diversify housing options, and incentivize providing rental units affordable at 60% of AMI, ownership units at 80% of AMI, units with three or more bedrooms, and for retaining an existing residential structure. The City will continue to remove barriers to housing development through updates to the zoning code and develop resources, including a "new development toolkit" and pre-approved to help facilitate the building process.

City Council passed Ordinance 22-3 to expand the definitions for religious institution and community center to permit the most wanted and needed uses at these sites. Also included was an expanded definition of day care/preschool to allow for activities at existing and former religious sites; emergency housing at religious institutions with no zoning limits; overnight shelter at religious institutions for up to 25 adults; and homeless services at religious institutions subject to same regulations elsewhere. These changes establish a better process for land use applications for religious organizations and community centers.

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

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

Saint Paul will continue to coordinate services with Ramsey County (the primary public service provider), and the Saint Paul Public Housing Agency (administrator of public housing and vouchers in Saint Paul) in 2026. The City through the FHIC will work with metro-wide governmental jurisdictions to affirmatively further fair housing regionally in the Twin Cities Metro Area.

The City and County are partnering closely on strategies and investments to address housing instability across the housing continuum, to provide supports to residents experiencing homelessness, and ensure that residents receive coordinated social services. This agreement between the City and County

suballocating City ESG dollars helps to achieve stronger coordination of shelter, street outreach and social services provided to Saint Paul residents by Ramsey County.

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

The public/private partnership to build the new Dorothy Day Center, Higher Ground and an Opportunity Center to provide permanent supportive housing, connection with community service providers, a medical respite program, and coordination among institutional private health care providers and public health care providers, such as Health Care for the Homeless. City economic development programs provide gap financing, which requires businesses seeking assistance to secure other public and private financing from banks, the state, Metropolitan Council, private foundations, personal capital, CDCs, and other lenders. This coordination ensures that funds leveraged are maximized and HUD-funding utilized where most needed. As a partner in workforce development through a Joint Powers Agreement with Ramsey County that establishes a joint Workforce Innovation Board (WIB), Saint Paul is regularly partnering with Ramsey County on training programs and wrap around social services for residents. The WIB is comprised of 50% business representatives, ensuring collaboration with employers. Through sector-based approaches, Saint Paul has entered into regional partnerships for job skills credentialing programs and provided scholarships to low-income residents using City funds.

#### **Discussion:**

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

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

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

access to opportunity as defined by HUD.

## Program Specific Requirements

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

#### Introduction:

The City estimates similar funding to 2025 for this program year: \$6,756,518.00 in CDBG funding, \$1,423,385.52 in HOME funding, and \$594,589.00 in ESG funding. In addition, the City estimates using about \$293,482 in CDBG program income and approximately \$561,006 in HOME program income. Program income is income directly generated from a CDBG or HOME program funded activity, such as loan repayments. Because the federal budget allocations for 2026 were not made available while drafting this Action Plan, the City has a contingency plan for different funding amounts. Should the City receive an amount higher or lower than the estimates from last program year, all activities may be adjusted in direct proportion to the difference in actual allocations and Program Income may be re-evaluated.

A consecutive period of three years, 2025, 2026 and 2027, is being used to determine that the minimum overall benefit of 70 percent of CDBG funds is used to benefit persons of low- and moderate-income. The City of Saint Paul will allow, but not require, owners of HOME-funded housing developments to limit the beneficiaries or give preferences to a segment of the low-income population. This includes limiting units or giving preferences to the following low-income population segments: elderly and/or disabled, victims of domestic violence, and chronically homeless.

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

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

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	293,482
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>293,482</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
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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.

0.00%

### **HOME Investment Partnership Program (HOME)**

#### **Reference 24 CFR 91.220(l)(2)**

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

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

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

The City of Saint Paul does not have a HOME Program Resale/Recapture Policy for 2026, and is working on developing the policy.

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

The City of Saint Paul does not have a HOME Program Resale/Recapture Policy for 2026, and is working on developing the Policy.

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

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

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

Not applicable.

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

Not applicable.

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

Preferences may be utilized to support elderly and/or disabled, victims of domestic violence, and chronically homeless.

### **Emergency Solutions Grant (ESG)**

#### **Reference 91.220(l)(4)**

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

The ESG Program Manual was developed in partnership with Ramsey County to provide written standards for the program, see Attachment E.

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

Coordinated Entry is the process to access supportive housing for individuals and families experiencing homelessness. Supportive housing resources are extremely limited. Because of this, individuals and families with the highest vulnerability, most significant service needs, and longest history of homelessness are prioritized. Housing is not guaranteed through this process. To be eligible for a housing assessment in Ramsey County and within the City of Saint Paul, households must meet one of the following homeless definitions: a) HUD Homeless - staying in shelter, outside, or in other places not meant for human habitation; exiting an institution where person/household resided for 90 days or less and who resided in shelter or other place not meant for human habitation prior to entering the institution; and/or fleeing or attempting to flee domestic violence; b) Long Term Homeless (LTH) - lacking a permanent place to live continuously for a year or more or at least four times in the past three years. Time spent in institutional care or correctional facility (if

longer than 90 days) shall be considered "excluded time" and does not count toward length of time a household has been homeless. Episodes of homelessness can include time doubled-up or couch-hopping. Doubled-up or couch-hopping is considered homeless if that arrangement has persisted less than 12 months; c) For Youth (ages 24 and younger) ONLY: Minnesota Homeless - any unaccompanied youth or youth aged heads of households that is without a permanent place to live that is fit for human habitation.

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

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

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

The County and CoC through ongoing meetings, monitoring, data collection, evaluations, recruitment of persons with lived experience of homelessness and in consultation with services providers, collects information to address policy and funding decisions for improvements to ESG funded activities, facilities and services. The CoC Ranking Committee includes two active individuals who have experienced homelessness.

5. Describe performance standards for evaluating ESG.

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

2026-27  
Action Plan Attachments



June 30, 2025

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

From: Lauren Dees-Erickson, Chair and Demetrius Shaw, Vice Chair

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

Dear Honorable Mayor Carter,

Thank you for the opportunity to submit the Saint Paul Capital Improvement Budget Committee (CIB) recommendations for the 2026 Capital Improvement Budgets.

As a committee we represent every ward of Saint Paul and are committed to ensuring community voices support the city in being positive stewards of Saint Paul's CIB spending. We have remained committed to ensuring community voices are elevated in support of spending that champions equitable expenditures across all wards, strategic investments that align with community needs and city department 5-year plans. All of our recommendations are made to support fiscal responsibility and with an eye towards maintaining Saint Paul's infrastructure. The CIB committee is disappointed and discouraged by the process followed this year to review the non CDBG and CIB bond projects. The goal for next year is to review all projects and to be granted a minimum of 2 months for a comprehensive review of all projects that the committee is expected to recommend. We also ask that public hearings and their focus be tied to the information the CIB has received in the 2-month review timeline.

The overall Capital Improvement Budget for 2026 includes approximately \$174.6 million in funding. This includes \$4,000,000 in Community Development Block Grant (CDBG), \$3,916,000 Capital Improvement Bonds and \$13,576,000 total Municipal State Aid (MSA) funding. In advance of the committee making the attached recommendations, we have dedicated extensive time and attention to review, seek clarification and discuss all community and department process proposals. The recommendations that we are making are inclusive of community inputs.

The Mayor's office is the final decision maker on how CIB funding is allocated, however, we urge you to apply the committee's Capital Improvement Bond and Community Development Block Grant recommendations in full, without changes, in recognition of the extensive work the committee engaged in during the last year.

As a committee we reviewed 17 proposals for Community Development Block Grant funding, of these 2 were new applicants. And for the Department Process the committee reviewed 45 proposals from a total of 6 City departments. We held a public hearing and CDBG proposal applicants had an opportunity to present their proposals to the committee.

As individuals, committee members reached out to their representative District Councils in order to engage the public around the 2027 Department Proposal Survey which allowed community members to rank department proposals. 381 community members participated in the survey. We commend the city for their work to engage the public as the outcome of the community survey aligned with the rankings of the CIB committee.

In our letter to you last year we noted a need to recommit to promoting budget decisions and processes which reflect our commitment to equity. The members of the CIB Committee were concerned that we were not meeting the goal of equity and inclusion. This was reflected in our Community Proposal process. In 2024 the initial call for Community Proposals resulted in a pool of proposals which were not representative of the city and did not include eligible opportunities for investments in Wards 5 or 7. This year we have seen marked improvement in our processes. We worked in partnership with Wilder Research, who the City Council Audit committee engaged to review the CIB committee's Community Proposal process. CIB members answered questions and reviewed findings. We hope to implement some of the recommendations during the community proposal process set to commence in 2026.

## Attachment A - CIB Recommendations and Comments



### CITY OF SAINT PAUL LONG-RANGE CAPITAL IMPROVEMENT BUDGET COMMITTEE OFFICE OF FINANCIAL SERVICES

15 Kellogg Blvd. West, 700 City Hall  
Saint Paul, MN 55102  
Tel: 651-266-8800 | Fax: 651-266-8541

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The CIB committee was happy with the close coordination the committee had with the city during the Department Process. For the upcoming year our goal is to continue to streamline the community proposal processes, in particular decreasing barriers to participation. We are also committed towards working with city staff to achieve greater transparency in how we track CIB budget expenditures year over year.

The committee does note that during the Department process and CDBG process the CIB committee faced constraints to respond to limited funding available to allocate to larger scale project requests. It seems like providing a mechanism to fund larger scale projects is needed and cannot be addressed within the current capital improvement bond annual budget.

As always, the committee appreciates the dedication of you and city staff (Nichelle Bottko Woods and Shannon Forney) in support of CIB work. It is a pleasure to serve our city and its residents.

Lauren Dees-Erickson, CIB Committee Chair  
Demetrius Shaw, CIB Committee Vice-Chair  
Nardos Ashenafi  
Jessica Braun  
Makayla Cox  
April Eh  
Raymond Hess  
Brian Jackson  
Carl Johnson  
Tim Marino  
Pat McQuillan  
Liam O'Brien  
Darren Tobolt  
Pang Yang

**Attachment A - CIB Recommendations and Comments**  
**2026 - 2027 Capital Improvement Committee Tentative Recommendations**

**All Projects List**

Sorted by Funding Source

Program by Funding Type	Department Requests		CIB Committee	
	2026 Requested	2027 Requested	2026	2027
	Recommended	Recommended	Recommended	Recommended
<b>Federal Grants and Aids</b>	<b>\$ 8,440,000</b>	<b>\$ 18,159,240</b>	<b>\$ 6,200,000</b>	<b>\$ 16,894,240</b>
<b>Community Development Block Grant</b>	<b>\$ 6,240,000</b>	<b>\$ 5,265,000</b>	<b>\$ 4,000,000</b>	<b>\$ 4,000,000</b>
Saint Paul Home Repair Loan Fund	\$ 600,000	\$ 600,000	\$ 85,000	\$ 185,000
10 Home Restorations in St Paul	\$ 10,000	\$ 10,000	\$ 10,000	\$ 10,000
Accessibility and Safety Upgrades for NeDA Facilities	\$ 750,000	\$ 750,000	\$ -	\$ -
Acquisition Fund for Community Investment	\$ 300,000	\$ 300,000	\$ 300,000	\$ 300,000
Baker Park Play Area	\$ -	\$ 650,000	\$ -	\$ 650,000
Boost	\$ 800,000	\$ -	\$ -	\$ -
Business Investment Fund	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000
Citywide 30% AMI Housing Program	\$ 300,000	\$ 300,000	\$ 300,000	\$ 300,000
Conway Park Play Area	\$ 650,000	\$ -	\$ 650,000	\$ -
East Side Home Improvement Revolving Loan Fund	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000
East Side Homeownership Initiative	\$ 480,000	\$ 480,000	\$ 480,000	\$ 480,000
Hmong Community Center	\$ 175,000	\$ -	\$ 100,000	\$ -
Housing Real Estate Multi-Unit Development Fund	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000
North End Economic Development Business Investment Fund	\$ 100,000	\$ 100,000	\$ -	\$ -
Ryan Park Play Area	\$ 650,000	\$ -	\$ 650,000	\$ -
Vacant & Hazardous Building Demolition	\$ 175,000	\$ 175,000	\$ 175,000	\$ 175,000
West Minnehaha Play Area	\$ -	\$ 650,000	\$ -	\$ 650,000
<b>Federal Discretionary</b>	<b>\$ 2,200,000</b>	<b>\$ 12,894,240</b>	<b>\$ 2,200,000</b>	<b>\$ 12,894,240</b>
Maryland Ave Traffic Signal Enhancements	\$ -	\$ 2,332,000	\$ -	\$ 2,332,000
Minnehaha - Payne to E7th	\$ -	\$ 5,224,640	\$ -	\$ 5,224,640
Payne Pedestrian Improvements	\$ 1,200,000	\$ -	\$ 1,200,000	\$ -
Safe Routes to School: Chelsea Heights	\$ 1,000,000	\$ -	\$ 1,000,000	\$ -
Wabasha - 7th to 11th	\$ -	\$ 5,337,600	\$ -	\$ 5,337,600
<b>Local: General Obligation Bonds</b>	<b>\$ 22,541,919</b>	<b>\$ 55,761,900</b>	<b>\$ 22,541,919</b>	<b>\$ 29,725,900</b>
<b>Capital Improvement Bonds</b>	<b>\$ 3,916,000</b>	<b>\$ 37,036,000</b>	<b>\$ 3,916,000</b>	<b>\$ 11,000,000</b>
Asphalt Restoration and Replacement Program*	\$ 250,000	\$ 250,000	\$ 250,000	\$ 250,000
Battle Creek Park Play Area Renovation	\$ -	\$ 650,000	\$ -	\$ -
Children's Play Area Improvements*	\$ -	\$ 251,000	\$ -	\$ 251,000
CIB Bond Sale Costs*	\$ 130,000	\$ 130,000	\$ 130,000	\$ 130,000
CIB Contingency*	\$ 150,000	\$ 150,000	\$ 150,000	\$ 150,000
Citywide Long-Term Capital Maintenance Program*	\$ 1,500,000	\$ 1,500,000	\$ 1,500,000	\$ 1,500,000
Citywide Stairway Repair and Replacement Program*	\$ 250,000	\$ 250,000	\$ -	\$ -
Citywide Tree Planting Program*	\$ 330,000	\$ 300,000	\$ 330,000	\$ 300,000
Community Proposals*	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000
Dousman Play Area Renovation	\$ -	\$ 400,000	\$ -	\$ -
Hayden Heights Library Renovation	\$ -	\$ 3,550,000	\$ -	\$ 3,550,000
Highland National Golf Course Structural Building Replacement	\$ -	\$ 2,000,000	\$ -	\$ -
Highland Park Aquatic Center - Children's Activity Pool Improvements	\$ -	\$ 800,000	\$ -	\$ -
McMurry Field Renovation	\$ -	\$ 2,000,000	\$ -	\$ -
Mears Park Renovation	\$ -	\$ 2,500,000	\$ -	\$ -
New Central District Police Building	\$ -	\$ 2,000,000	\$ -	\$ -
Outdoor Court Restoration Program*	\$ 236,000	\$ 250,000	\$ 236,000	\$ 250,000
Park and Library Capital Asset Revitalization*	\$ 200,000	\$ 200,000	\$ 200,000	\$ 200,000
Parks Grant Prep/Preliminary Design Program*	\$ 20,000	\$ 20,000	\$ 20,000	\$ 20,000
Pedestrian and Traffic Safety Program*	\$ 225,000	\$ 250,000	\$ 225,000	\$ 250,000
Railroad Crossing Safety Improvements Program*	\$ 10,000	\$ 10,000	\$ -	\$ -
Randolph Avenue Bridge	\$ -	\$ 3,000,000	\$ 260,000	\$ 2,740,000
Replace Fire Station 20	\$ -	\$ 500,000	\$ -	\$ -
Riverview Library Renovation	\$ -	\$ 10,000,000	\$ -	\$ 784,000
Saint Paul Police Impound Lot Relocation	\$ -	\$ 5,450,000	\$ -	\$ -
Signalized Intersection Safety Improvements Program*	\$ 115,000	\$ 125,000	\$ 115,000	\$ 125,000
<b>CIB Bond Interest Earnings</b>	<b>\$ 269,319</b>	<b>\$ 269,319</b>	<b>\$ 269,319</b>	<b>\$ 269,319</b>
Transfers to Debt Service Fund*	\$ 269,319	\$ 269,319	\$ 269,319	\$ 269,319
<b>General Obligation Capital Notes</b>	<b>\$ 2,856,600</b>	<b>\$ 2,956,581</b>	<b>\$ 2,856,600</b>	<b>\$ 2,956,581</b>
Fire Vehicles*	\$ 1,547,325	\$ 1,601,481	\$ 1,547,325	\$ 1,601,481
Police Vehicles*	\$ 1,309,275	\$ 1,355,100	\$ 1,309,275	\$ 1,355,100
<b>Street Reconstruction Bonds</b>	<b>\$ 15,500,000</b>	<b>\$ 15,500,000</b>	<b>\$ 15,500,000</b>	<b>\$ 15,500,000</b>
Saint Paul Streets Paving Program*	\$ 15,500,000	\$ 15,500,000	\$ 15,500,000	\$ 15,500,000

\*Annual Program

Shading reflects change from requested to tentatively recommended budgets

**Attachment A - CIB Recommendations and Comments**  
**2026 - 2027 Capital Improvement Committee Tentative Recommendations**

**All Projects List**

Sorted by Funding Source

Program by Funding Type	Department Requests		CIB Committee	
	2026 Requested	2027 Requested	2026 Recommended	2027 Recommended
<b>Local: Other Financing Sources</b>	<b>\$ 131,003,875</b>	<b>\$ 75,258,000</b>	<b>\$ 131,003,875</b>	<b>\$ 75,258,000</b>
<b>Assessments</b>	<b>\$ 3,700,000</b>	<b>\$ 3,970,000</b>	<b>\$ 3,700,000</b>	<b>\$ 3,970,000</b>
Arlington - Jackson to Payne	\$ -	\$ 1,890,000	\$ -	\$ 1,890,000
Earl - Minnehaha to Burns	\$ -	\$ 1,880,000	\$ -	\$ 1,880,000
Earl- Maryland to Minnehaha	\$ 1,600,000	\$ -	\$ 1,600,000	\$ -
Local Street, Alley, Sewer and Lighting Program*	\$ 150,000	\$ 150,000	\$ 150,000	\$ 150,000
Pelham - Franklin to MRB	\$ 1,900,000	\$ -	\$ 1,900,000	\$ -
Sidewalk Reconstruction Program*	\$ 50,000	\$ 50,000	\$ 50,000	\$ 50,000
<b>City 1% Sales Tax Projects**</b>	<b>\$ 72,566,875</b>	<b>\$ 25,260,000</b>	<b>\$ 72,566,875</b>	<b>\$ 25,260,000</b>
Arlington - Jackson to Payne	\$ 2,720,000	\$ 12,770,000	\$ 2,720,000	\$ 12,770,000
Arlington - Wheelock to Jackson	\$ 2,820,000	\$ -	\$ 2,820,000	\$ -
Athletic Complex Design	\$ 200,000	\$ -	\$ 200,000	\$ -
Como Geothermal - Trio (Phase I)	\$ 500,000	\$ -	\$ 500,000	\$ -
Downtown Park Improvements	\$ 1,600,000	\$ -	\$ 1,600,000	\$ -
Earl - Minnehaha to Burns	\$ 2,640,000	\$ 12,490,000	\$ 2,640,000	\$ 12,490,000
Earl- Maryland to Minnehaha	\$ 11,740,000	\$ -	\$ 11,740,000	\$ -
Eastside Community Center Design	\$ 200,000	\$ -	\$ 200,000	\$ -
Hillcrest Design	\$ 100,000	\$ -	\$ 100,000	\$ -
Maryland - Como to Dale	\$ 1,240,000	\$ -	\$ 1,240,000	\$ -
Pelham - Franklin to MRB	\$ 14,350,000	\$ -	\$ 14,350,000	\$ -
Revitalize Asphalt	\$ 5,425,000	\$ -	\$ 5,425,000	\$ -
Revitalize Buildings & Parks	\$ 9,600,000	\$ -	\$ 9,600,000	\$ -
Revitalize Courts	\$ 1,080,000	\$ -	\$ 1,080,000	\$ -
Revitalize Fields	\$ 9,110,000	\$ -	\$ 9,110,000	\$ -
Revitalize Play Areas	\$ 2,221,875	\$ -	\$ 2,221,875	\$ -
Revitalize Water Features	\$ 3,050,000	\$ -	\$ 3,050,000	\$ -
River Balcony Design	\$ 200,000	\$ -	\$ 200,000	\$ -
River Learning Center Design	\$ 200,000	\$ -	\$ 200,000	\$ -
Summit- Mississippi River Blvd to Fairview	\$ 3,570,000	\$ -	\$ 3,570,000	\$ -
<b>City 1% Sales Tax Revenue**</b>	<b>\$ 46,000,000</b>	<b>\$ 41,791,000</b>	<b>\$ 46,000,000</b>	<b>\$ 41,791,000</b>
City 1% Sales Tax Parks**	\$ 11,500,000	\$ 10,455,000	\$ 11,500,000	\$ 10,455,000
City 1% Sales Tax Public Works**	\$ 34,500,000	\$ 31,336,000	\$ 34,500,000	\$ 31,336,000
<b>Private Utility Financing</b>	<b>\$ 20,000</b>	<b>\$ 20,000</b>	<b>\$ 20,000</b>	<b>\$ 20,000</b>
Saint Paul Streets Paving Program*	\$ 20,000	\$ 20,000	\$ 20,000	\$ 20,000
<b>Public Improvement Aid</b>	<b>\$ 60,000</b>	<b>\$ 60,000</b>	<b>\$ 60,000</b>	<b>\$ 60,000</b>
Parks Grant Prep/Preliminary Design Program*	\$ 30,000	\$ 30,000	\$ 30,000	\$ 30,000
Real Estate Division Design Services*	\$ 30,000	\$ 30,000	\$ 30,000	\$ 30,000
<b>Ramsey County</b>	<b>\$ 1,000,000</b>	<b>\$ -</b>	<b>\$ 1,000,000</b>	<b>\$ -</b>
Randolph and Lexington Sidewalk Repair	\$ 1,000,000	\$ -	\$ 1,000,000	\$ -
<b>Saint Paul Water Utility</b>	<b>\$ 2,500,000</b>	<b>\$ 1,400,000</b>	<b>\$ 2,500,000</b>	<b>\$ 1,400,000</b>
Pelham - Franklin to MRB	\$ 1,100,000	\$ -	\$ 1,100,000	\$ -
Saint Paul Streets Paving Program*	\$ 1,400,000	\$ 1,400,000	\$ 1,400,000	\$ 1,400,000
<b>Sewer Utility Fund</b>	<b>\$ 3,100,000</b>	<b>\$ 1,100,000</b>	<b>\$ 3,100,000</b>	<b>\$ 1,100,000</b>
Earl- Maryland to Minnehaha	\$ 900,000	\$ -	\$ 900,000	\$ -
Pelham - Franklin to MRB	\$ 1,100,000	\$ -	\$ 1,100,000	\$ -
Saint Paul Streets Paving Program*	\$ 1,100,000	\$ 1,100,000	\$ 1,100,000	\$ 1,100,000
<b>Street Maintenance Program</b>	<b>\$ 1,485,000</b>	<b>\$ 1,485,000</b>	<b>\$ 1,485,000</b>	<b>\$ 1,485,000</b>
Sidewalk Reconstruction Program*	\$ 1,485,000	\$ 1,485,000	\$ 1,485,000	\$ 1,485,000
<b>Transfer from General Fund</b>	<b>\$ 572,000</b>	<b>\$ 172,000</b>	<b>\$ 572,000</b>	<b>\$ 172,000</b>
Bike Improvement Program	\$ 172,000	\$ 172,000	\$ 172,000	\$ 172,000
Local Street, Alley, Sewer and Lighting Program*	\$ 400,000	\$ -	\$ 400,000	\$ -

\*Annual Program

Shading reflects change from requested to tentatively recommended budgets

**Attachment A - CIB Recommendations and Comments  
2026 - 2027 Capital Improvement Committee Tentative Recommendations**

**All Projects List**

Sorted by Funding Source

Program by Funding Type	Department Requests		CIB Committee	
	2026 Requested	2027 Requested	2026 Recommended	2027 Recommended
<b>State Grants and Aids</b>	<b>\$ 14,853,400</b>	<b>\$ 4,510,000</b>	<b>\$ 14,853,400</b>	<b>\$ 4,510,000</b>
<b>Minnesota Department of Transportation</b>	<b>\$ 1,277,400</b>	<b>\$ -</b>	<b>\$ 1,277,400</b>	<b>\$ -</b>
Safe Routes to School: West Side	\$ 1,277,400	\$ -	\$ 1,277,400	\$ -
<b>Municipal State Aid</b>	<b>\$ 13,576,000</b>	<b>\$ 4,510,000</b>	<b>\$ 13,576,000</b>	<b>\$ 4,510,000</b>
Eustis/Cromwell - Territorial to Wabash	\$ 900,000	\$ -	\$ 900,000	\$ -
I35E Bridge over Shepard Signals	\$ 300,000	\$ -	\$ 300,000	\$ -
Jackson - Arlington to Wheelock Ped Imps	\$ 100,000	\$ -	\$ 100,000	\$ -
Jackson - Maryland to Arlington	\$ 1,700,000	\$ -	\$ 1,700,000	\$ -
Jackson - Rose to Arlington	\$ 1,300,000	\$ -	\$ 1,300,000	\$ -
John Ireland Bridge over 94	\$ 700,000	\$ -	\$ 700,000	\$ -
Lighting Improvements	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000
Maryland Ave Traffic Signal Enhancements	\$ 706,000	\$ -	\$ 706,000	\$ -
Minnehaha - Payne to E7th	\$ 1,500,000	\$ 1,440,000	\$ 1,500,000	\$ 1,440,000
Municipal State Aid Contingency*	\$ 300,000	\$ 300,000	\$ 300,000	\$ 300,000
Payne Pedestrian Improvements	\$ 375,000	\$ -	\$ 375,000	\$ -
Railroad Crossing Safety Improvements Program*	\$ 40,000	\$ 40,000	\$ 40,000	\$ 40,000
Ramsey County Traffic Signals Annual Program*	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000
Randolph and Lexington Sidewalk Repair	\$ 130,000	\$ -	\$ 130,000	\$ -
Rice St - Pennsylvania to Co Rd B	\$ 2,000,000	\$ -	\$ 2,000,000	\$ -
Safe Routes to School: Chelsea Heights	\$ 800,000	\$ -	\$ 800,000	\$ -
Saint Paul Streets Traffic Signals*	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000
Signalized Intersection Safety Improvements Program*	\$ 125,000	\$ 125,000	\$ 125,000	\$ 125,000
Wabasha - 7th to 11th	\$ 1,500,000	\$ 1,505,000	\$ 1,500,000	\$ 1,505,000
<b>Grand Total</b>	<b>\$ 176,839,194</b>	<b>\$ 153,689,140</b>	<b>\$ 174,599,194</b>	<b>\$ 126,388,140</b>

\*Annual Program

Shading reflects change from requested to tentatively recommended budgets

# CITY OF SAINT PAUL LONG-RANGE CAPITAL IMPROVEMENT BUDGET COMMITTEE MINUTES (Public Comment)

Monday June 9, 2025 - 5:00-7:00 PM Rondo Community Library

- I. Call to order at 5:08 pm by Chair Dees Erickson
- II. Roll Call
  - a. Members in attendance: April Eh, Carl Johnson, Darren Tobolt, Lauren Dees-Erickson, Nardos Ashenafi, Pang Yang, Tim Marino, Liam O'Brien
  - b. Members excused: Demetrius Shaw, Jes Braun, Raymond Hess
  - c. Members absent: Makayla Cox, Pat McQuillan
  - d. City Staff in attendance: Nichelle Bottko Woods, Shannon Forney – Office of Financial Services , Alice Messer – Parks and Recreation, Jules Atangana – Planning and Economic Development, Josh Schaffer –Public Libraries, Anne Weber, Sean Kershaw, Nick Peterson –Public Works, Melanie Johnson – City Council
  - e. Community Members in attendance: Bob Muschewske, Mary Cahill, Leslie Johnson, John Zwier, Beth Hyser, Jason Peterson, Tom Smith, Grace Goode, John Mannillo, Michael-jon Pease, James Gorman, Suzy Johnson, Ray Eby, Loren Danielson, Gregory Blees, Linda Valerie, Georgia Ziegler, Susan Larson, Kelly Hansen, Ky'Mari Love, Donna Swanson, Maria Steffel, Bob Cattanach, Meg Duhr, Andy Dawkins, Tom Smith
- III. Approval of 6/9 Meeting Agenda- O'Brien moved to approve the agenda, Yang seconded, motion passed.
- IV. Approval of April 21, May 12, May 19 meeting minutes – Marino moved to approve the April 21, May 12, May 19 meeting minutes, Tobolt seconded, motion passed.
- V. Public Hearing: 2026-2027 Budget  
Speakers are limited to two minutes each, larger groups are encouraged to nominate one or two representatives to speak on behalf of their community or organization to minimize repetition. Speakers provided their names and projects they were speaking in favor of or in opposition to.

Public Hearing Speakers:

<b>Name</b>	<b>Organization</b>	<b>Project</b>	<b>Favor/Oppose</b>
a. Bob Muschewske	SARPA/SOS	Summit-MRB-Fairview	Oppose
b. Leslie Johnson	Friends of SPPL	Library funding	Favor
c. Deepa Nirmal	Friends of SPPL	Library funding	Favor
d. Jason Peterson	NeighborWorks	NW- Home Projects	Favor
e. Michael-jon Peace	Friends of Mears Park	Mears/Parks	Favor
f. James Gorman		Summit MRB	Oppose
g. Darlene LaBelle, Ky'mari Love	ESNDC	Business Investment Fund	Favor
h. Meg Duhr	Fort Rd Federation	Dousman Park	Favor
i. Susan Larson	Friends of Mears	Park Mears/Parks	Favor
j. Bob Cattanach	SART	Summit-MRB-Fairview	Oppose

**CITY OF SAINT PAUL LONG-RANGE CAPITAL  
IMPROVEMENT BUDGET COMMITTEE**

- k. Greg Blee
- l. Andy Dawkins
- m. Tom Smith

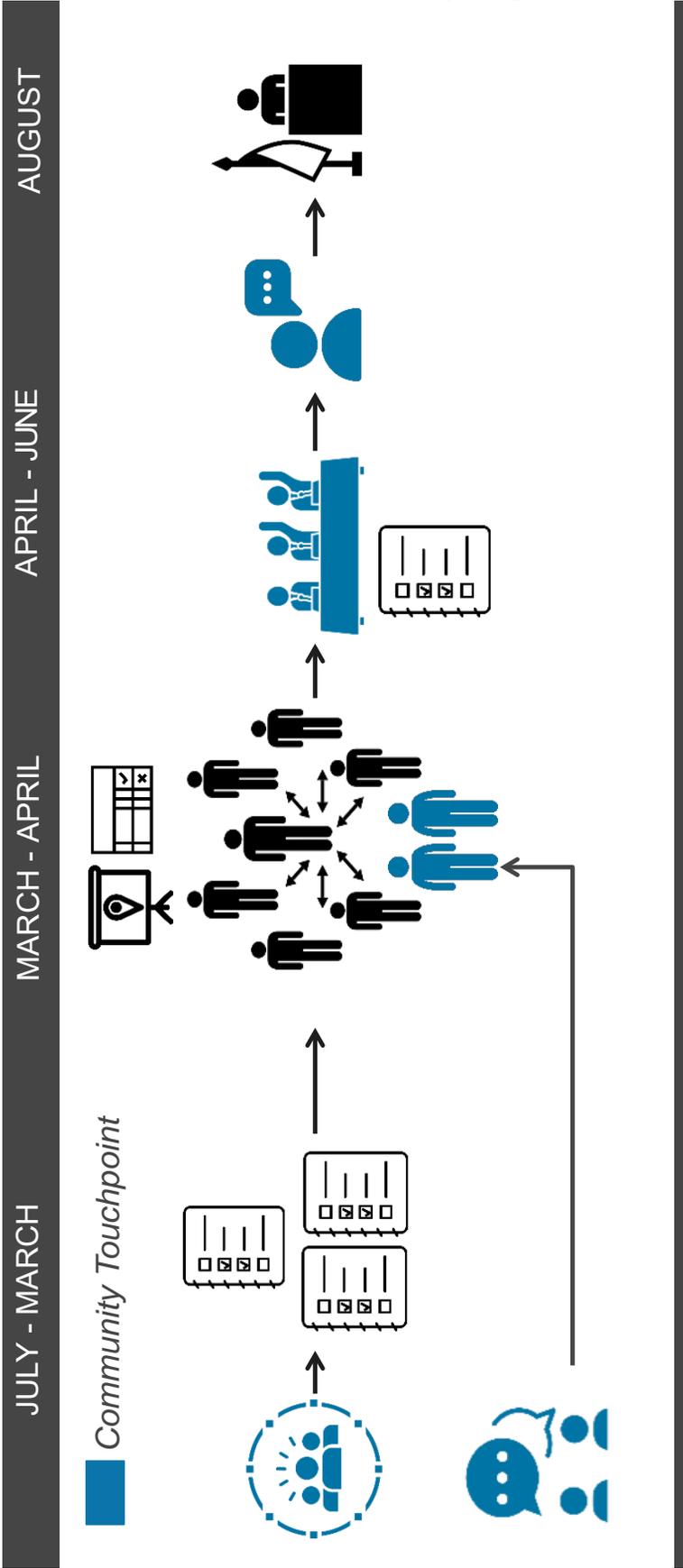
Public Hearing concluded at 5:43

- VI. Bottko Woods reviewed the 2026-2027 Tentative Funding recommendations and called attention to the submitted written testimony materials as part of the public hearing, as distributed in the June 9th meeting packet. Members were encouraged to review all materials including proposal submissions, public hearing comments, community poll results and come prepared to finalize funding recommendations at the June 16th meeting. Members were advised they could amend their CDBG scores for final funding recommendations.
- VII. Community Poll - Bottko Woods presented the Community Poll Results, both weighted and unweighted scores. There were roughly the same amount of submissions as last year. Transforming Libraries – Riverview and Hayden Heights Library Renovations ranked as the top two projects, with Como Lakeside Pavillion upgrades and Sidewalk grinding as third and fourth ranked projects, respectively.
- VIII. Announcements - Upcoming Meetings at Rondo Community Library: June 16: Additional Process Meetings, June 23: Tentative Additional Process Meeting, July 14: Regular CIB Meeting, Monday, August 11: Regular CIB Meeting
- IX. Adjourned at 6:27pm

**Attachment B - Plan Public Comment and Public Hearing Minutes**

Page intentionally blank, attachment not part of draft and will be submitted with final version after public comment period.

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



City Departments draft 5-year capital plans

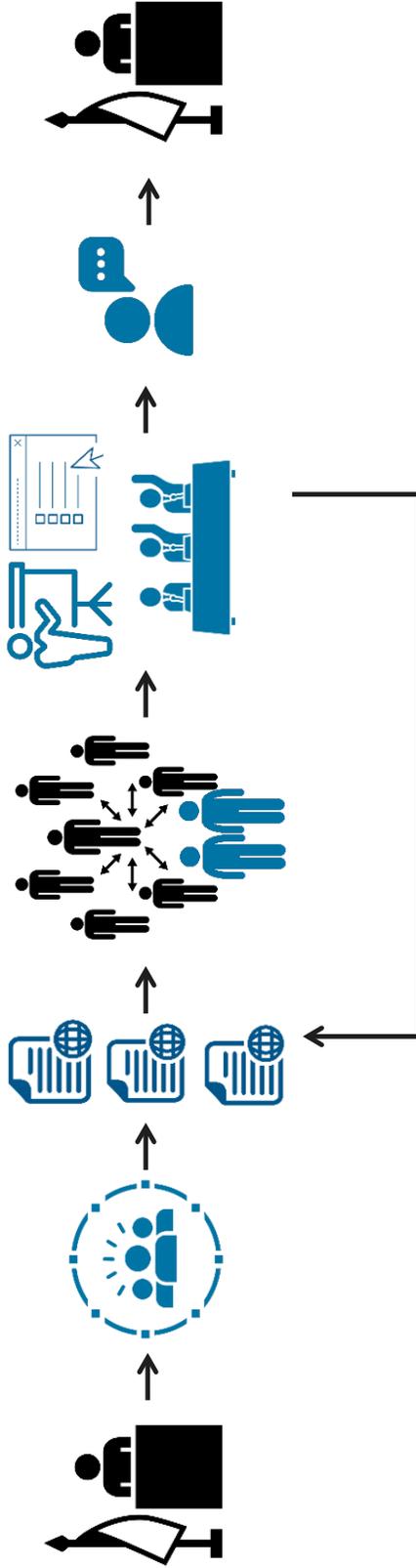
Working group uses data and engagement to create citywide 5-year plan

CIB Committee recommends project priorities for 2-year funding cycle

# Capital Improvement Plan Year 2: Community Created Projects

AUGUST - FEBRUARY      FEBRUARY - MARCH      APRIL - MAY      MAY - JUNE

**Engagement Opportunity**



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

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

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

## **The Budget Process**

The budget process follows Minnesota law, the City charter and the legislative code. The process to develop the budget commences in February.

### **January — March**

Finalize the budget for the following year. This includes preparing, printing and distributing books reflecting the adopted budget. The Office of Financial Services prepares the annual financial report for the previous year.

Identify the base budget for the upcoming year.

### **April — June**

Forms, instructions, printouts and the Mayor's guidelines are distributed to departments. Departments use these tools to plan for and develop operating budgets. Department management and staff identify objectives, performance indicators and the resources needed to accomplish goals. Review services to determine purpose, need and cost-saving ideas.

Requests for the following year's budget are submitted in June. OFS budget staff then analyze each department's budget. The Mayor meets with the department directors to discuss their needs and to ensure that budgets meet the service level and taxing objectives that have been established for the City.

### **July — September**

The budget staff finalizes the Mayor's recommendations and produces the Mayor's proposed budget. The Mayor submits the recommended budget to the City Council by August 15, per City charter.

In August, the City Council begins reviewing the Mayor's proposed budget. Council meets with department management to clarify the proposed budget. This helps ensure departments meet their goals, priorities, and objectives. As required by state law, the City Council sets the maximum property tax levy in September. Budgets may be adjusted, but they cannot exceed the maximum tax levy.

## October — December

The City Council holds public hearings on the budget. Ramsey County mails property tax statements to property owners. These statements include:

- the maximum amount of property taxes that the owner must pay
- the time and date of upcoming Truth in Taxation public hearings

State law requires the City to hold a joint meeting with the county and school district. This meeting is in early December. The City Council then adopts a budget and tax levy for the City. The adopted budget represents changes made by City Council to the Mayor's proposed budget. The Mayor has line-item veto authority over the Council-adopted budget.

## Other Budget Information

### [City Council's Budgeting and Financial Planning](#)

## Capital Improvement Budget Process (CIB)

The Capital Improvement Budget (CIB) is how we fund the construction and maintenance of City infrastructure. This includes improvements in streets, bridges, libraries, parks, recreation centers, and other public facilities and infrastructure. The budget is composed of a variety of state, federal, and local funding sources. The CIB Committee is an advisory body of 18 Saint Paul residents that recommends projects and funding levels to the Mayor every year by June 30. The Capital Improvement Budget is approved by the Mayor and City Council annually.

The Saint Paul Capital Improvement Budget (CIB) process is designed to engage residents in evaluating capital needs in the City. In 2019, we launched a new CIB process to replace the over three decades old existing process and focus more strongly on:

1. **Equity and inclusion:** Budgeting decisions reflect our commitment to equity. The CIB Committee supports identifying ways to invite more voices to the table and ensure investments are distributed equitably throughout the City.
2. **Strategic investments:** Capital investments all feed into a larger, more comprehensive strategic framework that takes advantage of data and ensures maximum return on investment.

## Attachment C - CIB and City Budget Process

3. **Fiscal responsibility:** Existing infrastructure such as roads, bridges and sidewalks – as well as existing parks and libraries facilities – are well-tended. Maintenance is prioritized.

One of the most significant changes to the process is the creation of a two-year cycle with the first year dedicated to City department-submitted projects and the second for community-submitted projects, eliminating the competition for funding between City and community projects that existed in the previous process.

### ***Odd-Numbered Years: City Department Projects***

In the spring of the odd-numbered years, a working group composed of representatives from City departments and the CIB Committee begin to review project proposals and 5-year plans submitted by City departments. As part their rev

### ***Even-Numbered Years: Community-created Projects***

The process begins with the Mayor announcing City priorities for the coming budget year. The City and CIB Committee begin recruiting applications from the community. In the spring of the even-numbered year, the working group screens submitted applications for eligibility. All eligible proposals present to the CIB Committee. Online polling provides additional data that the CIB Committee may use while considering which projects to recommend.

In both years, the CIB Committee forwards recommended capital improvement budgets for the following two fiscal years to the Mayor by late June. The Mayor proposes capital (and operating) budgets to the City Council and residents in mid-August. During the fall, the City Council reviews the Mayor's proposed budgets and holds public hearings. In mid-December, the Council adopts a final capital improvement budget for the next fiscal year and approves a tentative budget for the year after.

## **Capital Improvement Budget Process**





Emergency Solutions Grant (ESG) Program Manual  
Ramsey County Housing Stability Department

August 2021, modified October 2024

October 2024 Updates in Red throughout document

## Contents

<b>Section 1: Program Description</b>	4
<i>Purpose</i>	4
<i>Program Administration</i>	5
<i>Monitoring</i>	5
<i>Coordination</i>	6
<i>Homeless Continuum of Care Program Partnerships</i>	6
<i>Ramsey County Consolidated Plan</i>	8
<b>Section 2: Program Components</b>	9
<i>Street Outreach</i>	9
<i>Emergency Shelter</i>	12
<i>Homeless Prevention (HP)</i>	19
<i>Rapid Re-Housing (RRH)</i>	21
<i>Eligible Activities for both HP and RRH</i>	22
<i>Administrative Costs</i>	27
<i>Ineligible Activities</i>	29
<b>Section 3: Determining Eligibility and Program Requirements</b>	30
<i>Client Intake</i>	30
<i>app</i>	
<i>Income Eligibility</i>	34
<i>Determining Allowable Rent</i>	38
<i>Inspections</i>	41
<i>Case Management</i>	46
<i>Re-Assessment of Eligibility</i>	48
<i>Admin Review and Termination</i>	49
<i>Client File Checklist and Requirements</i>	51
<b>Section 4: Program Fiscal Accountability</b>	51
<i>Reporting</i>	54
<i>Reporting guidelines</i>	54
<i>County Subrecipient Invoices</i>	54
<i>Recordkeeping</i>	55
<b>Section 5: Other Federal Requirements</b>	57
<i>County Sign-offs</i>	58
<i>Faith-Based Activities</i>	58
<i>Conflict of Interest</i>	58
<i>Non-discrimination and Equal Opportunity Requirements</i>	60
<i>Homeless Participation</i>	61
<i>Written Standards for Providing ESG Assistance</i>	61
<b>Section 6: Glossary of Terms</b>	62
<b>Section 7: Appendix</b>	69
<i>Client File Documentation/Record Keeping Requirements by Category</i>	69
<i>Street Outreach Clients Category 1 Literally Homeless Clients</i>	69

## Attachment E - ESG Program Manual

<i>Street Outreach Clients Category 4 Fleeing/Attempting to Flee Domestic Violence</i>	71
<i>Emergency Shelter Category 1 Literally Homeless Clients</i>	71
<i>Emergency Shelter Homeless Category 2 Imminent Risk of Homeless Clients</i>	74
<i>Emergency Shelter Homeless Category 3 Homeless Under Other Federal Statutes Clients</i>	77
<i>Emergency Shelter Homeless Category 4 Fleeing/Attempting to Flee Domestic Violence</i>	80
<i>Rapid Re-Housing Category 1 Literally Homeless Clients</i>	83
<i>Rapid Re-Housing Category 4 Fleeing/Attempting to Flee DV</i>	84
<i>Homelessness Prevention Category 2 – Imminent Risk of Homelessness</i>	85
<i>Homelessness Prevention Category 3 – Homeless Under Other Federal Statutes</i>	88
<i>Homelessness Prevention Category 4 Fleeing/Attempting to Flee Domestic Violence</i>	90
<i>ESG and ESG-CV Invoice Claim Form Instructions</i>	92
<i>Minnesota’s HMIS Data Privacy Notice</i>	93
<i>Client File Monitoring Checklist</i>	95

The manual and guides provide a basic overview of the Emergency Solutions Grant Program and its eligible activities and requirements. Policies and procedures may be updated as the need arises. They are not intended to replace existing guidance produced by HUD. Additional program information can be found on the [HUD Exchange ESG Page](#).

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## Section 1: Program Description

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The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act, revising the Emergency Shelter Grants Program in significant ways and renaming it the Emergency Solutions Grants (ESG) program. The ESG Interim Rule took effect on January 4, 2012. The ESG regulation 24 CFR Subpart F § 576.500 outlines recording keeping and reporting requirements, with this guidance, the following policies were developed by Ramsey County. All county subrecipients of ESG funds must implement, at a minimum, the following policies.

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### Purpose

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The HEARTH Act established funding through U.S Department of Housing and Urban Development (HUD), to support specialized housing services for people experiencing homelessness. The purpose of this program is to provide housing for homeless individuals and families, along with connecting people to supportive services to assist with maintaining housing stability.

The ESG program is established by subtitle B of title IV of the McKinney-Vento Homeless Assistance Act, which authorizes HUD to issue grants for the rehabilitation or conversion of buildings for use as emergency shelter for the homeless, for the payment of certain expenses related to operating emergency shelters, for essential support services related to emergency shelters and homeless street outreach programs, and for homelessness prevention and rapid re-housing assistance.

This change expanded ESG's eligible activities from traditional homeless shelter and outreach services to include rapid re-housing and targeted homeless prevention. Additionally, the HEARTH Act also distinguishes into law the Continuum of Care (CoC) planning process, a longstanding part of HUD's application process to assist homeless persons by providing better access and coordination of services to resolve their housing crisis.

The ESG program objective is to support individuals and families experiencing homelessness, or who may be at risk of homelessness, to reestablish stability through support services described within the eligible activities outlined in this manual.

Agencies must comply with applicable laws and guidance including the requirements of:

- Housing and Urban Development (FR-5474-I-01).
- McKinney-Vento Homeless Assistance Act, Section 103, (42 U.S.C. 11302).
- HEARTH Act of 2009.
- Consolidated Submissions for Community Planning and Development Programs, (24 CFR Part 91).
- Office of Management and Budget's (OMB) *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*.

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### Program Administration

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The City of Saint Paul is the Grantee of ESG funding in Ramsey County. The county administers ESG program funds as the subrecipient. As the subrecipient, the county solicits assistance from service providers who are considered county subrecipients for the ESG program; however, as the subrecipient for this program, Ramsey County is accountable for ensuring that county subrecipients perform activities in compliance with all applicable requirements. County subrecipients are responsible, whether they are providing services directly or through other contractors, for making sure that compliance with program requirements occur at all applicable levels.

Ramsey County and county subrecipients executed contracts to formalize the partnership. To complete the contract process, the county subrecipient submitted applications that included: scope of work, financial documentation, and proposals to execute the eligible activities outlined within the ESG Program.

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### Monitoring

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As the ESG subrecipient, Ramsey County is responsible for providing oversight of ESG eligible activities that county subrecipients are providing, along with ensuring that each county subrecipient is conducting activities that are in compliance with all ESG applicable requirements, including activities as established by the county and city in consultation with the Continuum of Care (CoC) per HUD requirements.

Ramsey County staff will monitor the county subrecipient's participation in the ESG program to ensure compliance with program regulations and consistency with performance and program standards, **and consistent with the subrecipient contracts**. Monitoring visits will be scheduled per requirements outlined by HUD or based on a county subrecipient performance, budgetary reporting, program reporting or other areas of concern. It should be noted that desk monitoring as well as on-site monitoring may be scheduled at any time to assure compliance.

Monitoring has these goals:

- Provide technical support or training options.
- Ensure accountability.
- Ensure effective and efficient use of funding and resources.
- Help assess response to community needs.

Prior to the online or on-site monitoring visit, Ramsey County may request certain documents to review in advance of the visit. Documents may include: case files, the most recent financial audit with management letter, agency financial records budget, job descriptions of key employees of the organization, organizational chart, list of staff and their work experience, list of staff trainings, program financial/draw records, forms provided to clients, list of HUD-eligible

## Attachment E - ESG Program Manual

clients counseled/provided with case management within the last 12 months, and any other documentation Ramsey County may deem necessary to review grant compliance.

If Ramsey County schedules an on-site monitoring visit, appropriate space will be provided by the county subrecipient that allows for review of confidential client files, interviews with staff, and reviews of any documentation that was not provided prior to the monitoring visit.

After each monitoring visit is complete, Ramsey County will send a monitoring visit summary report that documents findings and/or concerns, project accomplishments, areas of deficiencies and technical assistance needs. These areas will be highlighted in the report and serves to confirm issues discussed during the review process and to give grantees notice of deficient areas requiring attention.

The monitoring visit questionnaire and checklist can be found in the Appendix related to client files.

Monitoring of Ramsey County and its subrecipients will also utilize current HUD published exhibits related to ESG programming in the CPD monitoring handbook (6509.2 - [https://www.hud.gov/program\\_offices/administration/hudclips/handbooks/cpd/6509.2](https://www.hud.gov/program_offices/administration/hudclips/handbooks/cpd/6509.2)). Overall program monitoring will include review of applicable audits, including the Federal Single Audit. Findings related to the ESG program in an audit will result in the City issuing a Management Decision Letter following the requirements at 2 CFR 200.332(d)(4).

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### Coordination

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Ramsey County and county subrecipients will coordinate and consolidate, to the maximum extent possible, ESG-funded programs with other programs targeted to homeless people in the area covered by Heading Home Ramsey (HHR) to provide a strategic, community-wide system to prevent and end homelessness for the area, per 24 CFR 576.400(b) and HHR's strategic priorities. This may include, coordinating with health care providers, social services, employment programs, education, youth specific programs and mainstream housing options that homeless individuals and families may be eligible.

ESG program coordination efforts are designed to increase collaboration and efficiency across different homeless programs and to maximize communitywide planning efforts by strategically utilizing resources.

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### Record Retention

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## Homeless Continuum of Care Program Partnerships

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ESG regulations require program grantees (state and local governments) to regularly consult with the CoC in their region to determine how to:

- Allocate ESG funds each program year
- Develop the performance standards and evaluate outcomes for projects and activities assisted by ESG funds
- Develop policies and procedures for the Homeless Management Information System (HMIS)

Coordination with Other Targeted Homeless Services:

- Coordinate and integrate ESG-funded activities with other homeless programs covered by the CoC to prevent and end homelessness for the area

## Attachment E - ESG Program Manual

These programs include:

- Shelter Plus Care Program (24CFR part 582)
- Supportive Housing Program (24CFR part 583)
- Section 8 Moderate Rehabilitation Program for Single Room Occupancy program for Homeless Individuals (24CFR part 882)
- HUD-Veterans Affairs Supportive Housing (HUD-VASH)
- Education for Homeless Children and Youth Grants for State and Local Activities (Title VII-B of the McKinney-Vento Homeless Assistance Act) Grants for the Benefit of Homeless Individuals (section 506 for the Public Health Services Act (42 USC 290aa-5)
- Health Care for the Homeless (42 CFR part 51c)
- Programs for Runaway and Homeless Youth (42 USC 5701 et seq.)
- Projects for Assistance in Transition from Homelessness (part C of title V of the Public Health Service Act (42 U.S.C. 290cc–21 et seq.)
- Services in Supportive Housing Grants (section 520A of the Public Health Service Act)
- Emergency Food and Shelter Program (title III of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11331 et seq.)
- Transitional Housing Assistance Grants for Victims of Sexual Assault, Domestic Violence, Dating Violence, and Stalking Program (section 40299 of the Violent Crime Control and Law Enforcement Act (42 U.S.C. 13975))
- Homeless Veterans Reintegration Program (section 5(a)(1)) of the Homeless Veterans Comprehensive Assistance Act (38 U.S.C. 2021)
- Domiciliary Care for Homeless Veterans Program (38 U.S.C. 2043)
- VA Homeless Providers Grant and Per Diem Program (38 CFR part 61)
- Health Care for Homeless Veterans Program (38 U.S.C. 2031)
- Homeless Veterans Dental Program (38 U.S.C. 2062)
- Supportive Services for Veteran Families Program (38 CFR part 62)
- Veteran Justice Outreach Initiative (38 U.S.C. 2031)

System and Program Coordination with mainstream Resources:

The county and its subrecipients must 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:

- Public housing programs within section 9 of the U.S. Housing Act of 1937 (42 U.S.C. 1437g) (24 CFR parts 905, 968, and 990)
- Housing programs receiving tenant-based or project-based assistance under section 8 of the U.S. Housing Act of 1937 (42 U.S.C. 1437f) (respectively 24 CFR parts 982 and 983)
- Supportive Housing for Persons with Disabilities (Section 811) (24 CFR part 891)
- HOME Investment Partnerships Program (24 CFR part 92)

## Attachment E - ESG Program Manual

- Temporary Assistance for Needy Families (TANF) (45 CFR parts 260–265)
- Health Center Program (42 CFR part 51c)
- State Children’s Health Insurance Program (42 CFR part 457)
- Head Start (45 CFR chapter XIII, subchapter B)
- Mental Health and Substance Abuse Block Grants (45 CFR part 96)
- Services funded under the Workforce Investment Act (29 U.S.C. 2801 et seq.)

Coordinated Entry System (CES):

Heading Home Ramsey (HHR) developed CES, in accordance with requirements to be established by HUD, each ESG-funded program or project within HHR’s area must:

- Use of CES assessment system.
  - *Centralized or coordinated assessment.* Once the Continuum of Care has developed a centralized assessment system or a coordinated assessment system in accordance with requirements to be established by HUD, each ESG-funded program or project within the Continuum of Care's area must use that assessment system. The recipient and subrecipient must work with the Continuum of Care to ensure the screening, assessment and referral of program participants are consistent with the written standards required by paragraph (e) of this section. A victim service provider may choose not to use the Continuum of Care's centralized or coordinated assessment system.
- Work with HHR to ensure the screening, assessment and referrals of program participants are consistent with the Written Standards for ESG funded projects.
  - (e) *Written standards for providing ESG assistance.* (1) If the recipient is a metropolitan city, urban county, or territory, the recipient must have written standards for providing Emergency Solutions Grant (ESG) assistance and must consistently apply those standards for all program participants. The recipient must describe these standards in its consolidated plan.

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### Consolidated Plan

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The [City of Saint Paul's Coonsolidated Plan](#) is designed to help states and local jurisdictions to evaluate their affordable housing, community development needs and market conditions, and to make data driven, place-based investment decisions.

The consolidated planning process serves as the framework for a community-wide conversation to identify housing and community development priorities that align and focus funding from the CPD formula block grant programs: Community Development Block Grant (CDBG) Program, HOME Investment Partnerships (HOME) Program, Housing Trust Fund (HTF), **Emergency Solutions Grants (ESG) Program**, and Housing Opportunities for Persons with AIDS (HOPWA) Program.

The Consolidated Plan is carried out through Annual Action Plans, which provide a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan. Grantees report on accomplishments and progress toward Consolidated Plan goals in the Consolidated Annual Performance and Evaluation Report (CAPER).

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## Section 2: Program Components

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Funding is provided under this program for the following program components and will target two populations, (1) individuals and families who are experiencing homelessness and (2) individuals and families who are currently in housing but are at risk of becoming homeless. The regulatory details for the following ESG eligible activities can be found in 24 CFR 576.101 through 108.

1. Street Outreach
  - a. Essential Services
2. Emergency Shelter
  - a. Essential Services
  - b. Shelter Maintenance/Operation
  - c. Renovation
  - d. Uniform Relocation Assistance and Real Property Acquisition Polices Act of 1970
3. Homelessness Prevention
  - a. Housing Relocation and Stabilization Services
  - b. Short and Medium-Term Rental Assistance
4. Rapid Re-housing
  - a. Housing Relocation and Stabilization Services
  - b. Short and Medium-Term Rental Assistance
5. Homeless Management Information System (HMIS)
6. Administration

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### Street Outreach

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Street Outreach services are provided on the street or in parks, abandoned buildings, bus stations, campgrounds and in other such settings where unsheltered persons are staying. Staff salaries related to carrying out street outreach activities are eligible costs. Eligible Program Participants are individuals and families who are homeless and living in a place not meant for human habitation.

#### **Essential Services**

Essential services are used to reach out to unsheltered homeless people; connect them with emergency shelter, housing or critical services; and provide urgent, non-facility-based care to

## Attachment E - ESG Program Manual

unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.

### Eligible Activities:

**Engagement Activities** - 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.

Activities include:

- Making initial assessments of needs and eligibility.
- Providing crisis counseling.
- Addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries.
- Providing information and referrals to programs targeted to homeless people, mainstream social services, and housing programs (including emergency shelter, transitional housing, community-based services, permanent supportive housing and rapid re-housing).

Allowable costs include:

Cell phone costs of outreach workers during the performance of these activities.

**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.

Activities include:

- Using Coordinated Entry System, as required under § 576.400(d).
- Conducting the initial evaluation, which includes verifying and documenting eligibility, counseling, developing, securing and coordinating services, obtaining Federal, State and local benefits, monitoring and evaluating program participant progress, providing information and referrals to other providers, developing an individualized housing and service plan, including planning a path to permanent housing stability.

**Emergency Health Services** – Costs for the direct outpatient treatment of medical conditions that are provided by a licensed medical professional operating in community-based settings, including streets, parks and other places other unsheltered homeless people are living. ESG funds may only be used for these services to the extent that other appropriate health services are inaccessible or unavailable within the area.

Eligible Treatment Activities:

- Assessing health problems and developing a treatment plan.
- Assisting program participants to understand their health care needs.
- Providing directly or assisting to obtain appropriate emergency medical treatment.

## Attachment E - ESG Program Manual

- Providing medication and follow-up services.

**Emergency Mental Health services** – Costs for direct outpatient treatment by licensed professionals of mental health conditions operating in community- based settings, including streets, parks, and other places where unsheltered people are living. ESG funds may only be used for these services to the extent that other appropriate health services are inaccessible or unavailable within the area.

Eligible Services:

Application of therapeutic processes to personal, family, situational or occupational problems

Eligible Treatment Activities:

- Crisis interventions.
- Prescription of psychotropic medications.
- Explanation about the use and management of medications.
- Combinations of therapeutic approaches to address multiple problems.

**Transportation costs** –Costs associated with transporting unsheltered people to emergency shelters or other service facilities and travel by outreach workers, social workers, medical professionals, or other service providers provided that the travel takes place during the provision of services eligible under this section.

Allowable costs include:

- Program participant travel on public transportation.
- If service workers use their own vehicles, mileage allowance for service workers to visit program participants.
- The cost of purchasing or leasing a vehicle for the county subrecipient and/or staff serving program participants and the cost of gas, insurance, taxes, and maintenance for the vehicle.
- Travel cost to accompany or assist program participants to use public transportation.

**Services for special populations** - Services for homeless youth, victim services (assisting program participants who are victims of domestic violence, dating violence, sexual assault, or stalking) and for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs 1 – 5 of this section. Victim Services include services offered by rape crisis centers and domestic violence shelters and other organizations with a documented history of effective work concerning domestic violence, sexual assault, or stalking.

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## Emergency Shelter

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Subject to the expenditure limit in § 576.100(b), ESG funds may be used for costs of providing essential services to homeless families and individuals in emergency shelters, renovating buildings to be used as emergency shelter for homeless families and individuals, and operating emergency shelters.

### Essential Services

Essential Services are used 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.

### Eligible Activities:

**Case Management** – The cost of assessing, arranging, coordinating and monitoring the delivery of individualized eligible services.

Activities include:

- Using the Coordinated Entry System.
- Conducting the initial evaluation including verifying and documenting eligibility.
- Counseling services.
- Developing, securing, and coordinating services.
- Obtaining Federal, State, and local benefits.
- Monitoring evaluating program participant progress.
- Providing information and referral to other providers.
- Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking.
- Developing an individualized housing and service plan, including planning a path to permanent housing stability.

**Childcare** – Childcare cost of children under the age of 13 unless the child is disabled. Disabled children must be under the age of 18. The childcare center must be licensed by the jurisdiction in which it operates to be eligible.

Allowable costs include:

- Meals and snacks.
- Comprehensive and coordinated sets of appropriate developmental activities.

**Educational Services** - When necessary for the program participant to obtain and maintain housing the costs of improving knowledge and basic educational skills are eligible.

Eligible Services include instruction or training in:

- Consumer education

## Attachment E - ESG Program Manual

- Health education
- Substance abuse prevention
- Literacy
- English as a second language
- General Educational Development

Component services or activities include:

- Screening, assessment, testing
- Individual or group instructions
- Tutoring
- Provision of books, supplies and instructional material
- Counseling
- Referral to community resources

**Employment assistance and job training** – Costs for employment assistance and job training programs.

Activities include:

- Classroom, online, and/or computer instruction
- On the job instruction
- Services that assist individuals in securing employment consist of:
  - Employment screening, assessment or testing
  - Structured job skills and job seeking skills
  - Special training and tutoring including literacy training and prevocational training
  - Books and instructional materials
  - Counseling or job coaching
  - Referral to community resources
- Acquiring learning skills which include skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
- Increasing earning potential

Allowable costs include:

- Reasonable stipends to program participants in employment assistance and job training.

**Outpatient Health Services** - Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals. ESG funds may be used only for these services to the extent that other appropriate health services are unavailable or inaccessible within the community.

Eligible Treatment:

- Assessing a program participant's health problems and developing a treatment plan
- Assisting participants understand their health needs

## Attachment E - ESG Program Manual

- Providing directly or assisting participants to obtain appropriate medical treatment, preventative medical care and health maintenance services, including emergency medical services.
- Providing medication and follow-up services
- Providing preventive and non-cosmetic dental care

**Legal Services** - Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the Ramsey County Bar Association and by persons(s) under the supervision of the licensed attorney, regarding matters that interfere with the programs participant's ability to obtain and retain housing. Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the county subrecipient is a legal services provider and performs the services itself, the eligible costs are the county subrecipient's employees' salaries and other costs necessary to perform the services. ESG funds may be used only for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community.

Eligible legal matters:

- Child support
- Guardianship
- Paternity
- Emancipation
- Legal separation
- Orders of protection
- Other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking
- Appeal of veterans and public benefit claims denials
- Resolution of outstanding criminal warrants

Component Services or activities may include:

- Client intake
- Preparation of cases for trial
- Provision of legal advice
- Representation at hearings
- Counseling

Ineligible costs:

- Legal services for immigration and citizenship matters
- Issues relating to mortgages
- Retainer fee arrangements and contingency arrangements

**Life Skills Training** - The costs of teaching critical life management skills that may never have been learned or have been lost during physical or mental illness, domestic violence, substance

## Attachment E - ESG Program Manual

use, and homelessness are eligible costs. These services must be necessary to assist the program participant to function independently in the community.

Component Life Skills training include:

- Budgeting resources
- Managing money
- Managing a household
- Resolving conflict
- Shopping for food and needed items
- Improving nutrition
- Using public transportation
- Parenting

**Mental Health Services** - Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management. Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions. ESG funds may only be used for these services to the extent that other appropriate mental health services are unavailable or inaccessible within the community.

Eligible Treatment consists of:

- Crisis intervention
- Individual, family, or group therapy sessions.
- Prescription of psychotropic medications or explanations about the use and management of medications.
- Combinations of therapeutic approaches to address co-occurring mental health concerns.

**Substance Abuse treatment** - Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals. ESG funds may only be used for these services to the extent that other appropriate substance abuse services are unavailable or inaccessible within the community.

Eligible Treatment consists of:

- Client intake and assessment
- Outpatient treatment for up to 30 days
- Allowable costs include
- Group and individual counseling
- Drug testing
- Ineligible costs:
- Inpatient detoxification

## Attachment E - ESG Program Manual

- Other inpatient drug or alcohol treatment

**Transportation** - Eligible costs consist of the transportation costs of a program participant's travel to and from medical care, employment, child care, or other eligible essential services facilities.

Allowable costs include:

- Program participant travel on public transportation
- If service workers use their own vehicles, mileage allowance for service workers to visit program participants
- The cost of purchasing or leasing a vehicle for the county subrecipient and/or staff serving program participants and the cost of gas, insurance, taxes and maintenance for the vehicle.
- Travel cost to accompany or assist program participants to use public transportation.

**Services for special populations** - To provide services for homeless youth, victim services (assisting program participants who are victims of domestic violence, dating violence, sexual assault, or stalking) and for people living with HIV/AIDS, so long as the costs of providing these services are eligible. Victim Services include services offered by rape crisis centers and domestic violence shelters and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault or stalking.

### **Shelter Maintenance/Operations:**

- Costs to operate and maintain emergency shelters or to provide other emergency lodging, when appropriate.

Allowable costs include:

- Maintenance (including minor or routine repairs)
- Rent
- Security
- Fuel
- Equipment
- Insurance
- Utilities
- Food
- Furnishings and supplies
- Hotel/Motel Voucher (Where no appropriate emergency shelter is available for a homeless family or individual)

### Shelter Renovation

Costs to renovate an emergency shelter. The emergency shelter must be owned by a government entity or private nonprofit organization.

Allowable costs include:

- Labor
- Materials
- Tools
- Other costs for renovation (including major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter).

**Renovated/Converted Buildings Minimum Period of Use:** Each building renovated/converted with ESG funds must be maintained as a shelter for homeless individuals and families for not less than a period of 3 or 10 years, depending on the type of renovation/conversion and the value of the building. The value of the building is the reasonable monetary value assigned to the building, such as the value assigned by an independent real estate appraiser. The minimum use must begin on the date the building is first occupied by a homeless individual or family after the completed renovation. A minimum period of use of 10 years, required for major rehabilitation and conversion, must be enforced by a recorded deed or use restriction (See 576.102(c)(i)-(iii)).

- Major rehabilitation. If the rehabilitation cost of an emergency shelter exceeds 75 percent of the value of the building before rehabilitation, the minimum period of use is 10 years.
- Conversion. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the minimum period of use is 10 years.
- Renovation other than major rehabilitation or conversion. In all other cases where ESG funds are used for renovation, the minimum period of use is 3 years.

Emergency Shelter Requirements and Special Considerations § 576.403.

**Lead-based paint remediation and disclosure.** The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821–4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851–4856), and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M, and R apply to all shelters assisted under ESG program and all housing occupied by program participants.

**Minimum standards for emergency shelters.** Any building for which Emergency Solutions Grant (ESG) funds are used for conversion, major rehabilitation, or other renovation, must meet state or local government safety and sanitation standards, as applicable, and the following minimum safety, sanitation, and privacy standards. Any emergency shelter that receives assistance for shelter operations must also meet the following minimum safety, sanitation, and privacy standards. The grantee may also establish standards that exceed or add to these minimum standards.

- **Structure and materials.** The shelter building must be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents. Any renovation (including major rehabilitation and conversion) carried out with ESG assistance must use Energy Star and WaterSense products and appliances.

## Attachment E - ESG Program Manual

- **Access.** The shelter must be accessible in accordance with Section 504 of the Rehabilitation Act (29 U.S.C. 794) and implementing regulations at 24 CFR part 8; the Fair Housing Act (42 U.S.C. 3601 et seq.) and implementing regulations at 24 CFR part 100; and Title II of the Americans with Disabilities Act (42 U.S.C. 12131 et seq.) and 28 CFR part 35; where applicable.
- **Space and security.** Except where the shelter is intended for day use only, the shelter must provide each program participant in the shelter with an acceptable place to sleep and adequate space and security for themselves and their belongings.
- **Interior air quality.** Each room or space within the shelter must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.
- **Water supply.** The shelter's water supply must be free of contamination.
- **Sanitary facilities.** Each program participant in the shelter must have access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
- **Thermal environment.** The shelter must have any necessary heating/cooling facilities in proper operating condition.
- **Illumination and electricity.** The shelter must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.
- **Food preparation.** Food preparation areas, if any, must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
- **Sanitary conditions.** The shelter must be maintained in a sanitary condition.
- **Fire safety.** There must be at least one working smoke detector in each occupied unit of the shelter. Where possible, smoke detectors must be located near sleeping areas. The fire alarm system must be designed for hearing-impaired residents. All public areas of the shelter must have at least one working smoke detector. There must also be a second means of exiting the building in the event of fire or other emergency.

**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 ESG funding or services and provides shelter to families with children under age 18.

**Essential Services and shelter operation funding considerations:** Where county subrecipient uses ESG funds solely for essential services or shelter operations, the county subrecipient must provide services or shelter to homeless individuals and families at least for the period during which the ESG funds are provide. These services or shelters are not limited to a particular site or structure, so long as the site or structure serves the same type of persons originally served with the assistance (e.g. families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or serves homeless persons in the same area where the grantee or sub recipient originally provided the services or shelter.

## Attachment E - ESG Program Manual

### Transitional Facilities

A transitional facility will only be eligible to receive ESG funds for Emergency Shelter Essential Services and Maintenance costs if:

1. It meets **BOTH** of the following criteria under the emergency shelter definition:
  - Its primary purpose is to provide a temporary shelter for the homeless in general or for specific populations of the homeless; and
  - It does not require occupants to sign leases or occupancy agreements;

OR

2. It received funds under a FY 2010 Emergency Shelter Grants grant and met the criteria under the former emergency shelter definition (“any facility, the primary purpose of which is to provide temporary or transitional shelter for the homeless in general or for specific populations of the homeless”).

### Restrictions on Street Outreach and Emergency Shelter

Combined Street Outreach and Emergency Shelter expenditures are limited to 60 percent of the grantee’s total 2010 ESG expenditures for Street Outreach and Emergency Shelter. This may be exceeded only with Ramsey County approval.

A unit of general-purpose local government is prohibited from using ESG funds to replace funds the local government provided for 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.

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### Homeless Prevention (HP)

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Homelessness prevention may be provided to individuals and families who meet the criteria under the “at risk of homelessness”, or who meet the criteria in paragraph (2), (3), or (4) of the “homeless” definition in Subsection 576.2. The cost of homelessness prevention is only eligible to help the program participant regain stability in the program participant’s current permanent housing or move into other permanent housing and achieve stability in the housing.

Housing relocation and stabilization services §576.105 and short- and/or medium-term rental assistance §576.106 may be provided to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the “homeless” definition.

ESG financial assistance cannot be provided to a program participant receiving the same type of assistance for the same period of time from another public program.

**Written standards for determining the amount of assistance is required (§576.400).**

#### ***Conditions for using HP***

**Homeless Prevention services may be provided to those “At Risk of Homelessness” meeting one of the following conditions:**

## Attachment E - ESG Program Manual

1. An individual or family who:
  - i Has an annual income below 30 percent of median family income for the area, as determined by HUD at initial eligibility determination or at or below 30 percent at re-assessment;
  - 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 60 days immediately preceding the application for homelessness prevention assistance;
    - 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 or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low income individuals;
    - 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 reside per room, as defined by the U.S. Census Bureau;
    - f) Is exiting a publicly funded institution, or system of care (such as a health-care 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 grantee's approved consolidated plan; or
2. A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), 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 Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
3. A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” 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 that child or youth if living with her or him.

### **Homeless Prevention services may be provided to those “Homeless” meeting one of the following conditions:**

Homeless Definition (2) Imminent Risk of Homelessness - An individual or family who will imminently lose their primary nighttime residence provided that:

## Attachment E - ESG Program Manual

- (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;

Homeless Definition (3) Homeless under other Federal Statutes - 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 60day 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 Homeless Definition (4) Fleeing/Attempting to Flee Domestic Violence - Any individual or family who:
  - (i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
  - (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.

### Rapid Re-Housing (RRH)

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

#### Conditions for using RRH

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

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

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

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

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

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### Eligible Activities for both HP and RRH

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#### Rental Assistance Services

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

## Attachment E - ESG Program Manual

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

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

### Eligible Activities:

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

### Tenant-based rental assistance

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

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

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

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

### Project-based rental assistance

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

## Attachment E - ESG Program Manual

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

### Special Considerations:

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

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

## Attachment E - ESG Program Manual

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

### Mobile Home Lot Rent

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

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

### Housing Relocation and Stabilization Services

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

#### Eligible Activities:

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

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

## Attachment E - ESG Program Manual

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

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

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

### **Component Services and activities:**

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

## Attachment E - ESG Program Manual

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

### Special Considerations

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

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

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### Administrative Costs

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The total county subrecipient funds that can be spent on administrative activities are 5.0% percent of the ESG grant. Employee compensation and other overhead costs directly related to carrying out street outreach, emergency shelter, homelessness prevention, rapid re-housing and HMIS activities are eligible costs of those activities and not subject to the spending limit for administrative costs. Case Management costs should be charged as program costs as described as allowable in program eligible activities and are not to be considered administrative costs.

## Attachment E - ESG Program Manual

### Eligible Activities

- Accounting for the use of grant funds.
- Preparing reports for submission to HUD.
- Obtaining program audits.
- County subrecipient staff salaries associated with eligible administrative costs.
- ESGP training for program administrator and case managers.

**Description:** General management, oversight and coordination. Cost of overall program management, coordination, monitoring, and evaluation. These costs include but are not limited to:

Salaries, wages and related costs of county subrecipient staff, the staff of county subrecipients or other staff engaged in program administration. In charging costs to this category, the grantee may either include the entire salary, wages, and related costs allocable to the program of each person whose primary responsibilities regarding the program involve program administration assignments, or the pro rata share of the salary, wages, and related costs of each person whose job includes any program administration assignments. The grantee may use only one of these methods for each fiscal year grant.

Program administration assignments include the following:

- Preparing program budgets and schedules, and amendments to those budgets and schedules.
- Developing systems for assuring compliance with program requirements.
- Developing interagency agreements and agreements with county subrecipients and contractors to carry out program activities.
- Monitoring program activities for progress and compliance with program requirements.
- Preparing reports and other documents directly related to the program for submission to HUD.
- Coordinating the resolution of audit and monitoring findings.
- Evaluating program results against state objectives.
- Managing or supervising persons whose primary responsibilities regarding the program include such assignments as described in this section.

### Allowable costs:

- Travel costs incurred for monitoring of county subrecipients.
- Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services.
- 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.
- Training on ESG requirements.
- Consolidated plan. Costs of preparing and amending the ESG and homelessness-related sections of the consolidated plan.
- Environmental review. Costs of carrying out the environmental review responsibilities under subsection 576.407.

### Employee Compensation and other Overhead Costs

## Attachment E - ESG Program Manual

- Employee compensation and other overhead costs directly related to carrying out:
  - Street Outreach
  - Emergency shelter
  - Homeless Prevention
  - Rapid Re-housing
  - And HMIS

Are eligible program components and are not subject to the Administration expenditure limit.

### Indirect Costs

ESG may be used to pay indirect costs in accordance [2 CFR § 200.414 - Indirect \(F&A\) costs](#), as applicable. Indirect costs may be allocated to each eligible activity, so long as the allocation is consistent with an indirect cost rate proposal developed in accordance with OMB circulars.

**Expenditure limits:** The indirect costs charged to an activity subject to an expenditure limit under subsection 576.100 must be added to the direct costs charged for that activity when determining the total cost subject to expenditure limit.

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### Ineligible Activities

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The intent of ESG is to provide funding for housing or emergency shelter expenses to assist persons who are homeless or would be homeless if not for this assistance. Therefore, financial assistance or services to pay for expenses that are available through other public programs are not eligible. Case managers should work to link program participants to these other resources.

**Mortgage Costs:** ESG is not a mortgage assistance program. Financial assistance may not be used to 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. Legal costs associated with refinancing a mortgage are also excluded.

### Other Ineligible Activities

In addition, ESG funds may not be used to pay for any of the following items:

- Credit card or other consumer debt
- Car repair or other transportation costs
- Participant travel costs
- Medical or dental care and medicines
- Clothing and grooming
- Home furnishings
- Pet care/ Pet fee
- Entertainment activities
- Childcare
- Cash assistance to program participants
- Duplicating payments (i.e. using ESG funds and another source for exact same cost type for same time period).
- Operations costs for housing programs
- Assistance longer than 24 months

## Attachment E - ESG Program Manual

- Direct payments to program participants
- Non-housing services, such as:
- Food, household items, clothing
- Furniture and appliances
- Discharge planning at institutions (hospitals, jails or prisons)
- Planning or developing new HMIS systems
- Development of New Software
- Contracting for program evaluation
- Certifications, Licenses and General Training Classes (e.g. for a case manager to gain credentials)
- Other costs defined as ineligible in the OMB Uniform Guidance.

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### Section 3: Determining Eligibility and Program Requirements

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Eligibility to receive assistance under all ESG programs will be based on the guidelines outlined by HUD, initially by determining if the individual or family qualifies as “homeless” as defined in the HEARTH Act of 2009, SEC. 103, or at-risk of homelessness. Evaluation and eligibility policies and procedures are developed in accordance with the centralized or coordinated assessment requirements set forth under 24 CFR 576.400(d).

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#### Client Intake

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An initial evaluation to determine program eligibility of individuals and/or families will be conducted by the county subrecipients. Agencies are expected to include documentation on the results of the eligibility assessment in the case file and what program component, Homeless Prevention or Rapid Rehousing, individuals and/or families are being assisted with.

County subrecipients are required to participate in the centralized or coordinated assessment and intake system when it becomes available in their community.

After the initial evaluation, the type and amount of assistance will be established to ensure the individual or family’s needs are met to regain stability.

**Note:** An eviction notice, and proof of income alone are not enough to determine eligibility and appropriateness for ESG.

#### Limited English Proficiency

Executive Order 13166: Limited English Proficiency is a Federal mandate that requires grantees of federal financial assistance to provide “meaningful access” to applicants and beneficiaries of their programs who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English.

#### Identification

The ESG and CoC Interim Rules do not require identification as a condition to apply for or receive homeless assistance. HUD requires only that all program participants meet the minimum eligibility criteria and that grantees comply with all local and federal requirements. Further, HUD strongly

## Attachment E - ESG Program Manual

encourages grantees to adopt Housing First practices and remove unnecessary barriers to receiving assistance, including requiring identification.

The client may, however, need identification to secure and/or maintain housing. In this situation agencies should help the client to obtain identification. ESG funds may be used to pay for primary documents, such as driver's licenses or birth records, only when the primary documents are necessary for a program participant to obtain and/or maintain housing.

### Client signatures

The ESG Interim Rule does not specifically address requirements regarding client signatures and does not require grantees to disqualify individuals or families based on inconsistent signatures, nor does it require identification as a condition to apply for or receive homeless assistance. HUD requires only that all program participants meet the minimum eligibility criteria and that grantees comply with all local and federal requirements. Further, HUD strongly encourages grantees to adopt Housing First practices and remove unnecessary barriers to receiving assistance. The fact that a program participant has used multiple signatures, even if those signatures do not match, should not affect their eligibility for ESG rental assistance. Using a preferred name is a way to affirm one's gender identity. A way to accommodate program participants who use a preferred name is to include a field on intake forms for both "legal name" as well as "preferred name".

### Informed Consent

Clients must be informed about their rights regarding personal information and sign consent forms:

Informed Consent form, with accompanying Terms of Service form. By signing this form, the client consents to provide information necessary for determining eligibility and providing services.

Authorization for Use and Sharing of Information. By signing this form, the client consents to have selected information shared with other providers in order to obtain other services or to coordinate care. **See the Minnesota HMIS Data Privacy Notice form in Appendix.**

### Citizenship Status

Verification of U.S. Citizenship or eligible immigration status is required for Homeless Prevention. Individuals of households who refuse to fill out the Declaration of Section 214 form and provide supporting documentation or submit proof of citizenship will be deemed ineligible members of the household.

County subrecipients may use the Declaration of Section 214 and supporting documentation or provide U.S. Identification that verifies citizenship. All adults in the household must sign the form. Parent/Guardian must sign the form for family member(s) under 18 years of age. (They DO NOT sign the child's name; they sign their own name). In addition, for family members with different citizenship status, complete a separate form for each citizenship status.

Examples of documents that can be used to verify citizenship include the following:

- Social Security Card
- Birth certificate
- Religious document
- U.S. Passport

## Attachment E - ESG Program Manual

- Adoption Papers
- Military Records if it shows where born
- Certificate of Naturalization (DHS Forms N-550 or N-570).
- Certification of U.S. Citizenship (DHS Forms N-560 or N-561).
- Certification of Birth Abroad of a U.S. Citizen (Form FS-240 or FS-545).
- U.S. Citizen Identification Card (Form I-197)

**Note:** A voter's registration card is not acceptable verification for proof of citizenship when citizenship is questionable since an individual is not required to verify citizenship to register to vote.

See the Declaration of Section 214 for a list of eligible immigration statuses for non-citizens and required supporting documents.

ESG benefits cannot be provided to a household member who is not a citizen or does not have an eligible immigration status but may be provided to the other household members. Instead, a prorated benefit would be paid to the household. For example, if the household consists of five members and one is not a citizen or does not have an eligible immigration status, the household would receive 4/5 of the rental assistance it would otherwise receive.

All other eligibility requirements must be verified for every household member, regardless of citizenship status.

Street outreach, emergency shelter, safe haven, and Rapid Rehousing meet the Congressionally recognized 3-part test exceptions to protect life or safety and are therefore not subject to the Act's immigration-based restrictions and therefore, do not need to prove citizenship or sign 214 form either. Refer to [HUD's Fact Sheet](#) for more information.

### Staff Certification of Eligibility for ESG Assistance

The "Staff Certification of Eligibility for ESG Assistance" form (formally "Staff Affidavit") must be completed and signed by the person determining eligibility and his/her supervisor for all households determined eligible. A new Staff Certification form is only required if a different staff person re-certifies eligibility at a later date. Visit the forms section of this document or the [HUD Exchange website](#).

The "Staff Certification of Eligibility for ESG Assistance" form must be in every case file determined eligible or recertified.

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### Housing Status Eligibility

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The household's housing status must be determined at the time of application and every three (3) months for Homeless Prevention and annually for Rapid Re-housing as part of the re-certification requirement and documentation must be in the case file.

For each client, determine whether the client is: literally homeless; imminently losing their housing; unstably housed and at-risk of losing their housing; or stably housed at program entry and exit. For clients exiting a program, the Housing Status should reflect their housing status immediately after exiting the program as determined by the client's housing destination and anticipated housing stability.

## Attachment E - ESG Program Manual

Housing status is only changed in the HMIS system upon entry and exit of the ESG program.

The following is a list of allowable Housing Status options:

Rapid Re-Housing Option:

- 1 = Literally homeless

Homeless Prevention Option:

- 2 = Imminently losing their housing
- 3 = Unstably housed and at-risk of losing their housing

Other Options at Exit:

- 4 = Stably housed
- 8 = Don't Know
- 9 = Refused

For purposes of ESG, HUD allows various types of documentation, ranging from third party verification to applicant self-declaration. Minimum acceptable types of documentation vary depending on the particular housing status and circumstance being documented. General documentation standards, in order of preference, are as follows:

1. **Written Third Party**—Verification in writing from a third party (e.g. emergency shelter provider, landlord, etc.) either directly to ESG staff or via the applicant is most preferred.
2. **Oral Third Party**—Verification from a third party provided by the third party over the telephone or in-person directly to ESG staff. Oral third-party verification is acceptable only if written third party verification cannot be obtained. ESG staff must document reasons why third party written verification could not be obtained in the ESG participant file.
3. **Applicant Self-Declaration**—An affidavit of housing status as reported by the household is allowable but is only acceptable if written or verbal third-party verification cannot be obtained. Self-declaration of housing status (e.g., eviction) should be rare. ESG staff must document reasons why third party written, or oral verification could not be obtained in the ESG participant file.

### Housing Status Documentation:

But before providing assistance through ESG, the subrecipient must determine and document if the household has any other available options or resources that may prevent them from becoming literally homeless.

For all ESG applicants, documentation of the following must be in the case file:

Other housing options (i.e., could they stay with a family member until they are able to move into a new unit or get their first paycheck?).

- Assess and document all other appropriate housing options.
- Verify that no other housing options are available.
  - Must be documented by ESG case manager or authorized staff

## Attachment E - ESG Program Manual

- Include assessment summary or other statement indicating that applicant has no other appropriate housing options,
- Be signed and dated by ESG case manager or other authorized ESG staff.
- Include documentation indicating no other subsequent housing options in the case file.
- Support networks and financial resources to obtain immediate housing or remain in current housing.
  - Assess with applicant all financial resources AND support networks (i.e. friends, family or other personal sources of financial or material support).
  - Verify that applicant lacks financial resources and support networks to obtain other appropriate subsequent housing or remain in their housing.
  - Assessment Form or Other Documentation must:
    1. Be documented by ESG case manager or other authorized staff.
    2. Include review of current account balances in checking and savings accounts held by applicant household.
    3. Include assessment summary or other statement indicating that applicant lacks financial resources and support networks to obtain other appropriate subsequent housing or remain in their housing.
    4. Be signed and dated by ESG case manager or other authorized ESG staff.
  - Include documentation indicating insufficient financial resources and support networks in participant case file.

NOTE: Remember, specifically for housing status, determining eligibility can be a multi-level process; applicants must meet ALL criteria and evidence of this must be present in the case file.

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### Income Eligibility

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**Homelessness Prevention Income Requirements.** The ESG Program interim rule limits eligibility for homelessness prevention assistance to individuals and families with incomes below 30 percent of AMI at intake and incomes that do not exceed 30 percent of AMI at reassessment, which must take place not less than once every 3 months. Income must be calculated at the time of application and every three (3) months thereafter as part of the re-certification process for individuals or families receiving Homelessness Prevention. Income calculations must be documented in the client file.

**Rapid Re-Housing Income Requirements.** Please keep in mind for program participants receiving ESG "Rapid Re-Housing" assistance, an income assessment is not required at initial evaluation. At reevaluation - which must take place not less than once annually for rapid re-housing - the participant's household must have an annual income that does not exceed 30 percent of median family income for the area, as determined by HUD.

This section provides detailed information on how to determine the Area Median Income (AMI) and how to calculate household income. Documentation of a household's total annualized gross income relative to Area Median Income and indicating the actual income guidelines for the area (30% of AMI or less) must be documented in the participant file.

## Attachment E - ESG Program Manual

### Determining Area Median Income:

A household must have a gross annual income that is at or below 30% of the AMI. AMI is determined according to the state and local jurisdiction in which a household resides or enters the program and is dependent on the number of household members. The AMI for each community can be found on [HUD's Office of Policy Development and Research website](#). Click on the "Data" tab and scroll down to the 5th section labeled "HUD 30% Income Limit for ALL Areas." Agencies should be sure to use the most recent data posted.

When working with ESG program income limits, please be aware of the following key point:

**Extremely Low Income vs. Area Median Income Limits.** The "Extremely Low Income (ELI) families" limits **do NOT** apply to the ESG or Continuum of Care (CoC) programs. ESG does not use the ELI measure to establish income limits but instead uses the 30% of Area Median Income (AMI) income limits. Please use the 30 percent AMI tables. If the county subrecipient were to use the ELI standard, some applicants for ESG assistance might be falsely determined to be eligible for homelessness prevention assistance, when actually their incomes were over 30 percent AMI.

Under the ESG program, income eligibility is based on the HUD income limits in effect at the time of income verification. Income eligibility is not based on HUD income limits that correspond with the grant year under which the ESG funds were awarded.

### Income Definition

Income is any money that goes to, or on behalf of, the head of household or spouse (even if temporarily absent) or to any other household member. Annual income includes the current (within 30 days) gross income of all adult household members (18 years of age or older) and income attributable to a minor (S.S.I., child support, etc.)

The following types of income must be counted (inclusions) when calculating gross income for the household:

- Earned Income
- Payment statement
- Statement of income from employer/source of income
- Self-Employment/Business Income
- Most recent financial statement
- Interest & Dividend Income
- Most recent interest or dividend income statement
- Pension/Retirement Income (VA, SS, and from a former job)
- Most recent benefit notice, pension statement or other payment statement from pension provider
- Armed Forces Income
- Payment statement
- Statement of income from government official/agency
- Unemployment
- Most recent benefit statement
- Disability Income (SSI, SSDI, private disability insurance and VA disability)
- Disability income notice from SSI

## Attachment E - ESG Program Manual

- Statement from SSI
- VA Benefit Letter
- TANF/Public Assistance/General Assistance
- Most recent benefit or income notice from public assistance administrator
- Statement from public assistance administrator
- Alimony, Child Support
- Court Order
- All income from full-time students when the head of household or spouse
- Income from full-time students up to \$480 annually when not head of household or spouse
- Adoption Assistance Payments up to \$480 annually
- Worker's Compensation
- No Income Reported
- Self-Certification

The following types of income are NOT counted (exclusions) when calculating gross income for ESG eligibility purposes:

- Income from employment of children, including foster children (Under 18)
- Inheritance and Insurance Income (Lump sum payments)
- Medical Expense Reimbursements
- Income of Live-in Aides
- Disabled Persons
- Student Financial Aid
- Armed Forces Hostile Fire Pay
- Self-Sufficiency Program Income – Funds set aside for use under a PASS program
- Other Income (i.e., temporary, non-recurring or sporadic income, including gifts).
- Reparations paid by a foreign government
- Income from full-time students - Annual earnings in excess of \$480 for each full-time student (18 or older)(Excluding the head of household or spouse)
- Adoption Assistance Payments - In excess of \$480 annually
- Deferred and Lump Sum Social Security & SSI payments
- Income Tax and Property Tax refunds
- Home Care Assistance
- Other Federal Exclusions- 24 CFR 5.609(c) apply (i.e. food stamps, VISTA, WIC, Childcare)

**NOTE:** Household assets are generally not counted as income, with the exception of interest and dividend income as indicated above.

### Income Calculation

Depending on pay periods used by the employer or the schedule of periodic payments, the following calculations convert the average wage into annual income:

- Hourly Wage multiplied by Hours Worked Per Week multiplied by 52 weeks
- Weekly Wage multiplied by 52 weeks
- Bi-Weekly (every other week) Wage multiplied by 26 bi-weekly periods
- Semi-Monthly Wage (twice a month) multiplied by 24 semi-monthly periods
- Monthly Wage multiplied by 12 months

## Income Documentation

### HUD's required order

1. Third Party
  - Source
    - Written, including already available documents.
    - Oral
2. Intake Staff Observations
3. Self-Certification

### Third Party – Written Letters/Referrals

- Official communication (issued on agency stationary or program template.)
- Signed and dated by appropriate third-party representative.
- Additional standards depend on criteria/condition of the Homeless Definition Category being used.

### Third Party – Recorded Oral Statements

- By intake staff of 3<sup>rd</sup> party providing verification.
- **Must be Signed and dated** by intake staff as true and complete.

**Oral Third Party**—Verification from a third party (e.g. individual employer, Social Security Administration, welfare office, etc.) provided by the third party over the telephone or in-person directly to ESG staff. Oral third-party verification is acceptable only if written third party verification cannot be obtained. ESG staff must document reasons why third party written verification could not be obtained in the ESG case file. The county subrecipient may use the 'Verification of Income' form to document oral third-party income verification.

### Intake Staff Observations

**Applicant Self-Certification**—an affidavit of income status as reported by the household is allowable but is only acceptable if written or verbal third-party verification cannot be obtained. ESG staff must document reasons why third party written, or oral verification could not be obtained in the ESG case file. See [Homeless Prevention and Rapid Re-Housing ESG Self-Declaration of Income](#) template for an example. At a minimum, self-declaration documentation must include, source, amount, frequency, applicant's signature, and date.

### HUD's Required Order documentation requirements do not apply when providing:

- Emergency Shelter Assistance (Unsheltered Homeless)
- Street Outreach Assistance
- Domestic Violence Assistance

**Note:** ESG staff must clearly and briefly describe in case file anytime written third party documentation is not used. This may be done as part of the documented client assessment or as part of other case file documentation (e.g., in case notes, on the income verification form).

### Timeliness of Documentation

## Attachment E - ESG Program Manual

Documentation that is dated within 30 days prior to the time of application is acceptable for purposes of ESG. However, a statement received any time within the twelve months prior to the time of application and reflecting current benefits received by an applicant household is allowed.

### Treatment of Assets

Assets are cash or material items that can be converted to cash quickly. They include real property, personal property, and investments that a household may possess, including assets that are owned by more than one person, but allow unrestricted access to the applicant.

Assets include:

1. Amounts in checking and saving bank accounts.
2. Stocks, bonds, savings certificates, money market funds, and other investment accounts.
3. The cash value of trusts that may be withdrawn by the household.
4. IRA, Keogh and similar retirement savings accounts, even when early withdrawal will result in a penalty.
5. Lump sum receipts of cash received and accessible by household, such as inheritances, capital gains, lottery winnings, insurance settlements, and other claims.

In Ramsey County, ESG applicants cannot have liquid assets totaling more than two (2) months of 80% of Fair Market Rate Value for rentals in Ramsey County.

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## Determining Allowable Rent

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### Fair Market Rent and Rent Reasonableness

As explained in the ESG Notice, similar to the rules of other HUD housing programs, the interim rule prohibits rental assistance from being provided for a housing unit, unless the total rent for the unit 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 24 CFR 982.507. These rent restrictions are intended to make sure that program participants can remain in their housing after their ESG assistance ends.

These rules apply regardless of whether a household is seeking to maintain its current housing (Homelessness Prevention), or if the household is exiting homelessness into new housing (Rapid Re-Housing).

To aid in understanding the rules and implementing them, HUD has released the [Rent Reasonableness and Fair Housing Market Rent](#) guidance for the ESG Program. It explains the requirements and addresses how to determine whether the unit cost exceeds or does not exceed FMR, how to calculate the gross rent amount, and tips for determining and documenting compliance.

**Fair Market Rent (FMR):** Units must not exceed the FMR established by HUD for its geographical area. For purposes of calculating rent under this section, the rent shall equal the sum of the total monthly rent for the unit, and 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. It is not permitted to allow clients to pay the difference if a unit is above FMR.

## Attachment E - ESG Program Manual

**Rent reasonableness:** Rent reasonableness is an ESG requirement when determining if a unit is eligible for ESG assistance. It is determined on a case-by-case basis. Rent reasonableness should be determined by considering the following:

1. The reasonableness in relation to rents being charged for comparable unassisted units, taking into account the location, size, type, quality, amenities, management, and maintenance of each unit.
2. The rent should not be in excess of rents currently being charged by the same owner for comparable unassisted units. As the notice states, this comparison can include units advertised for rent as well as those actual rents charged.

Agencies must determine, and document rent reasonableness for all units for which ESG rental assistance is being provided. The requirement applies whether homelessness prevention assistance or rapid re-housing assistance is provided (i.e. when participants are moving into units and when there is a current lease in place).

If the rent for the unit does not meet the rent reasonableness standard, then ESG funds may not be used to assist the household in that unit. Further, ESG funds cannot be used to pay the rent up to the rent reasonable standard, while the tenant pays the remainder. However, an eligible household could receive ESG assistance to relocate to another unit that does comply with rent reasonableness standards and is ultimately more affordable to the household.

In the Notice, HUD set a requirement that rents must be in compliance with the HUD standard of "rent reasonableness." However, it is up to the grantee to determine exactly which documentation it will require in order to ensure that the rent reasonableness standard is met. Agencies may choose to use HUD's [Rent Reasonable Checklist and Certification](#).

**Exceptions:** The rent restrictions discussed in the ESG Interim Rule at 24 CFR 576.106(d) (rent reasonableness and Fair Market Rents) do not apply when ESG funds are being used solely for rental arrears assistance. Furthermore, they do not apply when a program participant receives only financial assistance or services under Housing Stabilization and Relocation Services. This includes rental application fees, security deposits, an initial payment of "last month's rent," utility payments/deposits, and/or moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, legal services, and credit repair.

**Note:** "Last month's rent" may not exceed the rent charged for any other month; security deposits may not exceed 2 months' rent.

### **Rental Assistance Agreement**

The subrecipient may make rental assistance payments only to an owner with whom the subrecipient has entered into a rental assistance agreement. The agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply. The rental assistance agreement must provide that, during the time of the agreement, the owner must give the subrecipient a copy of any notice to the participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the participant.

It must at least include the following:

## Attachment E - ESG Program Manual

- A provision requiring the owner to give the grantee/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, as indicated in §576.106(e)).
- The same payment due date, grace period, and late payment penalty requirements as the program participant's lease, as indicated in §576.106(f)).
- For project-based rental assistance, the initial term of the rental assistance agreement must be one (1) year. For tenant-based rental assistance, grantees/county subrecipients should establish the term of the rental assistance agreement for the period of time they anticipate providing assistance.

The rental assistance agreement should also include provisions addressing the following:

- **Type of rental assistance:** tenant-based or project-based.
- **Late Payments:** If a grantee/subrecipient incurs late payment penalties, it is the sole responsibility of the grantee/subrecipient to pay those penalties using non-ESG funds, as indicated in §576.106(f).
- **Program Participant Sharing in Rent:** The grantee/subrecipient may require the program participant to pay a portion of the monthly rental cost. In such cases, the grantee (or subrecipient, if applicable) must have written policies and procedures for determining the program participant's portion, and the rental assistance agreement should specify the amount of rent to be paid by the grantee/subrecipient and the amount to be paid by the program participant, as indicated in §576.106(b).
- **Termination:** When providing tenant-based rental assistance, the rental assistance agreement with the owner must terminate and no further rental assistance payments may be made under that agreement if: the program participant moves out of the housing unit; the lease terminates and is not renewed; or the program participant becomes ineligible to receive ESG rental assistance §576.106(h).

Even when the assistance is solely for arrears, a rental assistance agreement is required, because rental arrears are considered rental assistance. For payments of rental arrears, the agreement should provide the amount paid by the grantee/subrecipient, include the number of months of arrears paid, and any other terms and conditions of the payment. The agreement should reflect the evidence/documentation used to justify that the arrears are an eligible payment.

### Lease

Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit. The lease must be between the owner and the program participant. For participants living in housing with project-based rental assistance, the lease must have an initial term of one year.

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 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.

## Attachment E - ESG Program Manual

Each lease executed on or after December 16, 2016 must include a lease provision or incorporate a lease addendum that includes all requirements that apply to tenants, the owner or lease under 24 CFR part 5, subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), as supplemented by 24 CFR 576.409, including the prohibited bases for eviction and restrictions on construing lease terms under 24 CFR 5.2005(b) and (c). If the housing is not assisted under another “covered housing program,” as defined in 24 CFR 5.2003, the lease provision or lease addendum may be written to expire at the end of the rental assistance period.

**Note:** When providing project-based rental assistance, additional conditions and requirements apply for both leases and rental assistance agreements. See section 576.106(i) of the ESG interim rule for specific requirements.

Per section 576.500(h) of the ESG interim rule, client files/records must include copies of all leases and rental assistance agreements, documentation of payments made to owners for the provision of rental assistance, and supporting documentation for these payments, including dates of occupancy by program participants.

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### Inspections

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#### Habitability Standards

**Emergency Shelters:** All shelters must meet minimum habitability standards. Shelters renovated with ESG funds are required to meet state or local government safety and sanitation standards, include energy-efficient appliances and materials.

**Accessibility:** Reasonable accommodations for persons with disabilities must be made in order to enable program participants with a disability to have an equal opportunity to participate in the program or activities. If undertaking shelter alterations, you must consult with the specific requirements to be in compliance with 24 CFR Part 8.

**Housing Standards:** If ESG funds are used to help a program participant remain in or move into permanent housing that housing must meet habitability standards. Inspections must be conducted upon initial occupancy and signed by the county subrecipients.

An on-site inspection is required anytime a program participant is receiving ESG financial assistance. (Financial assistance includes arrears, rental assistance, security deposit assistance, utility assistance, etc.). Habitability inspections are not required for persons receiving services only (anything other than financial assistance).

Following are the habitability standards that grantees must follow:

- The unit must be in compliance with all applicable state and local housing codes and licensing requirements.
- **Structure and materials:** must be structurally sound so as not to pose any health and safety threat to occupants and to protect occupants from the elements.
- **Access:** must be accessible to occupants without being accessible to unauthorized persons, and must provide an alternate means of egress in case of fire.

## Attachment E - ESG Program Manual

- **Space and security:** must afford adequate space and security for occupants and belongings including an acceptable place to sleep.
- **Interior air quality:** each room or space must be provided with natural or mechanical ventilation and must be free of air pollutants at levels that threaten the health of the occupants.
- **Water supply:** must be free from contamination.
- **Sanitary facilities:** Residents must have access to sufficient sanitary facilities that are in proper operating condition, may be used in privacy, and are adequate for personal cleanliness and the disposal of human waste.
- **Thermal environment:** must have adequate heating and or cooling facilities in proper working condition.
- **Illumination and electricity:** must have adequate natural or artificial illumination to permit normal indoor activities and to support the health and safety of occupants. Sufficient electrical sources must be provided to permit use of essential electrical appliances while assuring safety from fire.
- **Food preparation and refuse disposal:** all food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a sanitary manner.
- **Sanitary condition:** housing and any equipment must be maintained in a sanitary condition.
- **Fire safety**
  - Each dwelling must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing-impaired persons, smoke detectors must have an alarm system designed for the hearing-impaired in each bedroom occupied by a hearing-impaired person.
  - Public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired detectors. Public areas include, but are not limited to, laundry rooms, community rooms, day care centers, hallways, stairwell, and common areas.
  - There must also be a second means of exiting the building in the event of fire or other emergency.

The Housing Quality Standards (HQS) used for other HUD programs are more stringent than the habitability standards outlined in the ESG Notice. Agencies are not required to use HQS but may do so if they choose.

Habitability standards do not require a certified inspector to conduct on-site inspections.

Inspections must be conducted upon initial occupancy and then on an annual basis for the term of ESG assistance.

## Attachment E - ESG Program Manual

Agencies should use the “ESG Habitability Standards Checklist” in the Appendix as a guide to conduct the on-site inspection. This checklist should be completed upon initial occupancy and on an annual basis for the term of ESG assistance. Copies of the completed checklists should be included in the case files for documentation purposes.

### Lead-based Paint Requirements

The lead-based paint requirements exist to protect vulnerable families from potential health hazards. To prevent lead-poisoning in young children, agencies must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and its applicable regulations found at CFR 35, Parts A, B, M, and R. As agencies that provide assistance to and advocate on behalf of disadvantaged populations, it is important to understand that the lead rule is a tool that helps you ensure the safety and well-being of your clients.

Under ESG, the rule is that a lead-based paint visual assessment must be completed for all units that meet the three following conditions:

1. The household living in the unit is being assisted with ESG financial assistance (rent assistance, utilities assistance, utility/security deposits, or arrears).
2. The unit was constructed prior to 1978.
3. A child under the age of six is, child under 6 will be living in the unit or a pregnant woman will live there.

**Note:** Emergency Shelters receiving funds must meet the Lead-Based Paint requirements as a condition of funding.

The lead requirements apply regardless of whether a household is remaining in an existing unit or moving to a new unit. The visual assessment must be completed prior to ESG assistance being provided, and annually thereafter.

There are certain exceptions to the rule. Visual assessments by ESG staff are not required under the following circumstances:

- It is a zero-bedroom or Single Room Occupancy (SRO) sized unit (studio apartments, dormitories, etc.).
- X-ray or laboratory testing of all painted surfaces by certified personnel has been conducted in accordance with HUD regulations and the unit is officially certified to not contain lead-based paint.
- The property has had all lead-based paint identified and removed in accordance with HUD regulations.
- The client is receiving Federal assistance from another program, where the unit has already undergone a visual assessment within the past 12 months – e.g., if the client has a Section 8 voucher and is receiving ESG assistance for a security deposit or arrears (note, in such cases, ESG staff are required to obtain documentation that a visual assessment has been conducted from the agency administering the other form of assistance for the ESG case file); or
- It meets any of the other exemptions described in 24 CFR Part 35.115(a).

## Attachment E - ESG Program Manual

If any of the conditions outlined above are met, ESG program staff simply need to document the condition by completing the [ESG Lead Screening Worksheet](#) and placing a copy in the case file. (Note: While grantees are required to document compliance with the lead rule, they are not required to use this particular screening worksheet. This tool was developed as a sample to assist agencies who may be looking for resources to use in their local programs.) Remember, regardless of these exceptions, all properties are still subject to the disclosure requirements.

**Disclosure requirements:** Disclosure requirements are triggered for ALL properties constructed prior to 1978. These require that property owners or managers provide tenants with:

- HUD’s disclosure form for rental properties disclosing the presence of known and unknown lead-based paint; AND
- A copy of the “[Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools](#)” pamphlet. Both the disclosure form and pamphlet are available. As explained, this requirement actually relates to property owners/managers, but sharing this information with your clients (or ensuring they have received it) is an easy thing to do and will make your job easier. ESG assessments are an important opportunity to educate clients about the potential hazards related to lead and their rights as tenants. Informed tenants are more likely to watch for potential problems in their home and proactively work with landlords to address any issues.

Program staff should consider sharing the following templates that are available on the HUD Exchange with property owners/managers as well as residents to outline responsibilities and provide additional guidance:

- [Instructions for Property Owners with Tenants Receiving Tenant-Based Rental Assistance](#)
- [Lead-Based Paint Instructions for Residents Receiving Homeless Prevention and Rapid Re-Housing](#)

Depending on the results of the visual assessment, additional steps may be required before assistance can be provided for that unit.

### ESG Program Staff Responsibilities

- Determine whether lead-based paint requirements are triggered.
- Inform ESG client and property owner of the lead-based paint requirements and schedule visual assessment.
- Conduct visual assessment.
- Identify risks and compare to ["de minimis"](#) level.
- Make assistance determination.
- Confirm all identified deteriorated paint has been stabilized.
- Respond to a child with elevated blood leads levels.
- Annually conduct ongoing lead-based paint monitoring.

ESG program staff is responsible for ensuring that property owners/managers understand their responsibilities with regard to lead-based paint hazards.

### Property Owner/Manager Responsibilities

## Attachment E - ESG Program Manual

- Distribution of pamphlets and disclosure notice to occupants.
- Perform paint stabilization.
- Use safe work practices.
- Obtain clearance.
- Provide Notice of Lead Hazard Reduction to tenants.
- Conduct ongoing lead-based paint maintenance.

Anyone may become a HUD-Certified Lead-Based Paint Visual Assessor by successfully completing a 20-minute [online training](#) on HUD's website. The training instructs individuals how to identify deteriorated paint and how deteriorated paint must be treated.

### Environmental Review

ESG activities are subject to environmental review under HUD's environmental regulations in 24 CFR Part 58. HUD has authorized states and units of general local government to assume HUD's responsibilities for environmental review. As the ESG Grantee, the City of Saint Paul must review all projects with funding from the US Department of Housing and Urban Development (HUD) for mitigation and approval. These responsibilities of the city are directed by the US Department of Housing and Urban Development (HUD) under the Code of Federal Regulations relating to HUD's Environmental Review procedures (24 CFR § 58.1 and 24 CFR 58.43).

The same environmental reviews procedures remain that have been required for all Emergency Shelter Grants program grants. The environmental effects of each application must be assessed in accordance with the provisions of the National Environmental Policy Act of 1969 (NEPA) and the related authorities listed in HUD's implementing regulations at 24 CFR Parts 50 and 58.

Environmental regulations provide certain categorical exclusions under NEPA and under Part 58 set conditions under which excluded activities may be determined exempt from all environmental review requirements. In cases where proposed assistance and matching contributions solely involve operating costs for facilities or the provision of essential services, and the structures and sites involved in the project meet the program requirements of this part, these activities are categorically excluded by regulation and may be determined fully exempt from environmental review by the City of Saint Paul.

Funds may not be obligated or expended for activities in projects that have not been previously environmentally cleared. ESG funds distributed by the city to units of local government, will require that unit of local government to assume the environmental responsibility specified in Section 104 (g)(1) of the Housing and Community Development Act of 1974. The city will be responsible for providing the release of funds in accordance with the requirement of 24 CFR Part 58.

Funds distributed by the city to nonprofit organizations will require the city to assume the environmental responsibilities specified in Section 104 (g)(1) of the Housing and Community Development Act of 1974, as amended in 1992. The city will provide the release of funds in this instance. In either case, funds may be obligated or expended only after the Request for Release of Funds and Certification of Compliance with Environmental Regulations at 24 CFR Part 58 have been approved for projects provided that fifteen (15) calendar days have elapsed from the time of receipt of the Request for Release of Funds and the Certification and if no objections from the public are

received. Further information and resources on the [Environmental Review for ESG Activities](#) can be found on the HUD Exchange.

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### Case Management

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Assistance through the Emergency Solutions Grants (ESG) program is intended to be provided as a part of a system-wide approach. In order to evaluate and coordinate services to the greatest extent possible, ESG grantees and county subrecipients providing ESG-funded rental assistance or housing and relocation services under the Rapid Re-Housing and/or Homelessness Prevention components must:

- Develop a plan with each program participant on how they will retain permanent housing after the ESG assistance ends (see 24 CFR 576.401(e)(1)(ii)).
- Require program participants to meet with a case manager not less than once per month while they are receiving ESG-assistance to implement the plan and monitor progress towards housing stability (see § 576.401(e)(1)(i)).
- Assist program participants in obtaining appropriate supportive services, as well as connecting them to other federal, state, local, and private benefits and services for which they may be eligible. This includes, but is not limited to, Medicaid, SNAP, WIC, unemployment insurance, SSI/SSDI, services for veterans, and TANF (see § 576.401(d)).
- Have written policies and procedures for coordination among different providers of services in the community. Activities must be coordinated and integrated to the maximum extent practicable (see § 576.400(e)(3)(v)).

The approach to case management described above is required when providing any amount of Rapid Re-Housing or Homelessness Prevention assistance, even when just a one-time payment of rent/utility arrears is being provided. In this instance, a single case management session may meet the program's requirements so long as the housing plan can be established and the referrals to mainstream resources can be completed during the initial intake meeting. The grantee or subrecipient may require the program participant to attend additional follow-up meetings as a condition of receiving assistance.

#### **Housing and Services/Stabilization Plan**

Housing and services plan should be completed for all participants that receive an initial intake evaluation, if necessary. The plan is intended to be a guide for both the participant and the county subrecipients. It should focus on obtaining or maintaining housing with defined goals, outcomes and timelines. The plan should also identify needed community resources, referrals to partnering agencies especially for mainstream benefits, budget education and tenant education.

Obtaining or maintaining stable housing is a likely primary goal and other steps needed to achieve housing stability (such as employment or needed supports) are likely related goals. Plans must be developed with full involvement from household members and should start with a strength's assessment. Case managers should build plans around the client's own goals. Service needs may include: mental health, substance abuse, domestic violence, education, employment, and health

## Attachment E - ESG Program Manual

care. The plan should assist the program participant in retaining permanent housing after the ESG assistance ends.

Participants must be assisted, as needed, in obtaining appropriate supportive services such as medical or mental health treatment or services essential for independent living including mainstream benefits (Medicaid, SSI, SSDI, SNAP, WIC, etc.)

In addition to assessing and documenting income and the current housing situation of applicant households, the agencies must also assess and document that the household would become homeless but for the ESG assistance. This includes assessing and documenting a household's support networks, monthly budget of expenses, financial resources and other housing options.

### **Providing ESG Case Management Services without Rental or Financial Assistance**

Under the Rapid Re-Housing and Homelessness Prevention components, ESG funds can be used for case management services (or other services) alone. That is, although rental assistance cannot be provided independent of case management services, case management can be provided independent of rental assistance. For example, services (such as case management) could be provided after the term of a program participant's rental assistance expires, as long as the 24-month cap for each type of assistance is not exceeded.

ESG "stand alone" case management or other services can also be provided to support program participants who receive rental assistance through non-ESG programs, as long as the individual or family is eligible for ESG assistance at the time of the intake evaluation and any recertification(s) of eligibility.

### **Limitations on Housing Stability Case Management Under the Rapid Re-Housing Component**

Sometimes, households that are eligible for Rapid Re-Housing assistance reside in an emergency shelter or in a place not meant for human habitation while they wait for a unit to be identified. The following principles for charging the costs of housing stability case management under Rapid Re-Housing apply in these situations:

- Grantees/county county subrecipients may provide housing stability case management assistance under the Rapid Re-Housing component for up to 30 days during the period these program participants are residing on the street or in an emergency shelter and seeking permanent housing (see § 576.105(b)(2)).
- If the program participant needs more than 30 days of housing stability case management assistance while they are sleeping in an emergency shelter or on the street (or other place not meant for human habitation), it must be charged either to Emergency Shelter: essential services or Street Outreach: case management, as appropriate. The costs are then subject to the cap on these components.
- Once the program participant is in permanent housing, housing stability case management can be provided under the Rapid Re-Housing component for up to 24 additional months.

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## Re-Assessment of Eligibility

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### Requirements

Agencies must evaluate and reassess the eligibility of ESG program participants not less than once every 3 months for Homelessness Prevention and not less than once every (1) year for Rapid Rehousing. Agencies should determine the reassessment date based on the original eligibility assessment date. The intent is to assure the household remains eligible and needs continued assistance to prevent homelessness, particularly since eligibility is based on current income as opposed to past or projected income.

At the county subrecipient's discretion, re-evaluations may be conducted more frequently than required by 24 CFR 576.401 and may also be incorporated into the case management process which must occur not less than monthly for homeless prevention and rapid re-housing participants – See 24 CFR 576.401(e) (i).

At a minimum, the re-evaluation of eligibility must establish that:

- The household does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD.
- The program participant lacks sufficient resources and support networks necessary to retain housing with ESG assistance.
- The county subrecipients may require each program participant receiving assistance to notify the county subrecipients regarding changes in the participant's income or other circumstances that affect the participant's need for assistance under ESG.

### Changes in household composition or participant's income

The limits on the assistance apply to the total assistance an individual receives, either as an individual or as part of a family (§ 576.106).

The county subrecipient may require each program participant receiving homelessness prevention or rapid rehousing assistance to notify the subrecipient regarding changes in the program participant's income or other circumstances (e.g., changes in household composition) that affect the program participant's need for assistance under ESG.

When notified of a relevant change, the county subrecipient must re-evaluate the program participant's eligibility and the amount and types of assistance the program participant needs (§ 576.401). To preserve local discretion, it is the subrecipient's choice whether to use household composition or income change other than the required re-evaluation periods of three months for homeless prevention and annually for rapid re-housing. If so, it must be documented in the written policy and procedures manual.

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## Admin Review and Termination

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## Attachment E - ESG Program Manual

### ESG Administrative Review

The purpose of the Administrative Review is to provide for the resolution of a program issue by a higher administrative authority. The Administrative Review provides the program participant an opportunity to present written or oral objections about why the proposed action is incorrect before a person other than the person (or a subordinate of that person) who made or approved the termination decision (§ 576.402).

Any aggrieved person may file a written appeal with the subrecipient in any case in which the person believes that the subrecipient has failed to properly consider the person's application for assistance under this part. Such assistance may include, but is not limited to, the person's eligibility for, or the amount of, a payment, or termination from the program.

In deciding an appeal, the county subrecipient and/or Ramsey County shall consider all pertinent justification and other material submitted by the person, and all other available information that is needed to ensure a fair and full review of the appeal.

### Subrecipient Administrative Review Process

1. If the program participant disagrees with the action taken on their case, then they have fifteen (15) days from the date of notice to request an Administrative Review and complete the Administrative Review Request Form.
2. Upon receipt of the written request for an Administrative Review, the county subrecipient will notify the program participant in writing of the scheduled date, time and place, for the review within ten (10) days of the receipt of the request. If the program participant cannot appear at the date and time set for the review meeting, the program participant shall be given a reasonable opportunity to reschedule the review meeting.
3. If the program participant fails to cooperate reasonably in scheduling and completing the review meeting, the review will be cancelled, and the meeting will not be rescheduled.
4. At the Administrative Review, the program participant will be able to present their reasons for requesting the review and will be encouraged to bring any documentation or witnesses to support their argument. The county subrecipient will explain the reasons for their decision.
5. After the program participant has presented their argument, the county subrecipient will make a determination of any steps to be taken to resolve the issue.
6. The county subrecipient will communicate its determination including an explanation of the basis on which the decision was made in writing to the client within one week.
7. The county subrecipient will prepare a written report of the review for Ramsey County within one week.

## Attachment E - ESG Program Manual

### Review Outline

Responsibility	Outline
County Subrecipient	<ol style="list-style-type: none"><li data-bbox="461 222 1333 254">1. Open the Administrative Review by stating its purpose and scope; and</li><li data-bbox="461 258 1414 327">2. Ask the program participant or his/her representative to present their side of case.</li></ol>
Participant or	<ol style="list-style-type: none"><li data-bbox="461 338 1149 369">1. Explain why the Administrative Review was requested.</li></ol>

## Attachment E - ESG Program Manual

Representative	2. Present information in support of said position.
County Subrecipient	<ol style="list-style-type: none"> <li>1. Present the county subrecipients side of the case by,               <ol style="list-style-type: none"> <li>a. Explaining the basis for the county subrecipients action.</li> <li>b. Presenting documentation in support of the action.</li> </ol> </li> <li>2. Resolve differences by:               <ol style="list-style-type: none"> <li>a. Interpreting state policies and regulations which may not be entirely understood.</li> <li>b. Explaining to the claimant the laws and regulations under which Ramsey County's ESG Program operates.</li> </ol> </li> <li>3. After both sides have presented their side, close the review meeting.</li> <li>4. Report the outcome to the program participant and Ramsey County.</li> </ol>

The program participant may withdraw their request for Administrative Review by sending a written and signed letter to the county subrecipient.

Reversed or Modified Decision: At any time during the Administrative Review, an action may be reversed or modified by the county subrecipient based on program policy.

If the Administrative Review does not resolve questions and issues relating to the adverse action to the program participant's satisfaction, the program participant may request a second review by Ramsey County.

### Department Administrative Review Process

1. If the program participant disagrees with the action taken on their case by the county subrecipient, then they have fifteen (15) days from the date of notice to request an Administrative Review by Ramsey County.
2. The program participant must send Ramsey County a copy of the original Administrative Review Form and provide an update on adverse actions.
3. Upon receipt of the written request for an Administrative Review, Ramsey County will notify the program participant in writing of the scheduled date, time, and place for the review within ten (10) days of the receipt of the request. If the program participant cannot appear at the date and time set for the review meeting, the program participant shall be given a reasonable opportunity to reschedule the review meeting.
4. If the program participant fails to cooperate reasonably in scheduling and completing the review meeting, the review will be cancelled, and the meeting will not be rescheduled.
5. The county subrecipient must give Ramsey County all relevant documents pertaining to the case and county subrecipient Review upon request.
6. At the Ramsey County Administrative Review, the program participant will be able to present their reasons for requesting the review and will be encouraged to bring any documentation or witnesses to support their argument.
7. Ramsey County will review the relevant facts, circumstances and regulations involved in the adverse action.
8. After the program review is complete, Ramsey County will make a determination of any steps to be taken to resolve the issue.
9. Ramsey County will communicate its findings in writing to the client and subrecipient within one week of the review meeting.

## Attachment E - ESG Program Manual

10. A review decision by Ramsey County is final.

The Ramsey County Review will follow a similar outline to the county subrecipient review.

**Right to representation:** A person has a right to be represented in their review. They may be represented by legal counsel, or by a relative, friend, or other spokesperson, or they may represent themselves. However, such representatives must have written authorization from the claimant to act in such a capacity and solely at the person's own expense.

**Review of files by person making appeal:** The county subrecipient shall permit a person to inspect and copy all materials pertinent to their review, except materials which are classified as confidential by the county subrecipient.

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### Client File Checklist and Requirements

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Regardless of the type of assistance provided, if the assistance was a direct service payment or a service was provided, there must be a client file that details the reason for the assistance and justifies eligibility. It is also required to keep a record of all clients that are screened and classified as ineligible. The ESG recordkeeping and reporting requirements state that for each individual and family determined ineligible to receive ESG assistance, the record must include documentation of the reason for that determination.

In order to ensure that information contained within the file is complete and accurate, refer to the Client File Documentation / Record Keeping Requirements by Category and use the **Client File Checklist form located in the forms section of the Appendix.**

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## Section 4: Program Fiscal Accountability

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### Financial Responsibilities

County subrecipients will maintain an accounting system which segregates each major ESG funding category. (Emergency Shelter/Rapid Re-Housing/Homeless Prevention) Please note the following:

- Program must not make payments directly to program participants but only to third parties such as landlords and utility companies.
- Property receiving ESG financial, or rental assistance funds may not be owned by the county subrecipients or the parent, subsidiary or affiliated organization of the county subrecipients. Rental assistance paid by program cannot exceed the actual rent costs.
- Programs may not charge program fees to participants.

## Attachment E - ESG Program Manual

### Financial Standards

Internal controls reflect the overall financial management of an organization. Standards for financial management systems of nonprofit organizations may be found in **2 CFR 200 including cost principles defined in subpart E**. The following areas should be included:

**Budget Controls:** When budget controls are adequate, the county subrecipients will have a regular, on-going basis of comparison between actual expenditures and ESG-budgeted amounts for the activities. The ESG budget will cover intended activity expenses with flexibility for adjustments during the grant period. The subrecipient will also relate its financial information to recorded outcomes.

**Accounting Controls:** Expenditures must be supported by invoices, contracts, purchase orders, etc.,

**Wages:** Wages supported by more than one funding source must be documented by records that clearly show the time distribution and wage breakdowns between programs.

**Financial records:** Financial records that are relative to ESG must be maintained for eight (8) years.

**Procurement Rules:** 24 CFR Part 84 provides regulations that govern the procurement of supplies, equipment, construction, and services to ensure that they are obtained economically and competitively. In summary, county subrecipients may use their own procurement procedures as long as they conform to the regulations. Important elements for county subrecipients to consider are: a system to handle contract disputes; a code of conduct preventing conflicts of interest; some form of cost analysis to ensure economic purchases; positive efforts to use small, minority and woman owned businesses to the maximum extent possible.

**Property Controls:** The Federal regulations regarding property controls in 24 CFR 84.34 (f) are for the purpose of tracking the assets purchased with grant funds to ensure that they are properly maintained, secure and being used for authorized purposes. Agencies using ESG funds to purchase furnishings, vehicles or equipment for an activity should keep accurate records including the following: a complete description of the item purchased a serial or other identification number, the source of funds and Grant Agreement number, the acquisition date and the cost.

### Audit Requirements

The subrecipient shall conform to the Uniform Administrative Requirements, Cost Principals, and Audit Requirements of Federal Awards (Uniform Requirements) of 2 CFR 200.302, Financial Management, 2 CFR Part 200, Subpart F, Audit Requirements and 2 CFR 200.303, Internal Controls. **If the subrecipient meets the threshold to require a , they must procure audit services consistent with the requirements in 2 CFR 200.**

### Recordkeeping

Sufficient records must be established and maintained to enable Ramsey County and HUD to determine whether ESG requirements are being met. The county subrecipient must make sure any addition subrecipient(s) assisting the county subrecipient with the ESG program also maintain appropriate and complete records.

County subrecipients shall retain all program records pertinent to client services and expenditures paid with ESG funds. It is also required to keep a record of all clients that are screened and classified as ineligible.

The ESG recordkeeping and reporting requirements state that for each individual and family determined ineligible to receive ESG assistance, the record must include documentation of the

## **Attachment E - ESG Program Manual**

reason for that determination. Currently, program records including client files must be retained for a period of eight (8) years after the Master Contract ends. If any litigation, review, claim or audit is started before the expiration of the eight (8) year period, the record must be retained until all litigation, reviews, claims or audit findings involving the records have been resolved. They should be retained for 10 years when renovation of an emergency shelter exceeded 75% of the value of the building before renovation; and 10 years when conversion of a building into an emergency shelter exceeded 75% of the value of the building before renovation.

If client file documents and signatures or policy documents are collected and maintained electronically, required documentation must be made available to Ramey County in paper form when requested or vice versa.

### **Procurement**

Purchases of services from contractors or vendors by nonprofit county subrecipients with ESG funds are subject to 24 CFR Part 84. This includes standards that prohibit conflicts of interest, procedures for open competition with consistent technical solicitations, affirmative efforts to hire minority - and women - and veteran owned businesses, maintenance of selection documentation, and a contract administration system that provides sufficient monitoring. Purchases of services from contractors or vendors by public agencies with ESG funds are subject to 24 CFR Part 85.

### **Late Payments**

The 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 county subrecipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

### **Landlord W9**

County subrecipients are required to collect the W9 for each landlord and property management institution. For more information or to get a copy of the form, please refer to the IRS.

### **Funds Reallocation and Recapture**

Per the contract, Ramsey County will review financial reports and budget allocations for the eligible program components and will re-allocate resources if necessary.

Ramsey County may, to meet production and expenditure goals, reduce the total funds of this contract for reallocation to an eligible contractor requiring additional funds in accordance with the following formulas:

1. If the Contractor has expended less than 45% of the total contract funds at 50% of the contract period, the Department may reduce the total contract funds by the difference between the 45% and the actual expenditures.
2. If the Contractor has expended less than 70% of the total contract funds at 75% of the contract period, the Department may reduce the total contract funds by the difference between the 70% and the actual expenditures.

## Reporting

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### Reporting guidelines

The county uses Service Point and Sage systems systems are used for ESG and ESG-CV grant reporting.

- Service Point: is used to collect client specific data and for providers to report direct assistance payments for the purpose of reporting to the Homeless Management Information System (HMIS).
- Sage HMIS Reporting Repository: is used for quarterly and annual reporting of HMIS data.

The City of Saint Paul uses is responsible for the use Integrated Disbursement and Information System (IDIS) and the internet-base Line of Credit Control System (eLOCCS) systems.

- IDIS: is the financial management system through which ESG grantees must drawdown funds. ESG grantees will not be entering any performance or beneficiary data into IDIS.
- eLOCCS: is the U.S. Department of Housing and Urban Development's (HUD) primary grant disbursement system, handling disbursements for the majority of HUD programs. Grant disbursements are facilitated via the Internet through the eLOCCS system. Customers (*users and approving officials*) are required to gain access to Secure System or FHA Connection. Both Secure System and FHA Connection serve as an internet gateway between the general public and the internal eLOCCS application.

### County Subrecipient Invoices

County subrecipients are required to submit a claim form, as well as supporting documentation to reconcile with the amount of the claim. Invoices are sent in by subrecipients on a monthly basis to the county shared email inbox [HSD.AP@co.ramsey.mn.us](mailto:HSD.AP@co.ramsey.mn.us)

The submitted claim form should include, but not limited to, the following:

- Employee timesheets including the position/title of employee, # of hours worked per day per pay period, wage rate, and service provided (case mgmt, security, supervision, etc) in payroll report or Excel format.
- Printout or report of General Ledger activity that shows the costs being claimed.
- Client name or HMIS # for direct assistance payments, who the check was written to (landlord for example), amount of the assistance, date provided, and service type (ie, rent) - allows us to cross-reference the HMIS system to ensure assistance payments were reported.
- Other forms of backup such as rent/mortgage statements, utility bills, etc for other eligible expenses based on ESG/ESG-CV program model.

Once received by the county, the invoice is routed to the accountant for review. This review includes reconciling the claim form with supporting documentation, checking HMIS reports to ensure that direct assistance payments were reported, and tracking and reconciling claims against providers grant budget.

## Attachment E - ESG Program Manual

After review by the accountant, the invoice is forwarded to program staff for review of eligible costs, then sent onto the Manager for final review and approval to pay. After approval is given to pay, a voucher is entered by accounting staff to send payment to the provider.

### Homeless Management Information System (HMIS)

HMIS is a client-level data collection and management system that allows for improved coordination among agencies providing services to clients. It is not a national reporting system and it is not designed to be a financial reporting/accounting system.

Section 416 (F) of the McKinney-Vento Act requires that projects receiving funding under Emergency Solutions Grant program participate in HMIS. With the exception of victim service or legal service providers, all ESG county subrecipients **MUST** enter client-level data into the HMIS in accordance to the U.S. Department of Housing and Urban Development HMIS Data Standards. Victim service providers will use a comparable database that collects client-level data over time and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to a HMIS system.

All data for a quarter must be entered by the 5th day following the end of the quarter in order to meet reconciliation and reporting requirements.

Please refer to the [HMIS Guides and Tools](#) for more information on the data standards for collecting and entering information for clients.

For [HMIS Training](#), contact the Institute for Community Alliances (ICA).

### Reconciliation Requirement

Reconciliation between the HMIS housing assistance information and the amounts invoiced to Ramsey County must be made on a quarterly basis. A quarterly report of HMIS data will be provided and the subrecipient must provide written verification that the information in HMIS is complete and accurate.

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## Recordkeeping

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Ramsey County and county subrecipients will maintain records to verify compliance with all policies, procedures and regulations in addition to the following specific requirements for recordkeeping.

### Records Retention

All ESG records must be retained for 8 years after the contract ends. While ESG policy includes a minimum of 5 years as required by 24 CFR 576.500(y), grantee contracts supersede this requirement.

Access to all books, documents, papers, or other records of Ramsey County and its county subrecipients pertaining to ESG will be given to the HUD Office of the Inspector General, the Comptroller General of the United States, or any of their authorized representatives upon request for as long as they are retained.

### Client Confidentiality

## Attachment E - ESG Program Manual

Confidentiality of all records is required. All records containing personally identifying information of any applicant for and/or recipient of ESG assistance will be kept secure and confidential.

Each county subrecipient must have written procedures to ensure:

1. The security and confidentiality of records containing any personally identifying information of any individual or family who applies for and/or receives assistance; and
2. That the address or location of any assisted individual, family or housing situation will not be made public, except to the extent that this prohibition contradicts a pre-existing privacy policy of the subrecipient.

Information regarding participants will be released only after appropriate authorization to release and/or obtain information is completed.

Access to client records should always be restricted to the employee or agent that must have access to the client's information in order to properly perform their normal job functions.

Written policies should inform clients about their rights to confidentiality and disclose that all information contained in their file is confidential. Employees or program funders with access to information about the client are bound by confidentiality guidelines and will not disclose this information without prior written consent.

Upon written request, ESG clients should have access to review their records and case file content. A private location should be provided to the client for this purpose within the subrecipient. Clients should not be allowed to remove their case file from the subrecipient; however, they may be granted copies of file contents upon request. Sponsors may charge a reasonable fee for copies.

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## Section 5: Other Federal Requirements

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### Match

Each county subrecipient of ESG funds will provide match equal to the amount of HUD funds received by Ramsey County. Matching is required to be reported annually. Limited match waivers are approved on a case-by-case basis to county subrecipients with limited financial opportunities.

Matching contributions may be obtained from any source, including any Federal source other than the ESG program, as well as state, local, and private sources.

### Federal Sources used as contributions:

- The grantee must ensure the laws governing any funds to be used as matching contributions do not prohibit those funds from being used to match ESG funds.
- If ESG funds are used to satisfy the matching requirements of another Federal program, then funding from that program may not be used to satisfy the matching requirement.
- Contributions that have been or will be counted as satisfying a matching requirement of another Federal grant or award may not count as satisfying the matching requirement.
- The matching funds must be provided during a specified contract period.

### Eligible types of matching contributions:

- Cash contributions which are expended for allowable costs.

## Attachment E - ESG Program Manual

- Noncash contributions – The value of any real property, equipment, goods, or services contributed to the ESG program provided that if they were paid for with grant funds that they would have been allowable.
- The value of any donated material or building.
- The value of any lease on a building.
- Any salary paid to staff to carry out the program of the grantee, and the value of the time and services contributed by volunteers to carry out the program.
- Program income is to be used as a match.

### Calculating the amount of noncash contributions:

- Must use a method reasonably calculated to establish the fair market value.
- Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the organization or consistent with other employers for similar work in the same labor market.
- Costs paid by program income can count provided the costs are eligible ESG costs that supplement the ESG program.

### Documenting Match

- Must keep records of the source and use of contributions made to satisfy the matching requirement in § 576.201.
- The records must indicate the fiscal year grant for which each matching contribution is counted.
- The records must show how the value placed on third-party, noncash contributions was derived.
- To the extent feasible, volunteer services must be supported by the same methods that the organization uses to support the allocation of regular personnel costs.

Please Reference § 576.201 Matching requirement for further information.

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### County Sign-offs

County sign-offs are only required for ESG when there is a new Emergency Shelter or the shelter activities to be carried out are different than those which the county has previously approved. They are only required in the county that has a shelter, not in all counties the subrecipient provides ESG services. County officials must have some opportunity to review continued Shelter services if desired.

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### Faith-Based Activities

Minimum standards for faith-based activities (24 CFR 576.406)

Religious/faith-based organizations:

- Are eligible on same basis as other organizations
- Retain their independence
- Must not engage in inherently religious activities as part of ESG-funded activities

### **Attachment E - ESG Program Manual**

- Must not discriminate based on religion or religious belief
- Must not use ESG funds to rehabilitate structures used for inherently religious activities (e.g., chapels or sanctuaries)

If local government contributes its own funds to a faith-based organization to supplement federal funds:

- Funds may be segregated or commingled
- If commingled, restrictions apply

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## Conflict of Interest

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County subrecipients must keep records to show compliance with HUD's organizational conflicts-of-interest requirements.

**Conflict of Interest (Organization/Agency Level):** ESG assistance will not be contingent on the individual's or family's acceptance or occupancy of emergency shelter or housing owned by the provider or a provider's subsidiary or parent. No provider, with respect to individuals or families occupying housing owned by the provider or a provider's subsidiary or parent, will carry out the initial evaluation under 24 CFR 576.401.

If ESG program participants are to be assisted in a property that is owned by the subrecipient or affiliated organization of the subrecipient, the grantee must submit a letter to the CPD Director requesting a waiver for good cause.

**The waiver must:**

- Include a description of the benefit(s) to ESG participants;
- Explain how the subrecipient disclosed the conflict and addresses/mitigates any potential issues;
- Demonstrate that the subrecipient has looked for other appropriate housing and it is not available, or there is a good reason why the subrecipient housing is better for the clients;
- Demonstrate that the subsidy is not tied to a unit (clients must be able to choose the subrecipient housing);
- Demonstrate that an attorney has reviewed the housing selections and determined that the activities proposed do not violate state and local law; and
- Demonstrate that there is no implied benefit to any individual or organization.

**Conflict of Interest (Individual Level):** When procuring goods and services, the provider will comply with codes of conduct and conflict of interest requirements under 24 CFR 84.42 (private non-profit) or 24 CFR 85.36 (government).

The ESG Notice states: "No person who is an employee, agent, consultant, officer, or elected or appointed official of the grantee and who exercises or has exercised any functions or responsibilities with respect to assisted activities, or who is in a position to participate in a decision-making process or gain inside information with regard to such activities, may obtain a personal or financial interest or benefit from the activity, or have an interest in any contract, subcontract, or agreement with respect thereto, or the proceeds there under, either for himself or herself or for those with whom he or she has family or business ties, during his or her tenure or for one year thereafter."

**NOTE:** Employees of a county subrecipient and their families are not automatically disqualified from receiving ESG assistance, as long as they meet the qualifications of the above paragraph (i.e., they are not in a position to exercise any responsibilities, make decisions about, gain inside information into, or obtain a personal benefit from ESG). This situation would be more likely in a large agency than it would in a very small agency.

When a conflict of interest exists, the grantee may seek an exception by writing to the local HUD Field Office, including the following information:

For states and other governmental entities, a disclosure of the nature of the conflict, accompanied

## Attachment E - ESG Program Manual

by an assurance that there has been public disclosure of the conflict and a description of how the public disclosure was made; and

For all grantees, an opinion of the grantee's attorney that the interest for which the exception is sought would not violate state or local law.

**All Transactions/Activities:** No persons involved with the ESG program or who is in a position to participate in a decision-making process or gain inside information regarding the program activities, shall obtain a financial interest or benefit from an assisted activity; or have a financial interest in any related contract, subcontract, or assisted activity; or have a financial interest in the activity's proceeds during his or her tenure or for one year following tenure. These conflict of interest provisions apply to any employee, agent, consultant, officer or elected or appointed official of the provider's agency.

If there is a question or the appearance of a conflict of interest of any type, the subrecipient should contact the local HUD field office to determine if an exception or waiver is needed.

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### Non-discrimination and Equal Opportunity Requirements

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#### Regulatory Requirements

Agencies must comply with all applicable fair housing and civil rights requirements in 24 CFR 5.105(a).

Agencies must make known that ESG rental assistance and services are available to all on a nondiscriminatory basis and ensure that all citizens have equal access to information about ESG and equal access to the financial assistance and services provided under this program.

Each subrecipient must take reasonable steps to ensure meaningful access to programs to persons with limited English proficiency (LEP), pursuant to Title VI of the Civil Rights Act of 1964. This may mean providing language assistance or ensuring that program information is available in the appropriate languages for the geographic area served by the jurisdiction and that limited English proficient persons have meaningful access to ESG assistance.

To assist the agencies, HUD published the "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons" (72 42 Federal Register 2732; January 22, 2007). This document can be accessed at the following website:

[http://www.nhlp.org/files/Limited%20English%20Proficiency%20Outline%20%20\(2-6.17.09\).pdf](http://www.nhlp.org/files/Limited%20English%20Proficiency%20Outline%20%20(2-6.17.09).pdf).

In addition, all notices and communications shall be provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with section 504 of the Rehabilitation Act of 1973 and implementing regulations at 24 CFR 8.6.

If the procedures that the grantee intends to use to make known the availability of the rental assistance and services are unlikely to reach persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for such rental assistance and services, the grantee must establish additional procedures that will ensure that such persons are made aware of the rental assistance and services.

Grantee and county subrecipients must also comply with the following other Federal Requirements:

- Fair Housing Act

## Attachment E - ESG Program Manual

- Uniform Administrative Requirements
- Equal Employment Opportunity Programs
- Minority Business Enterprises
- Nondiscrimination in Federally Assisted Programs
- Age Discrimination
- Women's Business Enterprise
- Drug Free Workplace Act
- Debarred Suspended
- Section 504 of the Rehabilitation Act
- Americans with Debarred, Suspended, Ineligible Contractors
- Affirmative Outreach Disabilities Act
- Section 6002 of the Solid Waste
- Disposal Act, as amended by the Resource Conservation and Recovery Act

### Affirmative Outreach

The county subrecipient must communicate and make known that use of ESG funded facilities, assistance and services are available to all on a nondiscriminatory basis. subrecipient must develop and implement affirmative outreach written procedures and communication tools and materials to inform persons without regard to race, color, creed, ethnicity, religion, sex, age, national origin, familial status, or disability, how to obtain access to facilities and services.

The county subrecipient must be committed to an affirmative action program as well as to comply with all "Equal Opportunity" laws and regulations which provide that no person in the United States shall on the grounds of race, color, creed, religion, sex, familial status, sexual orientation or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity funded in whole or in part with ESG funds.

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### Homeless Participation

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Unless the grantee is a State, the grantee must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the grantee, to the extent that the entity considers and makes policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG).

If the grantee is unable to meet requirement under paragraph (a), it must instead develop and implement a plan to consult with homeless or formerly homeless individuals in considering and making policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG). The plan must be included in the annual action plan required under 24 CFR 91.220.

To the maximum extent practicable, the grantee or subrecipient must involve homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG. This involvement may include employment or volunteer services.

## Written Standards for Providing ESG Assistance

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Ramsey County has provided this countywide policy and procedure manual. The county subrecipient must consider how they will administer their program and develop appropriate guidelines specific to the activities that are being provided. Written standards should be established and applied consistently within the county subrecipients program.

At a minimum, written standards must include:

- Standards for targeting and providing essential services related to street outreach.
- Policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, e.g., victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest.
- Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter.
- Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers; other homeless assistance providers; and mainstream service and housing providers (see above for a list of programs with which ESG-funded activities must be coordinated and integrated to the maximum extent practicable).
- Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.
- Standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid re-housing assistance.
- Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.
- Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receive assistance; or the maximum number of times the program participant may receive assistance.

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## Section 6: Glossary of Terms

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**Agency:** Means any private non-profit organization or unit of general local government to which a grantee provides funds to carry out the eligible activities under the grant and which is accountable to the grantee for the use of the funds provided. See also **County Subrecipient**.

**APR:** Annual Performance Report

**Arrears:** The definition of arrears is an overdue payment, pursuant to the terms of the lease.

Therefore, if the rent was due on May 10 any payment made after that date due for the month of May would be considered rental arrears, not current rent, even if that payment was made in the same month. For example, a payment made on May 20<sup>th</sup> would be arrears) ESG funds may be used to pay for rental arrears assistance (which may include late fees on those arrears) through a one-time payment of up to 6 months of rent. ESG funds may be used to pay for fees that are sometimes associated with utility arrears (such as late fees) and regaining utility service (such as reconnect fees). Keep in mind that an arrears payment is only an eligible cost if a tenant would actually be evicted for non-payment of their portion of the rent or utilities (Homelessness Prevention) or the arrears are preventing the household from obtaining permanent housing and achieving stability in that housing (Rapid Re-Housing).

**Assessment:** Is a deeper level of inquiry into the actual problem and the client's strengths and needs related to solving the problem. Assessment helps with service-matching and provides the information needed to determine the expected type, intensity, and duration of assistance a client or household might receive.

**At Risk of Homelessness:** (1) An individual or family who: (i) Has an annual income below 30 percent of median family income for the 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 (per 576.2 Paragraph 1) and (iii) meets one of the following conditions:

- a. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
- 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 or motel stay is not paid by charitable organization or by federal, State, or local government programs for low income individuals;
- 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 people per room, as defined by the U.S. Census Bureau;
- f. Is exiting a publicly funded institution or system of care (such as a health-care 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

## Attachment E - ESG Program Manual

increased risk of homelessness, as identified in the grantee's approved consolidated plan;

(2) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), 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 Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786 (b)(15)); or

(3) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 725(2) of the McKinney-Vento Homeless Act (42 U.S.C 11434a (and the parent(s) or guardians(s) of that child or youth if living with her or him).

### Chronically Homeless:

1. Is an individual or family who (i) is homeless and lives or resides in a placement not meant for human habitation, a safe haven, or in an emergency shelter; (ii) has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one (1) year or on at least 4 separate occasions in the last 3 years, where each occasion was at least 15 days; and (iii) Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000), post-traumatic stress disorder, cognitive impairments resulting from a brain injury, or chronic physical illness or disability; .
2. An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital or other similar facility and has resided there for fewer than 90 days if such person met all the criteria in paragraph (1) of this definition, prior to entering that facility; or
3. The family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all the requirements in paragraph (1) of this definition, including a family's whose composition has fluctuated while the head of household has been homeless.

**Client Location:** The ESG funding activities are available citywide and primarily benefit Saint Paul, but as part of Continuum of Care (CoC) resource coordination will include some beneficiaries residing outside of the City of Saint Paul but within the broader CoC area. To document that the majority of participants are directly residing in Saint Paul, the intake process should include client location. As the City of Saint Paul includes the majority of people experiencing homelessness in the broader CoC, the proportion of beneficiaries residing outside of the city is expected to be reasonable, per HUD guidance.

**CoC:** See Continuums of Care.

**Consolidated Plan:** A plan prepared in accordance with 24 CFR part 91. An approved consolidated plan means a consolidated plan that has been approved by HUD in accordance with 24 CFR part 91.

**Continuums of Care (CoC):** The group composed of representatives of relevant organizations, which generally includes nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement., organizations that server homeless and formerly homeless veterans, and homeless

## Attachment E - ESG Program Manual

and formerly homeless persons that are organized to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area.

**Conversion:** If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the minimum use is 10 years.

**Coordinated Entry:** A nationally recognized best practice for homeless housing and services for which established front doors/access points use a standardized assessment process to gather information on people's needs, preferences, and the barriers they face to regaining housing. Once the assessment has identified the most vulnerable people with the highest needs, the CoC follows established policies and procedures to prioritize households for referrals to appropriate and available housing and supportive services resources. It has been adopted by HUD and is required by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act as well as 24 CFR 578.7(a)(8) and HUD Notice CPD-17-01. Visit the [Heading Home Ramsey](#) website for more information on how Ramsey County has implemented Coordinated Entry.

**Current Income:** Is the income that the household is currently receiving at the time of application for ESG assistance. Income recently terminated should not be included.

**De minimus:** Is a Latin term that, in the risk assessment world, refers to a level of risk that is too minimal to cause concern.

**Department:** Means the legal entity to which HUD awards an ESG grant and which is accountable for the use of the funds provided. In this case Ramsey County. See also Grantee.

**Emergency Shelter:** Any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless, and which does not require occupants to sign leases or occupancy agreements. Any project funded as an emergency shelter under FY 2010 Emergency Solutions grant may continue to be funded under ESG. (Including any project (transitional housing) that received funding in FY 2010 as an emergency shelter may continue to be funded under the ESG program, regardless of whether the project meets the revised definition.).

**Frequent Moves:** Is defined as two. For example, when a client moves 2 or more times.

**Grantee** Means the legal entity to which HUD awards an ESG grant and which is accountable for the use of the funds provided. In this manual the grantee is the City of Saint Paul.

**Gross Income** Is the amount of income earned before any deductions (such as taxes and health insurance premiums) are made.

**Homeless:** Is defined in the "Defining Homeless rule" published 12/5/2011.

1. An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
  - a. 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;
  - b. An individual or family living in a supervised publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters,

## Attachment E - ESG Program Manual

- transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low income individuals); or
- c. 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 (meets all the requirements described in #1 above prior to entering that facility).
2. An individual or family who will imminently lose their primary nighttime residence, provided that:
    - a. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
    - b. No subsequent residence has been identified; and
    - c. 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:
    - a. 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 .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);
    - b. 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;
    - c. 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
    - d. 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:
    - a. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
    - b. Has no other residence; and
    - c. Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

## Attachment E - ESG Program Manual

**Homeless Management Information System (HMIS)** The information system designated by the Continuum of Care to comply with HUD's data collection, management and reporting standards and used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness.

**Income Inclusions:** Types of income to be counted.

**Income Exclusions:** Types of income that are not to be counted as income.

**Intake** The general process between the client's first point of contact and the decision whether or not to admit the client to a program. The intake process can include screening, assessment, referral, and verification. Intake may or may not result in program admission.

**Integrated Disbursement and Information System (IDIS):** Is the financial management system through which ESG grantees must draw down funds. ESG grantees will not be entering any performance or beneficiary data into IDIS.

**IPR:** Initial Performance Report

**LEP:** Limited English Proficiency persons include anyone "who does not speak English as their primary language and who have a limited ability to read, write, speak, or understand English . . . "(HUD LEP Guidance, 72 Fed. Reg. 2732) (Jan. 22, 2007)).

**Long Term Period:** Is defined to mean 60 days.

**Major Renovation:** If the rehabilitation cost of an emergency shelter exceeds 75 percent of the value of the building before rehabilitation, the minimum period of use is 10 years.

**Minimum Use of an Emergency Shelter converted using ESG funds.** If the conversion cost of an emergency shelter exceeds 75% of the value of the building before conversion, the minimum period of use is 10 years; otherwise, the minimum period of use is 3 years.

**Minimum Use of an Emergency Shelter rehabilitated using ESG funds.** If the rehabilitation cost of an emergency shelter exceeds 75% of the value of the building before rehabilitation, the minimum period of use is 10 years; otherwise, the minimum period of use is 3 years.

**PASS:** Plan to Attain Self-Sufficiency- This is excluded income.

**QPR:** Quarterly Performance Report

**Rapid Re-Housing Assistance:** The provision of housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help a literally homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing.

**Recipient:** Means any state, territory, metropolitan city, or urban county, or in the case of reallocation, any unit of general-purpose local government, approved by HUD to assume financial responsibility and which enters into a grant agreement with HUD to administer Emergency Solutions Grant (ESG). Replaces the existing terminology or entities that received grants. For the purpose of this manual the Recipient is the City of Saint Paul and is used interchangeably with Grantee.

**Referral:** Referring a client to a particular program for possible help, without any obligation on the part of the receiving program to actually offer or provide the help.

**Screening:** A first-level decision about whether the client is eligible for a program and/or would have a priority for those services. Screening determines who receives assistance.

**Subgrantee (Subrecipient):** Means any private non-profit organization or unit of general local government to which a grantee provides funds to carry out the eligible activities under the grant

## Attachment E - ESG Program Manual

and which is accountable to the grantee for the use of the funds provided. For the purpose of this manual the subgrantee is the Ramsey County and is used interchangeably with Subrecipient.

**Subrecipient:** any unit of general-purpose local government or private nonprofit organization to which a grantee awards ESG grant funds. This replaces the existing terminology for entities that receive subgrants. Governmental organizations, such as public housing agencies or state or local housing finance agencies are not eligible county subrecipients under the ESG program. For the purpose of this manual, the subrecipient is Ramsey County and is used interchangeably with Subgrantee.

**Targeting:** Process of determining the population to whom assistance will be directed. That is, the target population. The targeting process can occur at both the system and the program levels.

**Verification:** The gathering and review of information to substantiate the crisis situation and support program eligibility and priority determinations

**Victim Service Provider:** A private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women's shelters, domestic violence transitional housing programs, and other programs.

**Victim Services:** Services offered by rape crisis centers and domestic violence shelters and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault or stalking.

**Youth:** Is defined as less than 25 years of age. This was set at 25 years of age to adequately and appropriately address the unique needs of transition-aged youth, including youth exiting foster care systems to become stable in permanent housing.

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## Section 7: Appendix

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### Client File Documentation/Record Keeping Requirements by Category

**Note:** Documentation is different for each category; the first consideration is the type of assistance that the individual/family will receive. The following describes the information that is necessary for minimum record keeping requirements.

Regardless of the type of assistance provided, there must be a client file containing documentation that details the reason for the assistance. The documentation should include:

- Verification of Homelessness or At-Risk of Homelessness (Homeless Certification, or Self Declaration of Housing Status)
- Verification of U.S. Citizenship or Lawful Resident (Declaration of Section 214 or U.S. Identification)
- Initial Consultation Form and Case Notes
- Intake and Certification Form
- Follow-up Case Manager/Client Meetings and at least monthly case notes.
- Documented Individualized Housing and Service Plan, including planning a path to permanent housing stability
- Documentation of Financial Assistance payment (Documentation of payment must include the Type of Assistance, Payee Name, Client Name, Check Number and Amount paid using ESG funds).
- Documentation of services and assistance provided to that program participant, including, as

## Attachment E - ESG Program Manual

applicable, the security deposit, rental assistance, and utility payments made on behalf of the program participant.

- As applicable, determinations of Ineligibility – For each individual and family determined ineligible to receive ESG, the client file must include documentation of the reason for that determination.
- Documentation of the HMIS Household number or a documented reason why the number is not available.

It is also required to keep a record of all clients that are screened and classified as ineligible. The ESG recordkeeping and reporting requirements state that for each individual and family determined ineligible to receive ESG assistance, the record must include documentation of the reason for that determination.

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### Street Outreach Clients Category 1 Literally Homeless Clients

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1. For applicants who lack a fixed, regular, and adequate nighttime residence, meaning: car; park; abandoned building; bus or trains or stations; airport; campgrounds; or hotel and motels paid for by charitable organizations or federal, state or local government programs.
  - Written observation by the outreach worker; or
  - Written referral by another housing or service provider; or
  - Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in a shelter.
2. For an individual who is exiting an institution where they 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.
  - Written observation by the outreach worker; or
  - Written referral by another housing or service provider; or
  - Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in a shelter.
  - Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker, or
  - Written record of intake worker's due diligence in attempting to obtain the evidence described above evidence and certification by the applicant that states he/she is exiting or has just exited an institution where he/she resided for 90 days or less.
3. Written documentation that individuals and families are living on the streets (or other places not meant for human habitation) and are unwilling or unable to access services in an emergency shelter.
4. Documentation of compliance with the applicable requirements for providing service and assistance (576.101) includes:
  - Engagement Documentation: Initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs, including emergency shelter, transitional housing, community-

## Attachment E - ESG Program Manual

- based services, permanent supportive housing, and rapid-re-housing programs
- Case Management Documentation: Document eligibility; counseling; developing, securing and coordinating services; obtaining Federal, State, and local benefits; monitoring and evaluating program participant progress; providing information and referrals to other providers; and developing and individualized housing and service plan, including planning a path to permanent housing stability.
  - Emergency Health Services: Documentation of direct outpatient services provided.
  - Emergency Mental Health Services: Documentation of direct outpatient services provided.
  - Transportation Documentation:
    - Cost of transporting unsheltered people to emergency shelters or other service facilities.
    - Cost of Program participant's travel on public transportation

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### Street Outreach Clients Category 4 Fleeing/Attempting to Flee Domestic Violence

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#### **For Victim Service Providers:**

1. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

#### **For non-Victim Service Providers:**

1. An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the care worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
2. Certification by the individual or head of household that no subsequent residence has been identified; and
3. Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.
4. Documentation of compliance with the applicable requirements for providing service and assistance (576.101) includes:
  - Engagement Documentation: Initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing, and rapid-re-housing programs
  - Case Management Documentation: Document eligibility; counseling; developing, securing and coordinating services; obtaining Federal, State, and local benefits; monitoring and evaluating program participant progress; providing information and referrals to other providers; and developing and individualized housing and service plan, including planning a path to permanent housing stability.
  - Emergency Health Services: Documentation of direct outpatient services provided.
  - Emergency Mental Health Services: Documentation of direct outpatient services provided.

## Attachment E - ESG Program Manual

- Transportation Documentation:
  - Cost of transporting unsheltered people to emergency shelters or other service facilities.
  - Cost of Program participant's travel on public transportation.

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### Emergency Shelter Category 1 Literally Homeless Clients

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1. For applicants who lack a fixed, regular, and adequate nighttime residence, meaning: car; park; abandoned building; bus or train station; airport; camping ground; or hotel and motels paid for by charitable organizations or federal, state or local government programs.
  - Written observation by the outreach worker; or
  - Written referral by another housing or service provider; or
  - Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in a shelter.
2. For an individual who is exiting an institution where he/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.
  - Written observation by the outreach worker; or
  - Written referral by another housing or service provider; or
  - Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in a shelter.
  - Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker, or
  - Written record of intake worker's due diligence in attempting to obtain the evidence described above evidence and certification by the applicant that states he/she is exiting or has just exited an institution where he/she resided for 90 days or less.
3. Documentation of compliance with the applicable requirements for providing service and assistance (576.102) includes:
  - **Case Management Documentation for:**
    - Assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible;
    - Initial Evaluation;
    - Eligibility;
    - Counseling ;
    - Securing, coordinating services and obtaining Federal, State, and local benefits;
    - Program participant progress;
    - Information and referrals to other providers;
    - Ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
    - Individualized housing and service plans, including planning a path to permanent housing stability.
  - **Child Care Documentation for:**

## **Attachment E - ESG Program Manual**

- Childcare provided for program participants.
- Meals and snacks provided.
- Appropriate developmental activities provided.
- Verifying the child-care center is licensed.
- **Education Services Documentation for:**
  - Costs of improving knowledge and basic educational skills.
  - Instruction or training in consumer education.
  - Instruction or training in health education.
  - Substance abuse prevention instruction or training.
  - Instruction or training in literacy.
  - English as a second language instruction or training.
  - General Education Development (GED) instruction or training.
  - Component services or activities such as screening, assessment, and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.

### **Employment Assistance and Job Training Documentation for:**

- Employment assistance and job training programs, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential.
- Stipends provided to program participants in employment assistance and job training programs.
- Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
- Services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching;
- Referrals to community resources.

### **Outpatient Health Services Documentation for:**

- Direct outpatient treatment of medical conditions provided by licensed medical professionals.

### **Legal services Documentation for:**

- Legal advice provided.
- Confirming the attorney is licensed and in good standing with the bar association.
- Legal matters that interfere with the program participant's ability to obtain and retain housing. Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants.

### **Life skills Training Documentation for:**

- Life skills training necessary to assist the program participant to function independently in the community. (i.e., budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public

## Attachment E - ESG Program Manual

transportation, and parenting).

### **Mental health Services Documentation for:**

- Direct outpatient treatment by licensed professionals of mental health conditions.

### **Substance abuse treatment services Documentation for:**

- Substance abuse treatment services designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors.
- Confirming that treatment providers are licensed or certified professionals.
- Outpatient treatment up to 30 days.
- Group and individual counseling sessions.
- Drug testing.

### **Transportation Documentation for:**

- Transportation of a program participant's travel to and from medical care, employment, child-care, or other eligible essential services facilities.
- Program participant's travel on public transportation.
- Program participant's use of public transportation.

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## Emergency Shelter Homeless Category 2 Imminent Risk of Homeless Clients

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### 1. Document applicant is at risk of homelessness.

- A court order resulting from an eviction action notifying the individual or family that they must leave their residence within 14 days after the date of their application for homeless assistance; or the equivalent notice under applicable state law, a Notice to Quit (pay rent or quit), or a Notice to Terminate issued under state law;
- For individuals and families whose primary nighttime residence is a hotel or motel room not paid for by charitable organizations or federal, state, or local government programs for low-income individuals, evidence that the individual or family lacks the resources necessary to reside there for more than 14 days after the date of application for homeless assistance; or
- An oral statement by the individual or head of household that the owner or renter of the housing in which they currently reside will not allow them to stay for more than 14 days after the date of application for homeless assistance.
- The intake worker must record the statement and certify that it was found credible.

To be found credible, the oral statement must either:

- Be verified by the owner or renter of the housing in which the individual or family resides at the time of application for homeless assistance and documented by a written certification by the owner or renter or by the intake worker's recording of the owner or renter's oral statement; or
- If the intake worker is unable to contact the owner or renter, be documented by a written certification by the intake worker of his or her due diligence in attempting to obtain the owner or renter's verification and the written certification by the individual or head of household seeking assistance that his or her statement was true and complete; and

## Attachment E - ESG Program Manual

2. Certification that no subsequent residence has been identified; and
3. Self-certification or other written documentation that the individual lacks the financial resources and support necessary to reside there for more than 14 days after the date of application for homeless prevention.
4. Documentation of compliance with the applicable requirements for providing service and assistance (576.102) includes:
  - Case Management Documentation:
    - Assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible.
    - Initial Evaluation.
    - Eligibility.
    - Counseling.
    - Securing, coordinating services and obtaining Federal, State, and local benefits.
    - Documenting program participant progress.
    - Information and referrals to other providers.
    - Ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
    - Documenting an individualized housing and service plan, including planning a path to permanent housing stability.
  - Child Care Documentation:
    - Child-care provided for program participants.
    - Document meals and snacks provided.
    - Document appropriate developmental activities provided.
    - Documentation verifying the child-care center is licensed.
  - Education Services Documentation:
    - Costs of improving knowledge and basic educational skills.
    - Instruction or training in consumer education.
    - Instruction or training in health education.
    - Substance abuse prevention instruction or training.
    - Instruction or training in literacy.
    - English as a second language instruction or training.
    - General Education Development (GED) instruction or training.
    - Component services or activities such as screening, assessment, and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.
  - Employment Assistance and Job Training Documentation for:
    - Employment assistance and job training programs, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential.
    - Stipends provided to program participants in employment assistance and job training programs.

## Attachment E - ESG Program Manual

- Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
- Services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching; and
- Referrals to community resources.
- Outpatient Health Services Documentation for:
  - Direct outpatient treatment of medical conditions provided by licensed medical professionals.
- Legal services Documentation:
  - Legal advice provided.
  - Attorney is licensed and in good standing with the bar association.
  - Legal matters that interfere with the program participant's ability to obtain and retain housing. Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants.
- Life skills training Documentation for:
  - Life skills training necessary to assist the program participant to function independently in the community. (i.e., budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting).
- Mental Health Services Documentation for:
  - Direct outpatient treatment by licensed professionals of mental health conditions.
  - Substance abuse treatment services.
  - Substance abuse treatment services designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors.
  - Ensuring that treatment providers are licensed or certified professionals.
  - Outpatient treatment for up to 30 days.
  - Group and individual counseling sessions.
  - Drug testing.
- Transportation Documentation for:
  - Transportation of a program participant's travel to and from medical care, employment, childcare, or other eligible essential services facilities.
  - Program participant's travel on public transportation.
  - Program participant's use of public transportation.

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Emergency Shelter Homeless Category 3 Homeless Under Other Federal Statutes Clients

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1. Certification by the subrecipient that the individual or family does not qualify as homeless under the homeless definition but is an unaccompanied youth under 25 years of age, or homeless family with one or more children or youth, and is defined as homeless under another Federal statute:
  - Certification of homeless status by the local private nonprofit organization or state or local governmental entity responsible for administering assistance under:
    - Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.),
    - Head Start Act (42 U.S.C. 9831 et seq.),
    - Subtitle N of the Violence Against Women Act of 1994 (42 U.S.C. 14043e et seq.),
    - Section 330 of the Public Health Service Act (42 U.S.C. 254b),
    - Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.),
    - Section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786), or
    - Subtitle B of title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.); and
2. Certification of no permanent housing in last 60 days;
  - Referral by a housing or service provider,
  - Written observation by an outreach worker, or
  - Certification by the homeless individual or head of household seeking assistance; and
3. Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days immediately preceding the date of application for homeless assistance, including:
  - Recorded statements or records obtained from each owner or renter of housing, provider of shelter or housing, or social worker, case worker, or other appropriate official of a hospital or institution in which the individual or family resided; or,
  - Where these statements or records are unobtainable, a written record of the intake worker's due diligence in attempting to obtain these statements or records.
  - Where a move was due to the individual or family fleeing domestic violence, dating violence, sexual assault, or stalking, then the intake worker may alternatively obtain a written certification from the individual or head of household seeking assistance that they were fleeing that situation and that they resided at that address, and
4. Documentation of special needs or two or more barriers to employment:
  - Obtain of a written diagnosis from a professional who is licensed by the state to diagnose and treat that condition (or intake staff-recorded observation of disability that within 45 days of date of the application for assistance is confirmed by a professional who is licensed by the state to diagnose and treat that condition).
  - Two or more barriers to employment which include: employment records; department of corrections records; literacy, English proficiency tests; lack of a high

## Attachment E - ESG Program Manual

school degree or General Education Development (GED); a history of unstable employment; or document the applicant is 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,

5. Documentation of compliance with the applicable requirements for providing service and assistance (576.102) includes:
  - Case Management Documentation: Assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible.
    - Initial Evaluation.
    - Eligibility.
    - Document counseling.
    - Securing, coordinating services, and obtaining Federal, State, and local benefits.
    - Program participant progress.
    - Information and referrals to other providers.
    - Ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking.
    - Documenting an individualized housing and service plan, including planning a path to permanent housing stability.

Child Care Documentation for:

- Childcare provided for program participants
- Meals and snacks provided.
- Appropriate developmental activities provided.
- Verifying the child-care center is licensed.

Education Services Documentation for:

- Costs of improving knowledge and basic educational skills.
- Instruction or training in consumer education.
- Instruction or training in health education.
- Substance abuse prevention instruction or training.
- Instruction or training in Literacy.
- English as a second language instruction or training.
- General Education Development (GED) instruction or training.
- Component services or activities such as screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.

Employment Assistance and Job Training Documentation for:

- Employment assistance and job training programs, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential.

## Attachment E - ESG Program Manual

- Stipends provided to program participants in employment assistance and job training programs.
- Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
- Services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching.
- Referrals to community resources.

### Outpatient Health Services Documentation for:

- Direct outpatient treatment of medical conditions provided by licensed medical professionals.

### Legal services Documentation for:

- Legal advice provided.
- Ensuring the attorney is licensed and in good standing with the bar association.
- Legal matters that interfere with the program participant's ability to obtain and retain housing. Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants.

### Life skills training Documentation for:

- Life skills training necessary to assist the program participant to function independently in the community. (i.e., budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.)

### Mental health services Documentation for:

- Direct outpatient treatment by licensed professionals of mental health conditions.

### Substance Abuse Treatment Services Documentation for:

- Substance abuse treatment services designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors.
- Document the treatment providers are licensed or certified professionals.
- Outpatient treatment for up to 30 days.
- Group and individual counseling sessions.
- Drug testing.

### Transportation Documentation:

- Transportation of a program participant's travel to and from medical care, employment, childcare, or other eligible essential services facilities.
- Program participant's travel on public transportation.
- Program participant's use of public transportation.

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Emergency Shelter Homeless Category 4 Fleeing/Attempting to Flee Domestic Violence

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For Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For non-Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the care worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
2. Certification by the individual or head of household that no subsequent residence has been identified; and
3. Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.
4. Documentation of compliance with the applicable requirements for providing service and assistance (576.102) includes:
  - Case Management Documentation for:
    - Assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible.
    - Initial Evaluation.
    - Documenting eligibility.
    - Counseling .
    - Securing, coordinating services and obtaining Federal, State, and local benefits.
    - Documenting program participant progress.
    - Information and referrals to other providers.
    - Ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking.
    - Individualized housing and service plans, including planning a path to permanent housing stability.
  - Child Care Documentation for:
    - Childcare provided for program participants.
    - Meals and snacks provided.
    - Appropriate developmental activities provided.
    - Verifying the child-care center is licensed.
  - Education Services Documentation for:
    - Costs of improving knowledge and basic educational skills.
    - Instruction or training in consumer education.

## Attachment E - ESG Program Manual

- Document instruction or training in health education.
- Substance abuse prevention instruction or training.
- Instruction or training in Literacy.
- English as a second language instruction or training.
- General Education Development (GED) instruction or training.
- Document component services or activities such as screening, assessment, and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.
- Employment Assistance and Job Training Documentation for:
  - Employment assistance and job training programs, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential.
  - Stipends provided to program participants in employment assistance and job training programs.
  - Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
  - Services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching.
  - Referrals to community resources.
- Outpatient Health Services Documentation for:
  - Direct outpatient treatment of medical conditions provided by licensed medical professionals.
- Legal services Documentation for:
  - Legal advice provided.
  - Ensuring the attorney is licensed and in good standing with the bar association.
  - Legal matters that interfere with the program participant's ability to obtain and retain housing. Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants.
- Life skills training Documentation for:
  - Life skills training necessary to assist the program participant to function independently in the community. (i.e., budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting).
- Mental Health Services Documentation for:

## Attachment E - ESG Program Manual

- Direct outpatient treatment by licensed professionals of mental health conditions.
- Substance Abuse Treatment Services Documentation for:
  - Substance abuse treatment services designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors.
  - Ensuring the treatment providers are licensed or certified professionals.
  - Outpatient treatment for up to 30 days.
  - Group and individual counseling sessions
  - Document drug testing.
- Transportation Documentation for:
  - Transportation of a program participant's travel to and from medical care, employment, childcare, or other eligible essential services facilities.
  - Program participant's travel on public transportation.
  - Program participant's use of public transportation.

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### Rapid Re-Housing Category 1 Literally Homeless Clients

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1. For applicants who lack a fixed, regular, and adequate nighttime residence, meaning: car; park; abandoned building; bus or train station; airport; camping ground; or hotel and motels paid for by charitable organizations or federal, state or local government programs.
  - Written observation by the outreach worker; or
  - Written referral by another housing or service provider; or
  - Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in a shelter.
2. For an individual who is exiting an institution where he/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.
  - Written observation by the outreach worker; or
  - Written referral by another housing or service provider; or
  - Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in a shelter, and
  - Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker, or
  - Written record of intake worker's due diligence in attempting to obtain the evidence described above evidence and certification by the applicant that states he/she is exiting or has just exited an institution where he/she resided for 90 days or less.
3. Monthly case manager meeting case notes.
4. Documented individualized plan to help retain permanent housing after the ESG assistance ends.
5. Verification of Income – Not required for Rapid Re-Housing until recertification at 1-year mark.

## Attachment E - ESG Program Manual

- Rental Assistance Agreements and Payments:
  - Copies of all leases and rental assistance agreements for the provision of rental assistance.
  - Documentation of payments made to owners for the provision of rental assistance.
  - Supporting Documentation for these payments, including dates of occupancy by program participants.
- Utility Allowance:
  - Document the monthly allowance for utilities (excluding phone) used to determine compliance with the rent restriction.
- Shelter and Housing Standards:
  - Documentation of compliance with the shelter and housing standards:
  - Lead-Based Paint documentation.
  - Habitability Standards.
  - Environmental review documentation (24 CFR Part 50).
- Reassessment at one year requires:
  - Annualized Income AT OR BELOW 30% AMI.
  - Documentation as to whether persons lack sufficient resources and support networks necessary to retain the housing without assistance.

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### Rapid Re-Housing Category 4 Fleeing/Attempting to Flee DV

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#### For Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

#### For non-Victim Service Providers:

2. An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the care worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
3. Certification by the individual or head of household that no subsequent residence has been identified; and
4. Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.
  - Documentation of compliance with the applicable requirements for providing service and assistance (576.104) includes:
    - Monthly case manager meeting case notes.
    - Documented individualized plan to help retain permanent housing after the ESG assistance ends.

## Attachment E - ESG Program Manual

- Verification of Income – Not required for Rapid Re-Housing until recertification at 1-year mark.
- Rental Assistance Agreements and Payments:
  - Copy of a written lease from the landlord with the client for the of rental assistance.
  - Copy of rental assistance agreement between subrecipient and the homeowner/landlord.
  - Copy of Eviction Notice; Notice to Quit (pay rent or quit); Demand for Possession or Summons & Complaint.
  - Housing Plan.
  - Documentation of Rent Reasonableness.
  - Documentation of Fair Market Rent.
  - Documentation of payments made to owners for the provision of rental assistance.
  - Supporting Documentation for these payments, including dates of occupancy by program participants.
- Utility Allowance:
  - Document the monthly allowance for utilities (excluding phone) used to determine compliance with the rent restriction.
- Shelter and Housing Standards: Documentation of compliance with the shelter and housing standards:
  - Lead-Based Paint documentation.
  - Habitability Standards.
  - Environmental review documentation (24 CFR Part 50).
- Reassessment at one year requires:
  - Annualized Income AT OR BELOW 30% AMI.
  - Documentation as to whether persons lack sufficient resources and support networks necessary to retain the housing without assistance.

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### Homelessness Prevention Category 2 – Imminent Risk of Homelessness

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1. Document applicant is at risk of homelessness
  - A court order resulting from an eviction action notifying the individual or family that they must leave their residence within 14 days after the date of their application for homeless assistance; or the equivalent notice under applicable state law, a Notice to Quit (pay rent or quit), or a Notice to Terminate issued under state law;
  - For individuals and families whose primary nighttime residence is a hotel or motel room not paid for by charitable organizations or federal, state, or local government programs for low income individuals, - evidence that the individual or family lacks the resources

## Attachment E - ESG Program Manual

necessary to reside there for more than 14 days after the date of application for homeless assistance; or

- An oral statement by the individual or head of household that the owner or renter of the housing in which they currently reside will not allow them to stay for more than 14 days after the date of application for homeless assistance.
  - The intake worker must record the statement and certify that it was found credible.
    - To be found credible, the oral statement must either:
      - Be verified by the owner or renter of the housing in which the individual or family resides at the time of application for homeless assistance and documented by a written certification by the owner or renter or by the intake worker's recording of the owner or renter's oral statement; or
      - If the intake worker is unable to contact the owner or renter, be documented by a written certification by the intake worker of his or her due diligence in attempting to obtain the owner or renter's verification and the written certification by the individual or head of household seeking assistance that his or her statement was true and complete; and
2. Certification that no subsequent residence has been identified; and
3. Self-certification or other written documentation that the individual lacks the financial resources and support necessary to reside there for more than 14 days after the date of application for homeless prevention. Acceptable evidence includes:
- Source documents (e.g., notice of termination from employment, unemployment compensation statement, bank statement, health-care bill showing arrears, utility bill showing arrears); or
  - To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., former employer, public administrator, relative) or the written certification by the intake staff of the oral verification by the relevant third party that the applicant meets the criteria under paragraph (1)(ii) of the definition of "at risk of homelessness" in §576.2; or
  - To the extent that source documents and third-party verification are unobtainable, a written statement by the intake staff describing the efforts taken to obtain the required evidence; and
4. Documentation of one of the following conditions: To the extent that source documents and third-party verification are unobtainable, a written statement by the intake staff that the staff person has visited the applicant's residence and determined that the applicant meets one or more of the following criteria. If a visit is not practicable or relevant to the determination, a written statement by the intake staff describing the efforts taken to obtain the required evidence.
- Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

## Attachment E - ESG Program Manual

- Is living in the home of another because of economic hardship;
  - 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;
  - Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organization or by federal, State, or local government programs for low income individuals;
  - 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 people per room, as defined by the U.S. Census Bureau;
  - Is exiting a publicly funded institution or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
  - Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the grantee's approved consolidated plan.
5. Documentation of compliance with the applicable requirements for providing service and assistance (576.103) includes:
- Monthly case manager meeting case notes.
  - Documented individualized plan to help retain permanent housing after the ESG assistance ends.
  - Verification of Income (Has an annual income below 30 percent of median family income for the area, as determined by HUD at initial eligibility determination.

### **Rental Assistance Agreements and Payments:**

- Copy of a written lease from the landlord with the client for the provision of rental assistance.
- Copy of rental assistance agreement between subrecipient and the homeowner/landlord.
- Copy of Eviction Notice; Notice to Quit (pay rent or quit); Demand for Possession or Summons & Complaint.
- Housing Plan.
- Documentation of Rent Reasonableness.
- Documentation of Fair Market Rent.
- Documentation of payments made to owners for the provision of rental assistance.
- Supporting Documentation for these payments, including dates of occupancy by program participants.

### **Utility Arrearages:**

- Copy of Shut-Off Notice that is in a household member's name.

## Attachment E - ESG Program Manual

### Utility Allowance:

- Document the monthly allowance for utilities (excluding phone) used to determine compliance with the rent restriction.

### Shelter and Housing Standards: Documentation of compliance with housing standards:

- Lead-Based Paint documentation.
- Habitability Standards.
- Environmental review documentation (24 CFR Part 50).

### Reassessment every 3 months requires:

- Annualized Income AT OR BELOW 30% AMI.
- Documentation as to whether persons lack sufficient resources and support networks necessary to retain the housing without assistance.

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### Homelessness Prevention Category 3 – Homeless Under Other Federal Statutes

---

1. Certification by the subrecipient that the individual or family does not qualify as homeless under the homeless definition but is an unaccompanied youth under 25 years of age, or homeless family with one or more children or youth, and is defined as homeless under another Federal statute:
  - Certification of homeless status by the local private nonprofit organization or state or local governmental entity responsible for administering assistance under the:
    - Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.)
    - Head Start Act (42 U.S.C. 9831 et seq.)
    - Subtitle N of the Violence Against Women Act of 1994 (42 U.S.C. 14043e et seq.)
    - Section 330 of the Public Health Service Act (42 U.S.C. 254b)
    - Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.)
    - Section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786)
    - Subtitle B of title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.), and
2. Certification of no permanent housing in last 60 days;
  - Referral by a housing or service provider,
  - Written observation by an outreach worker, or
  - Certification by the homeless individual or head of household seeking assistance; and
3. Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days immediately preceding the date of application for homeless assistance, including:
  - Recorded statements or records obtained from each owner or renter of housing, provider of shelter or housing, or social worker, case worker, or other appropriate official of a hospital or institution in which the individual or family resided; or,

## Attachment E - ESG Program Manual

- Where these statements or records are unobtainable, a written record of the intake worker's due diligence in attempting to obtain these statements or records.
  - Where a move was due to the individual or family fleeing domestic violence, dating violence, sexual assault, or stalking, then the intake worker may alternatively obtain a written certification from the individual or head of household seeking assistance that they were fleeing that situation and that they resided at that address, and
4. Documentation of special needs or two or more barriers to employment:
    - Obtain of a written diagnosis from a professional who is licensed by the state to diagnose and treat that condition (or intake staff-recorded observation of disability that within 45 days of date of the application for assistance is confirmed by a professional who is licensed by the state to diagnose and treat that condition).
    - Two or more barriers to employment which include: employment records; department of corrections records; literacy, English proficiency tests; lack of a high school degree or General Education Development (GED); a history of unstable employment; or document the applicant is 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.
  5. Documentation of compliance with the applicable requirements for providing service and assistance (576.103) includes:
    - Monthly case manager meeting case notes.
    - Documented individualized plan to help retain permanent housing after the ESG assistance ends.
  6. Verification of Income (Has an annual income below 30 percent of median family income for the area, as determined by HUD at initial eligibility determination)
  7. Documentation of one or more "At Risk of Homelessness" conditions found on page 30 of the ESG Policy Manual.

### **Rental Assistance Agreements and Payments:**

- Copy of a written lease from the landlord with the client for the provision of rental assistance.
- Copy of rental assistance agreement between subrecipient and the homeowner/landlord.
- Copy of Eviction Notice; Notice to Quit (pay rent or quit); Demand for Possession or Summons & Complaint.
- Housing Plan.
- Documentation of Rent Reasonableness.
- Documentation of Fair Market Rent.
- Documentation of payments made to owners for the provision of rental assistance.
- Supporting Documentation for these payments, including dates of occupancy by program participants.

## Attachment E - ESG Program Manual

### Utility Arrearages:

- Copy of Shut-Off Notice that is in a household member's name.

### Utility Allowance:

- Document the monthly allowance for utilities (excluding phone) used to determine compliance with the rent restriction.

### Shelter and Housing Standards:

- Documentation of compliance with housing standards.
- Lead-Based Paint documentation.
- Habitability Standards.
- Environmental review documentation (24 CFR Part 50).

### Reassessment every 3 months requires:

- Annualized Income AT OR BELOW 30% AMI.
- Documentation as to whether persons lack sufficient resources and support networks necessary to retain the housing without assistance.

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### Homelessness Prevention Category 4 Fleeing/Attempting to Flee Domestic Violence

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#### For Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance which states they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker (Skip to #4 below).

#### For non-Victim Service Providers:

2. An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the care worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
3. Certification by the individual or head of household that no subsequent residence has been identified; and
4. Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.
5. Monthly case manager meeting case notes.
6. Documented individualized plan to help retain permanent housing after the ESG assistance ends.
7. Verification of Income (Has an annual income below 30 percent of median family income for the area, as determined by HUD at initial eligibility determination.
8. Documentation of one or more "At Risk of Homelessness" conditions found on page 30 of the ESG Policy Manual.

## Attachment E - ESG Program Manual

9. Documentation of compliance with the applicable requirements for providing service and assistance (576.104) includes:

### **Rental Assistance Agreements and Payments:**

- Copy of a written lease from the landlord with the client for the provision of rental assistance.
- Copy of rental assistance agreement between subrecipient and the homeowner/landlord.
- Copy of Eviction Notice; Notice to Quit (pay rent or quit); Demand for Possession or Summons & Complaint.
- Housing Plan.
- Documentation of Rent Reasonableness.
- Documentation of Fair Market Rent.
- Documentation of payments made to owners for the provision of rental assistance.
- Supporting Documentation for these payments, including dates of occupancy by program participants.

### **Utility Arrearages:**

- Copy of Shut-Off Notice that is in a household member's name.

### **Utility Allowance:**

- Document the monthly allowance for utilities (excluding phone) used to determine compliance with the rent restriction.

### **Shelter and Housing Standards:**

- Documentation of compliance with housing standards.
- Lead-Based Paint documentation.
- Habitability Standards.
- Environmental review documentation (24 CFR Part 50).

### **Reassessment every 3 months requires:**

- Annualized Income AT OR BELOW 30% AMI.
- Documentation as to whether persons lack sufficient resources and support networks necessary to retain the housing without assistance.

## Attachment E - ESG Program Manual

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### ESG and ESG-CV Invoice Claim Form Instructions

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- Top portion to be filled in by Ramsey County accountant.
- Lower portion to be fill in by subrecipient.
- Cell C42 – Contract ID, Planner assigned grant number once finalized.
- Cell B43 – Providers name.
- Cell H43 – Date of invoice.
- Cell B44 – Providers address.
- Cell A47 – Month that services were provided.
- Cell G47 – Dollar amount of Supportive Services being requested.
- Cell G48 – Dollar amount of Direct Assistance being requested.
- Cell G50 – Total claim amount.
- Cell G51 – Signature of authorized personal requesting reimbursement.

Minnesota's HMIS Data Privacy Notice

**Minnesota's HMIS Data Privacy Notice**

We collect personal information about the people we serve in a computer system called Minnesota's HMIS (Homeless Management Information System). Many social service agencies use this computer system, including street outreach, shelters, and housing programs.

**Why do we collect this information?**

- To help keep this program and others like it going. We are required to use HMIS.
- So we know how many people we serve and the types of people we serve at our agency and in the state.
- So we all understand what people need and can plan services to meet these needs.

**Who can see information that is in Minnesota's HMIS?**

- People who work for this agency will use it to help provide services to you or your family.
- Other agencies like this agency that provide services and have received permission from you to see your information. The agencies that participate in Minnesota's HMIS may change from time to time. A copy of the current list of participating agencies is available upon request.
- Auditors or funders who have legal rights to review the work of this agency, such as the U.S. Department of Housing and Urban Development and other state or local government entities.
- Organizations that run, administer, and work on the system, such as the Institute for Community Alliances or Local System Administrators. When these organizations work on the system, they may see information about you.
- People using HMIS information to do research and write reports, including, but not limited to, the Minnesota Department of Human Services (DHS). Your personally identifiable information will **never** appear in research reports.
- The law says we have to report physical or sexual abuse of children and vulnerable adults. If we think there is abuse or neglect in your household, we will report it to Child or Adult Protection.
- We may release your information to protect the health or safety of you or others as required by law.
- Others as required by law, including officials with a valid subpoena, warrant, or court order.
- We will not release your information for any other use unless you permit us in writing.

**How is your privacy protected?**

- All users of data must sign an agreement to protect your privacy and comply with state and federal laws and policies before seeing any information.
- The computer program used for this purpose has industry standard security protocols and is updated regularly to meet these security requirements.

## Attachment E - ESG Program Manual

### What are your rights?

- **If you do not want your name, social security number, or date of birth entered in HMIS, tell the intake worker.** This agency will **not** refuse to help you for denying this. However, federal and state regulations may require limited data collection for funding purposes.
- You have the right to request a copy of the Minnesota's HMIS information about you.
- You have the right to correct mistakes in HMIS information about you.
- If you think this agency or Minnesota's HMIS violated your privacy rights, you have the right to complain or appeal. Ask a staff person for a complaint and appeal form.

### Minnesota's HMIS Release of Information

#### For:

---

—

Print First, Middle, and Last Name (Complete one form for each adult)

Date of Birth

Your personal information will be collected in Minnesota's HMIS and, with your consent, shared with other service providers/homeless agencies. If you do not give permission for this agency to share your information, no other agency in the network will have access to it.

#### Why share your information?

- Sharing reduces the amount of time you have to spend answering basic questions about your situation.
- Sharing allows agencies to focus on meeting your unique needs more quickly.
- Sharing makes it easier for multiple agencies to coordinate housing and services for you and your family.

#### What information might be shared?

- Family/Household information
- Name, birthdate, Social Security Number
- Gender, race, ethnicity
- Reasons for seeking services
- Living situation and housing history
- Services you receive
- If you are homeless or not
- Your income and income sources
- Public benefits you receive
- History of domestic violence
- Educational background
- Employment information
- Military history
- Health information, including physical health, HIV, behavioral health

#### Please check ( ) a box:

- SHARE:** I consent to have the information collected about me shared through Minnesota's HMIS with other partner agencies in order to improve services to me and the services offered to others.

**Attachment E - ESG Program Manual**

**DO NOT SHARE:** I do **not** want **any** of the information about me in Minnesota’s HMIS shared with any other service providers/homeless agencies. I understand that not sharing my information may affect the ability to quickly and appropriately identify services for me.

**When you sign this form, it shows that you understand the following.**

- We will **not** deny you help if you do not want us to share your personal information. At the same time, sharing data does not guarantee that you will receive assistance.
- If you permit us to share your information, this consent is valid until canceled by you.
- If you permit us to share your information, you may change your mind and cancel this consent at any time. If you cancel this consent, your information will no longer be shared from that date forward.

\_\_\_\_\_  
\_\_\_\_\_**SIGNATURE OF CLIENT OR GUARDIAN** \_\_\_\_\_**DATE** \_\_\_\_\_**Signature of agency witness** \_\_\_\_\_**DATE**

**Please treat information about my children age 17 or younger the same as mine.**

**Verbal Consent obtained by phone (Agency Staff Signature):** \_\_\_\_\_**Date:**  
\_\_\_\_\_

**Attachment E - ESG Program Manual**

Minnesota's HMIS

Data Privacy Notice & Client Release of Information 10-01-

Client File Monitoring Checklist

<b>HUD Universal Data Elements (as of December 2019)</b>	
<i>Required of All ESG-CV Programs</i>	
3.01 Name	3.10 Project Start Date
3.02 Social Security Number	3.11 Project Exit Date
3.03 Date of Birth	3.12 Destination
3.04 Race	3.15 Relationship to Head of Household
3.05 Ethnicity	3.16 Client Location
3.06 Gender	3.20 Housing Move-in Date
3.07 Veteran Status	3.917 Prior Living Situation
3.08 Disabling Condition	

<b>Program Specific Data Elements (as of December 2019)</b>						
#	Element	Street Outreach	Emergency Shelter	Prevention	Rapid ReHousing	Coordinated Entry
4.02	Income and Sources	X	X	X	X	X
4.03	Non-Cash Benefits	X	X	X	X	X
4.04	Health Insurance	X	X	X	X	X
4.05	Physical Disability	X	X	X	X	X
4.06	Developmental Disability	X	X	X	X	X
4.07	Chronic Health Condition	X	X	X	X	X
4.08	HIV/AIDS	X	X	X	X	X

**Attachment E - ESG Program Manual**

<b>4.09</b>	Mental Health Problem	X	X	X	X	X
<b>4.10</b>	Substance Abuse	X	X	X	X	X
<b>4.11</b>	Domestic Violence	X	X	X	X	X
<b>4.12</b>	Current Living Situation	X				X
<b>4.13</b>	Date of Engagement	X				
<b>4.14</b>	Bed Night					
<b>4.19</b>	Coordinated Entry Assessment					X
<b>4.20</b>	Coordinated Entry Event					X

X = Data collection is required

## Attachment E - ESG Program Manual

### Case/Service Notes

County subrecipients must document the services provided to program participants using case notes.

Case notes must:

- Be legible and securely stored in the client file (either electronically in HMIS or comparable database),
- Sufficiently detail the services provided, including the date, time, type of service, and staff member(s) assisting,
- Spell out the client's housing plan (to leave or avoid shelter) and any goals they might have set for themselves, and
- Include any other relevant information.
- Recorded in HMIS under the case plans module.

# CITIZEN PARTICIPATION PLAN

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



**SAINT PAUL  
MINNESOTA**

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

# City of Saint Paul

## Citizen Participation Plan

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

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

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

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

The primary objectives of the Citizen Participation Plan are to:

1. Encourage citizen participation by all Saint Paul citizens in the development of the Consolidated Plan, Annual Action Plans, and CAPERs, emphasizing the involvement of low- and moderate-income residents, people living in CDBG target neighborhoods, people with disabilities, minorities, non-English speakers, and residents of assisted housing.

## Attachment F - Citizen Participation Plan

2. Give all citizens reasonable and timely access to meetings, information, and records related to the City's CDBG, HOME, and ESG programs.
3. Give all citizens the opportunity to identify and respond to proposed uses of funds.
4. Give all citizens the opportunity to review and comment on program performance.

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

### Capital Improvement Budget (CIB) Committee

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

### Public Hearings

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

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

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

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

## **Attachment F - Citizen Participation Plan**

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

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

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

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

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

The City will publish its draft Consolidated Plan and Annual Action Plans for review and comment on the City's website. The City will publish public notices in the Saint Paul City Council designated legal newspaper of general circulation describing the purpose of the Consolidated Plan and Annual Action Plans and listing the locations where the plans may be examined. The Plans will be available for review at the Department of Planning and Economic Development, on its website, and at the Saint Paul Public Library Bookmobile. Posters requesting feedback will be displayed, and written instruction for accessing an online copy

## Attachment F - Citizen Participation Plan

will be made available, at all Saint Paul public library branches and the Bookmobile (14 sites in all). Saint Paul public libraries do not require a library card to access public library computers.

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

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

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

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

- The addition of a project not described in the Consolidated Plan;
- The cancellation of a project described in the Consolidated Plan;
- An increase in the amount to be expended for a project, if the increase is greater than \$50,000 and also exceeds 25 percent of the amount originally appropriated for the project;
- A change in the location of any public improvement or public facility described in the Consolidated Plan;
- A change in any project that will affect a majority of the intended beneficiaries or a majority of the planned activities.
- A change in the Citizen Participation Plan process, in accordance with 24 CFR §91.105(c), to establish expedited procedures to draft, propose, or amended consolidated plans when necessary to expedite or facilitate the use of grant funds as allowed under the CARES Act.

If a substantial amendment is made, the City will follow all applicable HUD rules, as prescribed in the federal regulations. The City may also utilize an expedited procedure to draft, propose, or amend consolidated plans when necessary to expedite or facilitate the use

## **Attachment F - Citizen Participation Plan**

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

### Disaster Response and Recovery

On June 1, 2017, HUD issued CPD Notice 17-06, entitled *Using CPD funds for Disaster Response and Recovery*. This notice directs entitlement communities to be prepared to respond quickly to a disaster by ensuring that the possible use of federal funding for disaster response is included in the Citizen Participation Plan, the Consolidated Plan and the Annual Action Plan.

In the event of a presidentially declared disaster, any HOME, ESG, or CDBG funds reallocated to address the disaster will be considered non-substantial amendments up to the threshold of \$1,000,000.

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

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

### Access to Information and Records

Any resident, organization, or other interested party may submit written requests for information regarding the Consolidated Plan, Annual Action Plans and CAPERs, including the City's use of funds under the CDBG, HOME, and ESG programs. This Citizen Participation Plan, the Consolidated Plan, the current Annual Action Plan, the current CAPER, and any

## Attachment F - Citizen Participation Plan

substantial amendments to these plans will be available for public review at the Department of Planning and Economic Development and on its website.

### Comments, Complaints, and Appeals

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

City of Saint Paul  
Department of Planning and Economic Development  
Beth Ulrich, Grants Manager  
1100 City Hall Annex  
25 West Fourth Street  
Saint Paul, MN 55102  
(651) 266-6689  
[beth.ulrich@ci.stpaul.mn.us](mailto:beth.ulrich@ci.stpaul.mn.us)

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

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

**2023 Neighborhood Revitalization Strategy Area (NRSA) Plan  
Railroad Island Strategy Area**

*Within Payne-Phalen Neighborhood District #5 and  
Dayton's Bluff Neighborhood District #4*

City of Saint Paul  
1100 City Hall Annex  
425 West Fourth Street  
Saint Paul, MN 55102

**12/22/2023**



**SAINT PAUL  
MINNESOTA**

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



# NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)

## Railroad Island Strategy Area

*Within Payne-Phalen Neighborhood District #5 and Dayton's Bluff Neighborhood District #4*

### Table of Contents

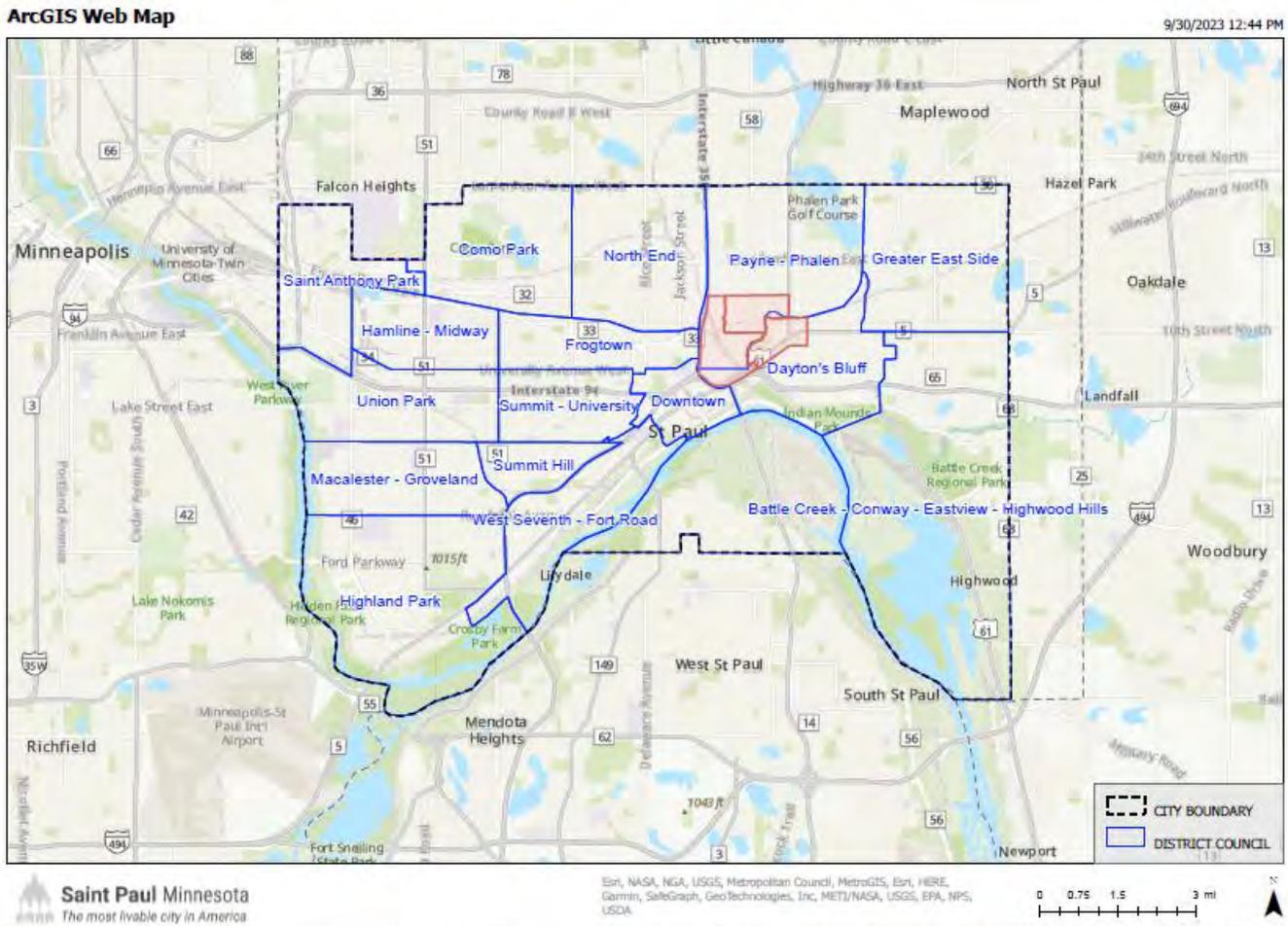
Introduction .....	3
Boundaries - Railroad Island Strategy Area .....	4
Demographic Criteria .....	5
Income CDBG-Qualified Census Tracts .....	5
Primarily Residential .....	5
Consultation .....	6
Public Meetings.....	6
Stakeholders.....	6
Railroad Island Opportunities and Performance Measurements .....	7
Leverage .....	7
Railroad Island Summary of Strategies and Opportunities Table .....	8
Assessment - Railroad Island Area .....	9
History .....	9
Railroad Island Housing and Population .....	11
Housing Market and Challenges .....	12
Economy and Employment .....	13
Historic Disinvestment and Evolving Revitalization .....	16
Transit .....	20
Transit & Streetscape Visions.....	21
Community Assets and Education .....	22
Appendix A: Acknowledgments & Neighborhood Comments.....	25
Appendix B: Railroad Island Other Opportunities Table.....	26
Appendix C: Public-HRA Property .....	32
Appendix D: 2014 Payne Avenue Improvements Maps .....	33



# Introduction

This neighborhood revitalization strategy is designed to provide tangible housing and economic improvements within 5-years in the Railroad Island community. This NRSA plan describes the Railroad Island area, its strengths and challenges and addresses each of HUD’s NRSA criteria including: Boundaries, demographic requirements, consultation, assessment, housing and economic opportunities, performance measurements, and leverage.

The Railroad Island community and adjacent Hamm’s redevelopment site is the focus of this Neighborhood Revitalization Strategy Area (NRSA) plan and is located in Saint Paul, Minnesota. The **Saint Paul Neighborhood District Map** below shows the 17 Saint Paul neighborhood districts in blue and the Railroad Island community in red.



Railroad Island includes land in two Saint Paul neighborhood districts including Payne-Phalen and Dayton’s Bluff, located in east-central Saint Paul. According to the 2020 US Census, the population in St. Paul is 311,527. Based on the 2020 US Census and MN Compass neighborhood population data, both neighborhoods are home to 52,624 residents, approximately 17% of the City of Saint Paul.

City and Neighborhood District Population		
City of Saint Paul Population	311,527	
Neighborhood District	Population	% of City
Payne-Phalen	33,644	11%
Dayton’s Bluff	18,980	6%
Total 2 Neighborhoods	52,624	17%

Source: 2020 Census, MN Compass

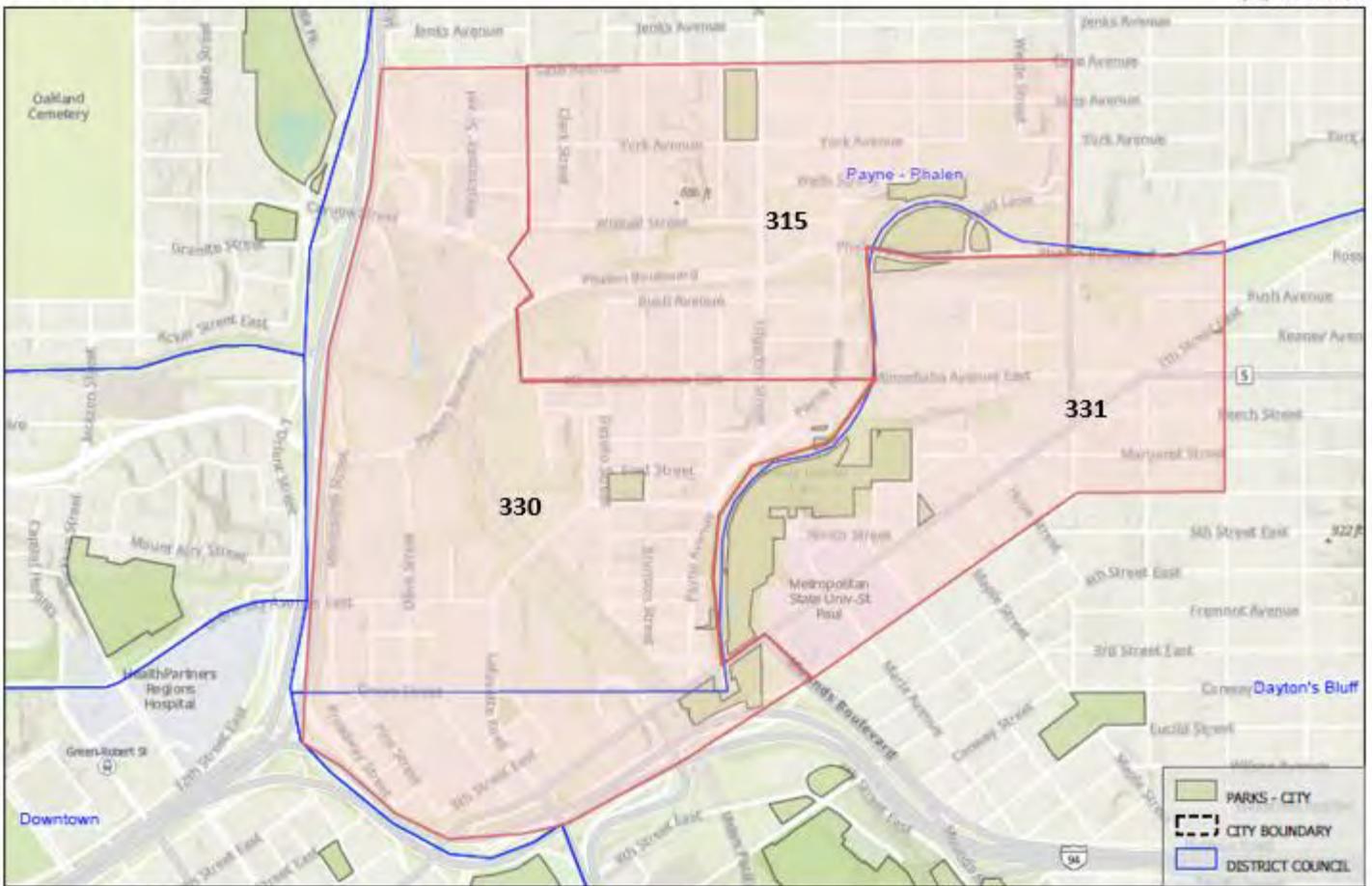


## Boundaries - Railroad Island Strategy Area

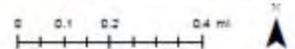
Railroad Island is located in the south end of the two east side neighborhood districts described above. The Railroad Island strategy area is shown in the **Railroad Island Boundary Census Tract Map below**. To simplify population demographic analysis, staff utilized the Census tract boundaries to delineate the Railroad Island strategy area. The three Ramsey County, MN Census Tracts include 315, 330, and 331 shown in the map below.

For the purposes of this strategy area plan, the boundaries of Railroad Island are northern Case Avenue, eastern Arcade and Forest, southern 6<sup>th</sup> Street, and western Highway 35E. The historic Railroad Island area in the center of the Census Tracts, is approximately 180 acres, bounded by railroad tracks to the north and west, Swede Hollow to the east and East 7th Street on the south. The central and northwesterly portion of the neighborhood is residential. The primary retail areas are located on Payne Avenue and Arcade. The industrial uses are concentrated along Bush Street on the north end and between Hopkins Street, 35E, and East 7th Street on the south. There is substantial open space including Swede Hollow Park, Phalen Boulevard green space, Eileen Weida Playground, the bluff and slope areas further described in the Assessment section below.

ArcGIS Web Map



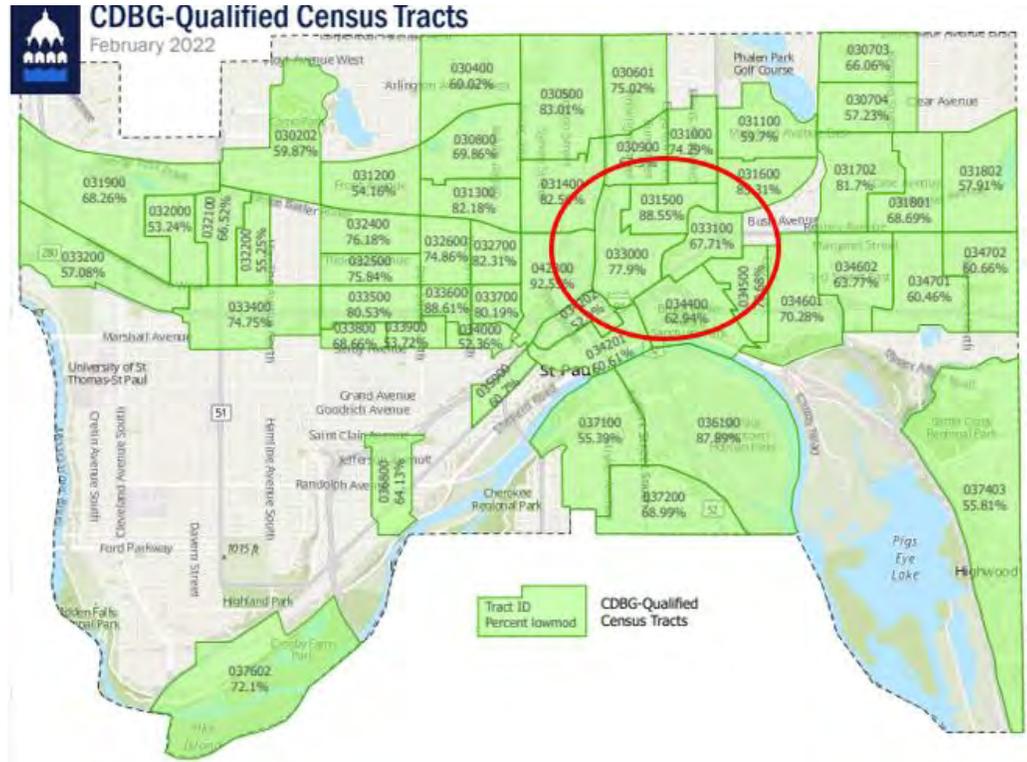
Esri, NASA, NGA, USGS, FEMA, Esri Community Maps Contributors, Metropolitan Council, MetroGIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc., MET/NASA, USGS, EPA, NPS, US Census Bureau.



## Demographic Criteria

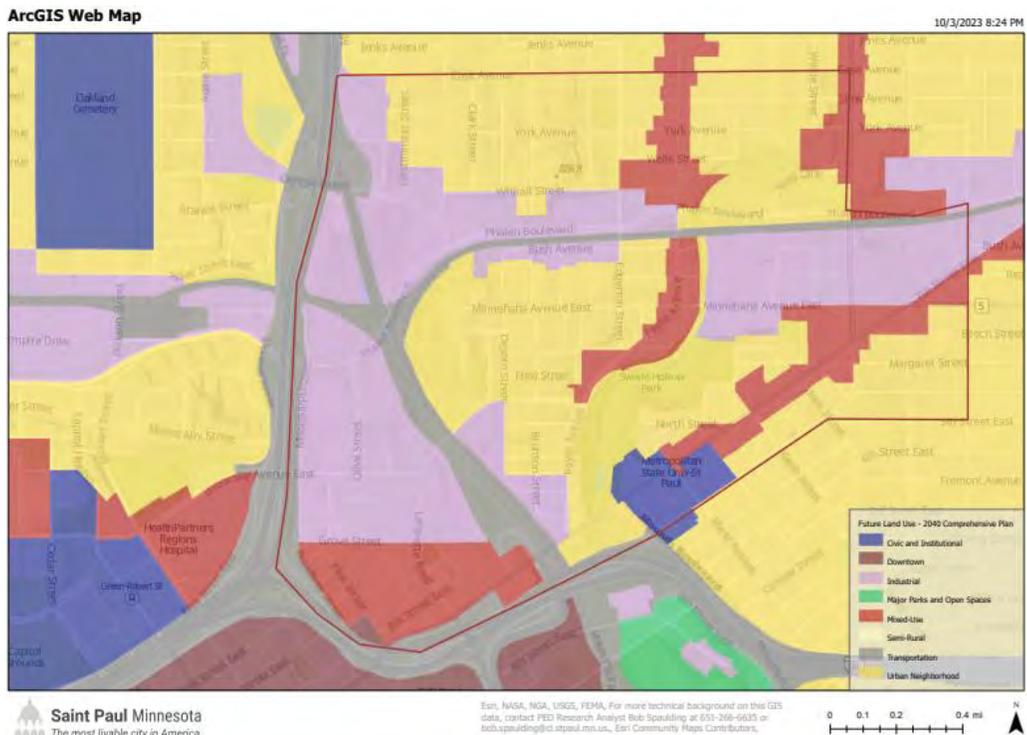
### Income CDBG-Qualified Census Tracts

The **Community Development Block Grant (CDBG)-Qualified Census Tracts 2022 Map** shows Census tracts with over 51% Low to Moderate Income (LMI) and CDBG qualified, including the Railroad Island area tracts 315, 330, and 331. The map is featured in the 2023 Saint Paul Annual Action Plan. Low-Moderate Income equals 80 percent of an area's median household income. The median household income for the Railroad Island community (Tracts 315, 330, 331) is \$46,143. Comparatively, Saint Paul's median household income is \$66,098.



### Primarily Residential

Railroad Island community is primarily residential as shown in the **Railroad Island Land Use Map**. Approximately 70% of the community is designated residential urban neighborhood or mixed use. The remaining 30% is right-of-way transportation, institutional or industrial.



## Consultation

### Public Meetings

The following list of stakeholder groups were consulted in the Neighborhood Revitalization Strategy Area (NRSA) plan process in various ways including an invitation to the neighborhood and public meetings to review the Railroad Island NRSA plan. The following meetings were held to solicit feedback on the draft NRSA plan. Staff sent the draft Railroad Island NRSA plan prior to the meetings and allowed time for the Councils and public to review the plan. A project webpage was developed on the City of Saint Paul website to share the draft plan. Comments received at the following meetings are recorded in Appendix A: Acknowledgments & Neighborhood Comments.

1. Railroad Island Neighborhood Group review meeting November 2, 2023
2. Public meeting November 20, 2023 hosted by the Dayton's Bluff Community Council District 4
3. Public meeting November 28, 2023 hosted by the Payne-Phalen Community Council District 5
4. Virtual public hearing November 30, 2023 during 30-day comment period (November 20- December 21, 2023)

### Stakeholders

Redevelopment projects in Railroad Island have been resident led, planned for and developed in concert with Railroad Island's residents, through the following stakeholder groups. The following inventory of stakeholders was used to build a contact list for notification of the public meetings and soliciting feedback on the draft NRSA plan. Initial research was conducted to gather contact information and visit the websites of the stakeholder groups listed below. Existing plans such as the Saint Paul Consolidated Plan 2020-2024 and program materials were reviewed to compile the following list of key stakeholders and neighborhood groups that notified community residents and leaders.

#### Local non-profits and community-based organizations

- I. [Railroad Island Neighborhood Group](#) – Consultation October 5, 2023
- II. [Payne-Phalen Community Council District 5](#) – Consultation September 26, 2023
- III. [Dayton's Bluff Community Council District 4](#) – Consultation November 13, 2023

#### Community Development Corporations (CDCs), Finance Institutions (CDFIs), and Organizations

- I. [Daytons Bluff Neighborhood Housing Services](#) - Consultation August 18, 2023
- II. [East Side Neighborhood Development Company](#) – Consultations July 5, 2023, October 2023

#### Government entities

- I. [Saint Paul City Council](#) – Wards 2, 5, 6, and 7
- II. [City of Saint Paul Planning and Economic Development Department](#) – Staff drafted this NRSA





## Railroad Island Opportunities and Performance Measurements

As stated in the Introduction, the purpose of this Neighborhood Revitalization Strategy Area (NRSA) plan is to provide tangible housing and economic improvements within 5-years in the Railroad Island community. Furthermore, this NRSA is designed to promote the area's economic progress. The progress focuses on activities that benefit low- and moderate-income persons by increasing affordable housing opportunities and expanding economic opportunities through activities that promote the substantial revitalization of the Railroad Island neighborhood.

As stated in the previous sections, Railroad Island community has a history of planning efforts in response to the historic disinvestment and evolving revitalization. Most of the opportunities listed below were drawn from previous plans and applications to continue the improvement and stabilization of the Railroad Island neighborhood.

The **Railroad Island Summary Opportunities Table** below and performance measures identify the results expected to be achieved. A full list of all plan goals is in **Appendix B: Railroad Island Other Opportunities Table**. The opportunities (goals, objectives, outcomes) and measures include physical improvements and social initiatives to improve affordable housing and economic progress stated in terms of measurable outputs and outcomes tied to the neighborhood's identified needs. The **Railroad Island Opportunities Tables** below identify housing and economic opportunities that can be measured and used to determine progress made.

### Leverage

Community Development Block Grant (CDBG) funding is the primary leverage tool resourced through this plan. The City of Saint Paul will identify benefit amounts for the Railroad Island and Hamm's redevelopment site area in the 2024-2025 Capital Improvement budget not yet finalized at the time of this plan development. Neighborhood organizations including Dayton's Bluff Neighborhood Housing Services and East Side Neighborhood Development Company have existing CDBG contracts and have applied for funding for the next cycle next cycle through the 2024 [Capital Improvement Budget](#).

Leverage is a critical element of neighborhood revitalization and a goal of this NRS is to attract additional investment to Railroad Island community. As stated in the Saint Paul Action Plan (2023-2024), the City has identified State, local, and private resources expected to be available to leverage and/or match HUD funding to address priority needs and the objectives put forward in the Strategic Plan and this NRS for Railroad Island. These resources may include:

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



Railroad Island Summary of Strategies and Opportunities Table

The following strategies and opportunities are consistent with Neighborhood Revitalization Strategy Area (NRSA) guidance from Housing and Urban Development (HUD) and the City's Consolidated Plan. The metrics will be reported in the City's annual Consolidated Annual Performance and Evaluation Report (CAPER).

	Goal, Strategy, Opportunity	Status	Target Date	Cost/	Performance Measure
				Funding/	
				Leverage	
<b>Housing (H)</b>					
1	Increase in homeownership rates	Ongoing	Ongoing		LMI households assisted, ownership rate comparison
2	Reduction in vacancy rates	Ongoing	Ongoing		Vacancy rate comparison
3	Increase in housing values with new construction housing units – Rivoli neighborhood units	Ongoing	Ongoing		Housing value comparison, # new units
4	Remove or rehabilitate blighted housing – Neighborhood purchase through county tax forfeit (See Appendix C: City Public-HRA Property Maps)	Ongoing	Ongoing		Blighted housing removed or Housing rehabilitation and infill - #s
5	LMI households assisted through housing rehabilitation and ownership programs	Ongoing	Ongoing		# LMI households assisted;
<b>Economic Development Individual Income (EDII)</b>					
6	New businesses assisted	Ongoing	Ongoing		# new businesses assisted
7	Existing businesses assisted	Ongoing	Ongoing		# existing businesses assisted
8	Jobs created or retained in area	Ongoing	Ongoing		# jobs created or retained in area
9	Remediate brownfields	Ongoing	Ongoing		Acres of brownfields remediated;
10	Business facades/buildings rehabilitated – Former Hamm’s Brewery redevelopment	Ongoing	Ongoing		business facades/buildings rehabilitated

## Assessment - Railroad Island Area

### History

#### Early Saint Paul History

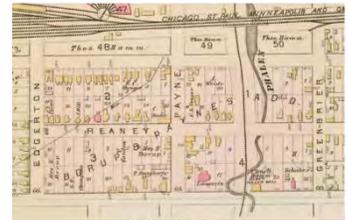
Burial mounds in present-day Mounds Park suggest the Saint Paul area was inhabited by the Hopewell Native Americans about 2,000 years ago. From the early 17th century to 1837, the Mdewakanton Dakota, a tribe of the Sioux, lived near the mounds.<sup>1</sup>

#### Railroad Island History

In 1847, the first Railroad Island plat was developed in lower Payne Avenue area, named Brunson's Addition (**Brunson house and Brunson's Addition pictured right**). The neighborhood had pleasing views of Trout Brook, Phalen Creek and downtown, because no railroads had yet cut through the area. The area is approximately 180 acres in size and is bounded by railroad tracks on the north and west, Swede Hollow Park on the east and East 7th Street on the south. Railroad Island was one of a few early neighborhoods that developed just outside downtown Saint Paul in the 1850's. Initially it attracted fairly prosperous residents who liked the views of Trout Brook to the west. As a result, many Victorian houses were built in the area in the late nineteenth century on Burr, Brunson, Minnehaha, and Desoto.



With the arrival of railroads, with noise and smoke, many people decided to move to newer areas in the western part of the city. The encirclement of the neighborhood by several railroads is where it got its name. As the elite left, the community slowly developed into a blue collar area. Historically, the majority of the housing in Railroad Island was single-family and owner-occupied. A major influx of Italian immigrants came to Railroad Island around 1910, many from the Benevento region of Italy, near Naples. Numerous Italian restaurants and other specialty shops were developed in lower Payne Avenue.



The **Francis M. Williams House (pictured right)** at 656 Bush Avenue is on the Architecturally Historic Properties listing in St. Paul, RA SPC 0460. Francis M. Williams born 1858 in Minnesota, the son of David and Cynthia Williams both early pioneer farmers to the territory came to Minnesota in 1856. Francis and his brother moved to St. Paul in circa 1870. Francis purchased 5 adjoining (lots 6-10) in 1880 and built his home on Lot 10 Block 1 of Borup and Paynes Addition to St Paul in 1884 overlooking Swede Hollow. The original address was 656 Fauquier Street that was later changed to Bush Avenue in honor of a 3M executive.



Railroad Island's past is linked to its present with its continued cultural diversity and wealth of opportunity. Employment losses have led to economic and social instability in the neighborhood. Owner-occupied housing slowly converted to rental units which generally has resulted in a lower level of maintenance of the neighborhood's housing. However, there are still many homeowners who savor the historic homes in the area. The importance of conserving historic buildings is an ongoing debate in the community. In some cases historic structures are abandoned and are potential fire and safety hazards. The cost of rehabilitation and the desire to preserve historical and cultural heritage are competing interests that affect area revitalization efforts. The Railroad Island area is defined by its past struggles and has a need to be resourced through investment capital.<sup>2</sup>

<sup>1</sup> Early Saint Paul history sources: Trimble, Steve (July 2, 2000). "A short history of indian mounds park". Neighborhood Pride Celebration, and Kunz, Virginia Brainard (1991). Saint Paul - The First 150 Years. The Saint Paul Foundation.

<sup>2</sup> Railroad Island history sources: Saint Paul Historical online: <https://saintpaulhistorical.com/items/show/292> and Damian Schaab, historian and neighborhood resident.

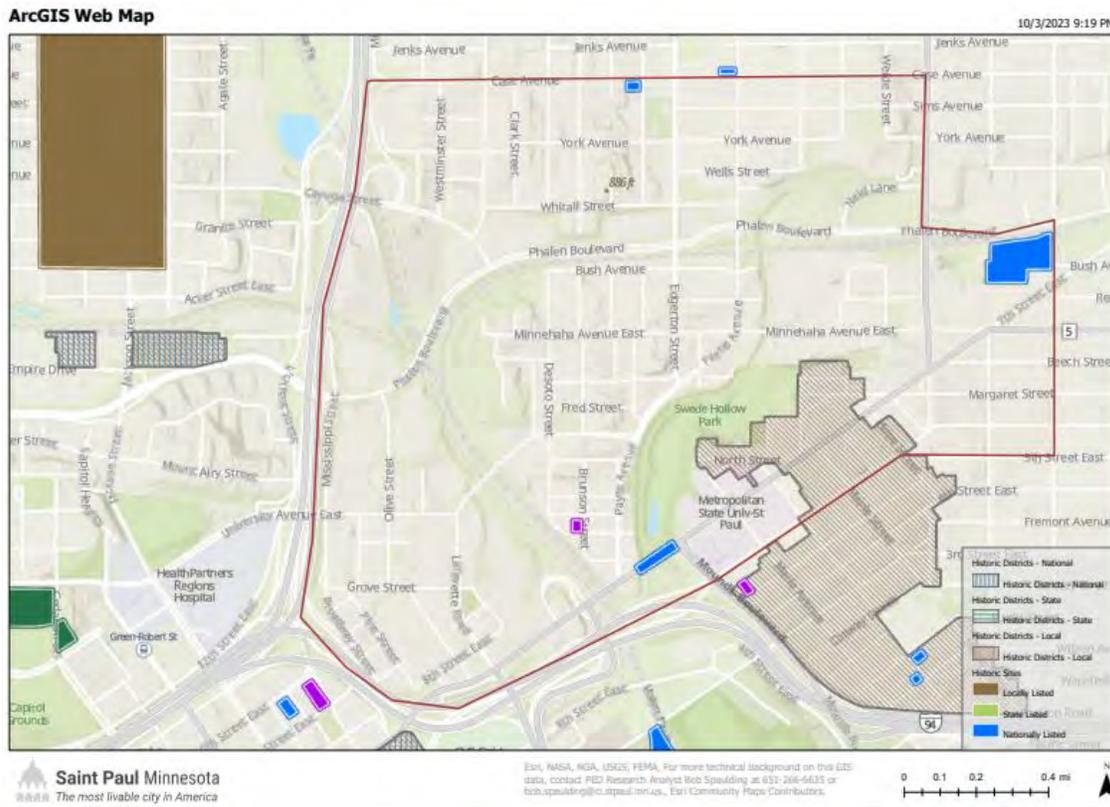


**Historic District and Sites**

Railroad Island area and neighboring downtown Saint Paul is rich with historic sites and districts shown in the **Historic Districts and Sites Map** below. The Dayton’s Bluff Historic District is partially within the Railroad Island community in the southeast corner illustrated in brown crosshatch. The Dayton’s Bluff Historic District was approved by the City Council in 1992. The creation of the Historic District recognizes the historical, natural, and architectural significance of the neighborhood. Dayton’s Bluff is the name given to a towering limestone outcrop in the wide valley of Mississippi River in Saint Paul. The bluff is one of Saint Paul’s most prominent geographic features.

Many of the streets in the district were oriented toward views of the Mississippi River and the city below. As the blocks of Dayton’s Bluff were developed with diverse residential and commercial building styles, the steep, rolling terrain was retained. Historic homes still stand on hilltop sites with porches and prominent windows oriented towards views of the distant river bluffs. The Historic District boundaries include I-94 on the southwest and the northwest is bound by Swede Hollow ravine and the edge of the bluff.

- Historic Sites
  - Locally Listed
  - State Listed
  - Nationally Listed
  - Locally and State Listed
  - Locally and Nationally Listed
  - State and Nationally Listed
  - Local, State, and Nationally Listed
- Historic Districts - Local
  - Historic Districts - Local
- Historic Districts - State
  - Historic Districts - State
- Historic Districts - National
  - Historic Districts - National



It is important to conserve the historic buildings of this area, but the natural setting should also be conserved and enhanced. The first settlers of the area who sought large lots perched near the edge of the bluff highly valued their special view of the city. Today, the broad vistas of the river and downtown St. Paul remain among the reasons new residents are drawn to this unique neighborhood.

Exterior alterations, new construction, and demolition of buildings within the District boundaries are reviewed by the St. Paul Heritage Preservation Commission according to the guidelines explained in a Historical District Handbook. The Handbook is intended for the use of residents of the Dayton’s Bluff Historic District, as well as all other St. Paul residents with an interest in the conservation of historic buildings. Source: Dayton’s Bluff Community Council



## Railroad Island Housing and Population

The following table shows Railroad Island area housing and population demographic comparison of 2010-2020. Sources of the following Railroad Island demographic trends were gathered from US Census 2020, ACS 2021 estimates, and 2010 Census data from a 2014 report titled "Hawthorne Ecovillage and Railroad Island: A Comparative Analysis". The 2010 data may have been calculated with a slightly smaller, two tract area as compared to the 2020 three tract data. Demographic trends revealed with the 2010-2020 Census 3-tract data comparison include the following findings.

1. Population in Railroad Island community grew 343 persons from 2010 (6,933) to 2020 (7,276)
2. Median age has decreased by 1 year from 2010 to 2020 (29)
3. Median income increased by \$2,086
4. Housing units increased 647 units
5. Persons per household increased slightly from 3.24 to 3.28
6. Vacant housing units decreased -7%
7. Rental housing units decreased -20%
8. Owner housing units increased 21%
9. Percent below poverty decreased -7%
10. Racial changes include a decrease in Caucasian, decrease in African American, and increase in Asian

<b>Railroad Island Area</b>						
<b>Demographic</b>	<b>2010 Report</b>	<b>2010 3 Tract</b>	<b>2020 3 Tract</b>	<b>Report Change</b>	<b>Census Change</b>	
<b>Population</b>	5,095	6,933	7,276	2,181	343	
<b>Median Age</b>	28.1	30.5	29.60	1.50	-1	
<b>Median Income</b>	\$29,080	\$44,057	\$46,143	\$17,063	2,086	
<b>Housing</b>						
<b>Housing Units</b>	1,326	1,574	2,221	895	647	
<b>Persons per household</b>		3.24	3.28		0.04	
<b>Housing vacant units</b>	27%	14%	7%	-20.0%	-7%	
<b>Housing rental units</b>	46.9%	66%	46%	-0.9%	-20%	
<b>Housing owner units</b>	37.8%	33%	54%	16.2%	21%	
<b>Poverty</b>						
<b>Below Poverty</b>		33.7%	27.2%		-7%	
<b>Race</b>						
<b>White alone</b>	35%	37%	33%	-2%	-5%	
<b>Black or African American alone</b>	29%	30%	26%	-3%	-4%	
<b>American Indian and Alaska Native alone</b>	na	2%	2%		0%	
<b>Asian alone</b>	23%	26%	30%	7%	5%	
<b>Native Hawaiian &amp; Othr Pacific Islander alone</b>	na	0%	0%		0%	
<b>Some Other Race alone</b>	13%	0%	8%	-5%	8%	
<b>Population of two or more races</b>	na	5%	1%		-4%	
Source: 2020 US Census, 2021 ACS Estimates (Tracts 315,330,331), 2010 Census (Tracts 315,330,331), and 2010 data report Hawthorne Ecovillage and Railroad Island: A Comparative Analysis'						



## Housing Market and Challenges

Railroad Island neighborhood is mostly residential and improving the housing stock is the number one goal of many redevelopment efforts in Railroad Island. Homes consist of a mixture of historic, large, Victorian style houses of varying maintenance, revitalized houses, and new construction homes (See photos below).

## Housing Occupancy and Tenure

The table shows 2010 and 2020 housing unit occupancy and tenure. The data reveals that the number of rental units in the Railroad Island neighborhood decreased (-20%) from 2010-2020. Housing vacancy rate decreased (-7%).

Railroad Island Area (Census Tracts 315,330, 331)			
Demographic	2010	2020	Change
Housing Units	1,574	2,221	647
Housing vacant units	14%	7%	-7%
Housing rental units	66%	46%	-20%
Housing owner units	33%	54%	21%

Sources: 2010, 2020 US Census

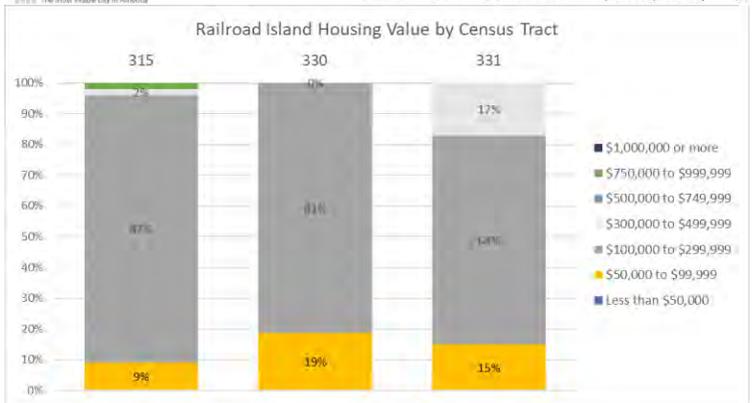
## Housing Age

Most homes were built prior to 1940 shown in the Structure Year Built Map right, illustrated in pink, purple and blue. With most housing over 80 years old and 46% rental housing units; maintenance and stability are the critical housing challenges facing the community. In 2005, Dayton’s Bluff Neighborhood Housing Services conducted a housing condition survey for Railroad Island that revealed 88% of its residential structures need some type of repair. This highlights the critical need for extensive housing rehabilitation for the area. The topography of Railroad Island is another challenge that requires increased housing costs for retaining walls and level foundations.



## Housing Value

The housing value for occupied housing units, in the 3-Census Tract Railroad Island Area is primarily \$100,000-\$300,000 shown in the graph right as follows: Tract 315 (87%), Tract 330 (81%), and Tract 331 (68%). Tract 331 contains 17% of housing units valued between \$300,000 to \$499,999. The average median housing unit value of all 3-Census Tracts is \$160,667.





## Economy and Employment

The Railroad Island and east side neighborhoods have experienced many employment changes that have shaped the economy and character of the community listed below (Source: Previous plans, list on page 12). Despite the challenges, existing businesses provide an economic base and revitalization initiatives continue to improve the economy in the Railroad Island community.

In December 2023, a total of 440 businesses were registered active within the 3 Census tracts that form the Railroad Island strategy area. Of the total number, 365 are small-businesses that have up to 5 employees. The table right shows the number of businesses in the Railroad Island area categorized by the number of employees.

#Employees	# Businesses
0 to 5 employees	365
6 to 50 employees	41
51 to 200 employees	7
201 to 500 employees	1
Over 500 employees	1
<i>Sub-total</i>	<i>415</i>
No Answer Provided	25
<b>Total</b>	<b>440</b>

*Source: City of Saint Paul*

## Changes and Challenges

1. Loss of major employers including: Hamm’s (later Stroh’s) brewery, 3M company, Whirlpool
2. Metropolitan State University located at the old St. John’s Hospital site
3. 2018 **Beacon Bluff Industrial Spec development - Former 3M site (Pictured right)**
4. Additions of the Mexican Consulate, CLUES, **Cookie Cart Youth employment (Pictured right)** and several vibrant immigrant businesses to the neighborhood.
5. Creation of nearby Dayton’s Bluff historic district
6. Redevelopment plans for former Hamms Brewery Site



## Existing Businesses

Railroad Island existing businesses attract patrons, provide employment opportunities, and contribute to a vibrant community. Several of the businesses listed below reflect the neighborhood’s historic roots. The long-standing businesses provide a solid foundation to grow the Railroad Island economy.

**Morelli’s Alimentari (Pictured right bottom)**, an Italian grocer located at the busy intersection of Payne and Tedesco. Morelli’s has been open since Railroad Island attracted Italian immigrant families in the early part of the 20th Century. Yarusso Bros., another Italian standard from the 1930s is still owned by the Yarusso family. The Statue of Liberty lights the way inside for evening visitors.



Brunson’s Pub on Payne Avenue is named after a longtime neighborhood resident and land surveyor of St. Paul. He built and lived in a house which is believed to be the oldest standing brick house in St. Paul, in Railroad Island.

Payne Avenue restaurants and markets within the neighborhood and nearby: La Palma Supermercado, East Side Pizza, Magnolia’s, Eastside Thai, Mangos Mexican, Tongue in Cheek, Santa Fe, Caydence Records & Coffee, Karibu Grocery & Deli.





**Major Employers**

The list of major employers below records the top 50 registered active businesses with over 6 employees in the Railroad Island area as of December 2023. Approximately 440 employers are located within the Railroad Island strategy area in the 3 focus Census tracts. The following list shows the top 50 employers in the strategy area in 4 categories including: 6-50 employees, 51-200 employees, 201-500 employees, Over 500 employees.

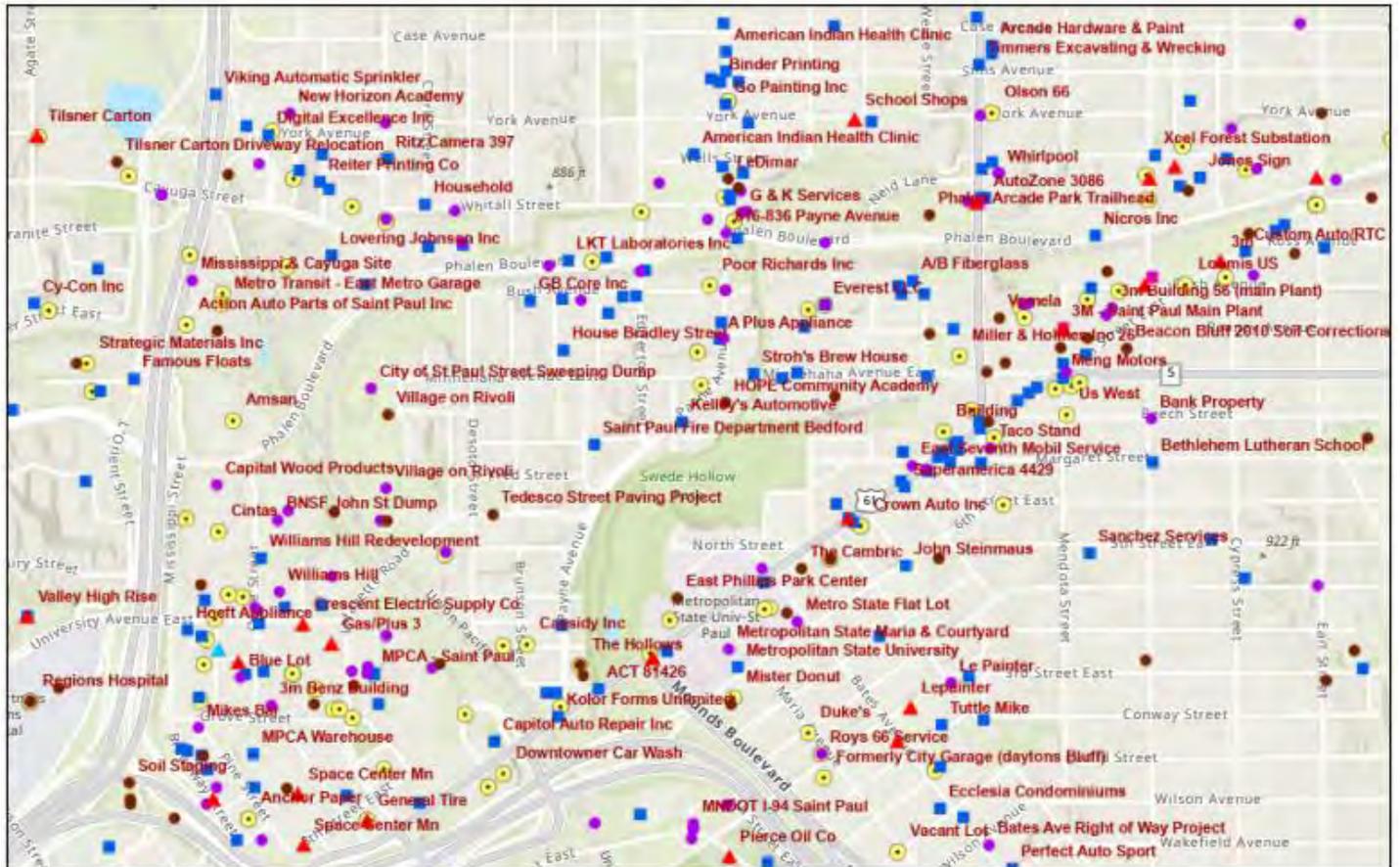
<b>Railroad Island Major Employers</b>		
	<b>Minnesota Business Name</b>	<b>Number Employees</b>
1	Advantage Plus, L.L.C.	Over 500 employees
2	Culture Home Healthcare Incorporated	201 to 500 employees
3	Anchor Paper Company	51 to 200 employees
4	CLUES Real Estate Holding Company	51 to 200 employees
5	Comunidades Latinas Unidas En Servicio, Inc.	51 to 200 employees
6	Good vibes African Markets/deli LLC	51 to 200 employees
7	Hope Community Academy	51 to 200 employees
8	Medical Graphics Corporation	51 to 200 employees
9	Total Life Security	51 to 200 employees
10	American Indian Family Center	6 to 50 employees
11	Artistic Reflections	6 to 50 employees
12	Big Wood Timber Frames, Inc.	6 to 50 employees
13	Birch Tree Care	6 to 50 employees
14	Boots On The Ground LLC	6 to 50 employees
15	Capital Wood Products Company	6 to 50 employees
16	Carbone Pizza, Inc.	6 to 50 employees
17	Carpenters Training Institute	6 to 50 employees
18	Caztek Engineering	6 to 50 employees
19	CentroMex. Supermercado	6 to 50 employees
20	East 7th Liquor, L.L.C.	6 to 50 employees
21	Eastside Thai Restaurant INC	6 to 50 employees
22	EIDS Cleaning & Consulting LLC	6 to 50 employees
23	ENOC Construction L. L. C.	6 to 50 employees
24	Far East Inc	6 to 50 employees
25	Glo Airtech	6 to 50 employees
26	Green House Recovery Center	6 to 50 employees
27	Heinz Law PLLC	6 to 50 employees
28	Higher Power Society	6 to 50 employees
29	Home Care Givers, Inc	6 to 50 employees
30	Insitu Technologies, Inc.	6 to 50 employees
31	La Primicia LLC	6 to 50 employees
32	Laservision USA, LP	6 to 50 employees
33	Latino Economic Development Center	6 to 50 employees
34	Listening House of St. Paul, Incorporated	6 to 50 employees
35	LKT Laboratories, INC.	6 to 50 employees
36	Medi-Tech Communications, Inc.	6 to 50 employees
37	National Chevy Association Inc.	6 to 50 employees
38	Ndop Humanitarian Relief Fund P. A.	6 to 50 employees
39	Nivon Wellness Center LLC	6 to 50 employees
40	North American Art and Mirror	6 to 50 employees
41	Oceans Home Care	6 to 50 employees
42	Phi Chay Thai Cuisine of MN Corporation	6 to 50 employees
43	Postma Air, LLC	6 to 50 employees
44	Princes Travel Services	6 to 50 employees
45	Quick Stop Market Inc.	6 to 50 employees
46	Rana Assets & National Acquisitions Corp	6 to 50 employees
47	Taqueria Los Ocampo 2, Inc.	6 to 50 employees
48	The Robinson Group, Inc.	6 to 50 employees
49	USA F, Inc.	6 to 50 employees
50	Windy's Collision Center, Inc.	6 to 50 employees



**Brownfield Redevelopment**

The Railroad Island community and surrounding neighborhoods have several brownfield redevelopment opportunities. The **MPCA Sites map** below shows identified Minnesota Pollution Control Agency (MPCA) sites in the vicinity. Categorical types of brownfields shown in the map include: Multiple Programs, Air Quality, Hazardous Waste, Investigation and Cleanup, Stormwater, Tanks, and Water Quality.

MPCA Sites



11/11/2023, 9:45:52 AM  
 program  
 Multiple Programs  
 Air Quality  
 Hazardous Waste  
 Investigation and Cleanup  
 Stormwater  
 Tanks  
 Water Quality

1:18,056  
 0 0.1 0.2 0.4 mi  
 0 0.17 0.35 0.7 km

MPCA, Esri, NASA, NGA, USGS, FEMA, Esri Community Maps Contributors, Metropolitan Council, MetroGIS, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, MET/NASA, USGS, EPA, NPS, US Census Bureau, USDA | Esri, NASA, NGA, USGS

As shown in the map, most sites are hazardous waste and investigation and cleanup. One strategy listed in the Summary Opportunities table in this NRSA is Brownfield remediation. The Railroad Island community and adjacent Hamm’s Brewery site have engaged in many clean-up and remediation efforts in the past. Examples include the construction of Phalen Boulevard Parkway that replaced two junk yards and a solid waste transfer station.

**Water Services Program**

In early 2022, the City of Saint Paul announced it would spend \$14.5 million over a two-year span to remove lead drinking water pipes from private property. At the time of the announcement, Water Services estimated that as many as 26,600 St. Paul homes may have lead water service pipes (Star Tribune, Walsh, March 28, 2022). The city of St. Paul has [a map that allows property owners to look up their homes](#) to see whether they have lead water pipes. Anyone in St. Paul who has immediate concern about lead is urged contact Water Services at 651-266-6350 and request a lead testing kit.



## Historic Disinvestment and Evolving Revitalization

Compared to the surrounding neighborhoods in Saint Paul, Railroad Island shows signs of poverty and disinvestment. Many residents are low-moderate income and the housing stock includes some un-maintained properties. The current status of Railroad Island in comparison to City of Saint Paul is shown in the Census 2020 comparison table below.

### Comparison Highlights:

1. Median household income lower in Railroad Island (\$46,143) versus Saint Paul (\$66,098)
2. Persons per household in Railroad Island is higher (3.28) than Saint Paul (2.40)
3. Median Age is higher in Saint Paul (32.5) than Railroad Island (29.6)
4. Percent housing rental units are slightly higher in Saint Paul (49%) than Railroad Island (46%)
5. Racial mix is more diverse in Railroad Island than Saint Paul

Railroad Island Area (Tracts 315,330,331) Compared to Saint Paul - 2020 Census			
Demographic	Saint Paul	RRI	Difference
	<b>Higher</b>		
Population	305,877	7,276	--
Median Age	32.5	29.6	2.9
Median Income	\$66,098	\$46,143	\$19,955
Housing Units	127,392	2221	--
Persons per household	2.40	3.28	0.87
Housing vacant units	10%	7%	
Housing rental units	49%	46%	3%
Housing owner units	51%	54%	3%
Race			
White alone	51%	33%	18%
Black or African American alone	17%	26%	9%
American Indian and Alaska Native alone	1%	2%	1%
Asian alone	19%	30%	11%
Native Hawaiian & Othr Pacific Islander alone	0%	0%	0%
Some Other Race alone	5%	8%	3%
Population of two or more races:	8%	1%	7%

Source: 2020 US Census, 2021 ACS Estimates

### Railroad Island Plans

Railroad Island has been the subject or mentioned in several neighborhood plans listed right. The plans have led to several revitalization actions and positive change in the community further described below in the revitalization section.

Plans contain recommended goals and strategies in housing, infrastructure, economic, and social improvements. Focused community planning and dedicated residents and organizations have improved the Railroad Island neighborhood.

The redevelopment of Railroad Island has been resident led and resident empowering. For example, a local real estate partner, ABC Realty, has a mission to address the racial homeownership gap. They market DBNHS' houses to BIPOC households, on an ongoing basis. The urban green space, created in Village on Rivoli, described below, and the youth training the site supports, helps to address neighborhood youth employment challenges, while creating a place for all of Railroad Island residents to use collectively.

### Railroad Island Plans

1. [Railroad Island Small Area Plan \(1994\)](#)
2. [Phalen Corridor Development Strategy \(2001\)](#)
3. [Railroad Island Master Plan Report \(2002\)](#)
4. [Phalen Corridor Middle Section Amendment \(2004\)](#)
5. [Hamm's Brewery Reuse Study and Vision Plan \(July 2004\)](#)
6. [Northeast Corridor Development Plan \(2005\)](#)
7. [2005 Railroad Island Housing Condition Survey](#)
8. [Phalen Corridor Atlantic Amendment \(2006\)](#)
9. [Railroad Island Updated Area Plan \(2007\)](#)
10. [Dayton's Bluff District Plan \(2009\)](#)
11. [The Beacon Bluff \(3M site\) Development Concepts \(2009\)](#)
12. [Near East Side Roadmap \(2012\)](#)
13. [Eco-Village Railroad Island Comparative Analysis \(2014\)](#)
14. [Payne Avenue Street Improvements \(2014\)](#)
15. [Francis-M.-Williams-House history report](#)
16. [On Railroad Island article, Minn Post \(2013\)](#)
17. [Swede Hallow Park Master Plan \(2019\)](#)
18. [Railroad Island a Hopeful Future](#)



## Recent Revitalization

Ongoing and recent revitalization activities have been taking place in the Railroad Island neighborhood and in the periphery communities for over two-decades. The reinvestment has provided vibrant hope in the community with need still evident in the assessment above. Since the original Small Area Plan for Railroad Island was approved in 1994, positive changes have occurred on Railroad Island including the following highlights.

1. Hope Community Academy, a charter school, moved into the Hamm's Brewery administration building, and recently completed an expansion of their facility
2. Hamm's Site initiatives: 2004 Reuse plan, Stroh's Brewery, community offices, more information below
3. Brownstones of Swede Hollow were built and are now more than 50% occupied by residents who were attracted to this area from other parts of the Twin Cities
4. Yarusso's Italian Restaurant recently completed a renovation and expansion
5. Small business center was built at the intersection of Hopkins and Payne
6. Full-service grocery store, La Palma Supermercado, opened in 2005
7. **Phalen Boulevard** was completed and pedestrian and bicycle trail connections improved **(Pictured Right)**
8. Nearby Bruce Vento Nature Sanctuary opened
9. Many blighting influences that had negative effects on property values, have been removed
10. A large slag heap has been replaced with the Williams Hill Business Center
11. Two junk yards and a solid waste transfer station have been replaced by Phalen Boulevard Parkway, and **Westminster Junction Business Center (Pictured Right)**
12. December 2021, City of Saint Paul established the 30% AMI Deeply [Affordable Housing Fund](#) to invest \$37.5 million into increasing the supply of housing affordable to those at or below 30% of the Area Median Income, utilizing American Rescue Plan Act State and Local Fiscal Recovery Funds.



Railroad Island neighborhood has experienced recent revitalization however, there is still economic and housing needs. By taking action in several key areas, the community can become a more vibrant neighborhood that attracts new residents and encourages current residents take pride in the area, improve their properties and become involved in the community. To move to the next level, strategies and goals have been identified in the opportunities section of this plan.

## Housing Investment

Railroad Island is the closest East Side neighborhood to downtown. The desire to live close to the downtown area has helped to spur housing redevelopment efforts in the Railroad Island community. Over the last decade, the City has worked with Dayton's Bluff Neighborhood Housing Service (DBNHS) in developing and rehabilitating over 40 units of ownership housing. The new homes are affordable to a range of income levels, and 51% of the homes are owned and occupied by people at or below 80% of the area's median income.



## 2023 Village on Rivoli Status (Pictured Right)

The Village on Rivoli is part of the larger Railroad Island Housing Initiative. The goal of the Initiative is to build and sell 100 new ownership housing units in St. Paul's Railroad Island neighborhood. Since the Initiative began, DBNHS has completed and sold 55 new ownership units in Railroad Island. The Village on Rivoli Pocket Neighborhood consists of 17 lots surrounding a common area greenspace and is in the third phase. When the Village on Rivoli is completed it will consist of 38 single family homes. Neighborhood plans to build housing on this site go back nearly 40 years. The Village on Rivoli site was once a contaminated wasteland. The revitalization can be attributed to the perseverance, over many decades, of the Railroad Island residents and DBNHS' resident Board members. Recommended housing strategies that should be employed to build on the successes of the past decades are listed in the housing opportunities section of this plan.



**Former Hamm’s Brewery Site Revitalization**

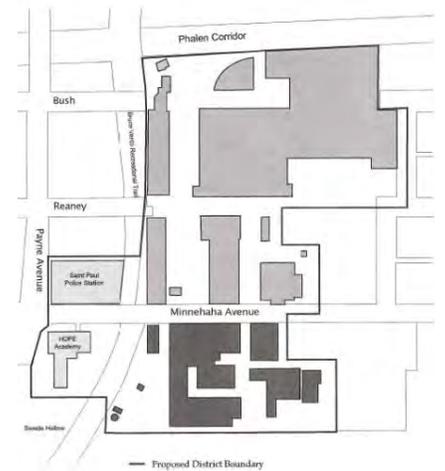
The former Hamm’s Brewery Site is a designated ‘Opportunity Site’ in the Saint Paul 2040 Comprehensive Plan. The Theodore Hamm Brewing Company was established in 1865 on Saint Paul’s East Side. The brewery grew through the late 19th and early 20th centuries, becoming an iconic Saint Paul employer and influencing the development of the surrounding Dayton’s Bluff neighborhood. In the latter half of the 20th century, the brewery was sold multiple times before finally operating as Stroh’s from 1983 until the brewery’s closure in 1997. The oldest remaining brewery buildings south of Minnehaha Avenue sat vacant after the closure of the brewery. In 2003, the Saint Paul Housing Authority purchased 8.79 acres of the former Hamm’s Brewery Complex. The property purchase was meant to preserve and expand Swede Hollow Park, and to acquire buildings on site for redevelopment.



**Early photo of Hamm’s Brewery top right and recent photo, middle right**

In 2004, the City of Saint Paul and collaborative partners developed the Hamm’s Brewery Reuse Study and Vision Plan. The plan includes site history and historic designation analysis, existing conditions, economic analysis, reuse scenario recommendations and implementation strategies. The former Hamm’s Brewery site is central to the historic district designation awarded in 2010 (Reference 2004 Proposed Historic Designation Area Map, right).

*Hamm Brewery Proposed Historic District Map*



**2023 Development Progress and Concept**

Four sites have been sold and redeveloped within the former Hamm’s Brewery Complex in the past decade. Most recently, in January 2023, the Housing & Redevelopment Authority authorized JB Vang, a MN corporation, to tentatively develop a 4.8 acre site for adaptive re-use. Once complete, the concept redevelopment will include affordable housing options, a thriving marketplace, and a wide variety of indoor and outdoor community gathering spaces (Concept plan below).

Hamm’s Development Fall Quarterly Report, dated October 19, 2023, included progress in grant applications completed for over one million dollars and drafted grant applications for another two million dollars. Among the many redevelopment initiatives happening at the Hamm’s site, the report highlighted progress in the Marketplace entrepreneur opportunity. Specifically, Marketplace design plans and breakout pricing have been received and meetings with Legacy Partners (Non-profit partner co-managing the project) are on-going, which include formalizing financing and ownership structure.





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## Neighborhood Voice Hamm's Redevelopment

In 2022, a joint statement was developed to address neighborhood sentiment regarding the redevelopment of the former Hamm's Brewery site.<sup>3</sup> The collaborative statement was signed by representatives of the following six organizations: Dayton's Bluff Community Council, Railroad Island Neighborhood Group, East Side Neighborhood Development Company, Historic Saint Paul, East Side Area Business Association, and Payne-Phalen Community Council. The 8-page joint statement was addressed to the City of Saint Paul Housing and Redevelopment Authority and contained the following community values, aims and objectives.

### *Summary of Community Values, Aims and Objectives*

1. Relevance to the East Side: Enhance the East Side community and share the benefits of growth within the community. The redevelopment should be a destination that attracts locals and visitors, acts as a springboard for further positive neighborhood revitalization, and bolsters existing projects underway.
2. Equity, Social Justice and Community Benefits: Call to make serious and long-lasting investments that will erase the existing poverty and sustain prosperity for future generations. Benefits of development should benefit the existing community, align with Saint Paul's 2040 comprehensive plan, and use an equity scorecard in review of proposals, and inclusive of all incomes with mixed uses and activities accessible and affordable to all.
  - a. On the matter of housing: Call to build affordable housing and abide by a residential linkage policy that ensures long-term affordability and sustaining wealth-building residential opportunities such as homeownership.
  - b. On the matter of employment, education, and wealth creation: Call to create and sustain wealth-building employment, work, and entrepreneurial opportunities for residents now and in the future, abide by an employment linkage policy, build in affordable commercial space in support of business development.
3. Site, Situation, and Prominence of the location within the surrounding area: Call for developer to:
  - a. Assist with daylighting Phalen Creek and incorporate the creek in the redevelopment
  - b. Restore and rehabilitate Swede Hollow Park
  - c. Include a public observatory at the top of the building with views of the City, Phalen Creek Valley and Mississippi River Valley.
4. Restoration and rehabilitation of existing historic buildings, character, and site features: Preserve the historic value of the site and maintain the visual continuity of the site. Consider reuse of the wells on the southwest corner and preserve the historic feature in the interpretation of importance and value of water.
5. Land use, building uses, and spaces: Encourage creative uses of the complex that is a source of neighborhood pride such as museum space and cultural space.
6. Sustainability, connectivity and environmental justice: Call to foster environmental resiliency and sustainability in energy production (renewable-solar, hydrothermal), building materials, impact on water sources (aquifers and creek), impact to local wildlife and flora, focus on active transportation and links to public transportation hubs to reduce single-occupancy vehicle dependence.
7. Improving public use and ensuring ongoing community access: Ensure that key spaces within the complex will be recreated for public use and will have easy, free, and ongoing public access with detailed recommendations on page 7.
8. Moving forward by building upon the community efforts already underway: Build upon existing plans such as 2004 Hamm's Brewery Reuse Study, 2009 Dayton's Bluff District Plan, 2012 Near East Side Roadmap, and 2019 Swede Hollow Master Plan. Existing projects such as Purple Line, EV Spot Network, daylighting Phalen Creek, Wakan Tipi Interpretive Center, preservation and enhancement of the Bruce Vento Nature Sanctuary.

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<sup>3</sup> Joint Statement RE: Request for Proposals for the Hamm's Brewery Complex, April 29, 2022.  
Railroad Island NRSA 12/22/2023



Transit

Transportation in historic Railroad Island is a challenge in all modes including vehicle, pedestrian and transit. The railroad tracks block direct traffic to-from the north, west, and south and the bluff in Swede Hollow blocks direct traffic to-from the east. Payne Avenue, Tadesco/Lafayette Road, and a small portion of 7<sup>th</sup> Street provide the only direct connections to-from the Railroad Island community, circled in the **Metro Transit Route 61 and 64 Maps** below.

Bus transit is available to-from Railroad Island with two routes #61 and #64. Route #64 (Payne - Maryland - White Bear Av - Maplewood Mall) shown in the maps below. Bus route #64 travels southwest and northeast through the Railroad Island neighborhood. The bus carries passengers, approximately 7 miles, in between two major destinations, including downtown Saint Paul and Maplewood Mall. Route #61 travels a similar direction through the Railroad Island community, along 7<sup>th</sup> Street and Arcade and provides transportation to downtown Minneapolis.

Bus Route 61 Map

Railroad Island Area Bus Routes

Bus Route 64 Map



Metro Transit is planning future Bus Rapid Transit (BRT) routes including the [purple line](#), along Phalen Boulevard between Union Depot in downtown Saint Paul and downtown White Bear Lake. The planned 10-mile bus rapid transit [gold line](#) will connect St. Paul, Maplewood, Landfall, Oakdale, and Woodbury and is scheduled for service in 2025.

**Other Transit/Ride Sharing Opportunities:** Uber, Lift, bike and scooter short term rentals, Evie Carshare, EV Spot Network (access to electric vehicles), and Hour Car.

The following quote describes the historic Railroad Island community that is surrounded mostly by railroads. This Neighborhood Revitalization Strategy Area (NRSA) document encompasses a larger 3-Census tract area for demographic analysis purposes and to include a key redevelopment site adjacent to the historic Railroad Island neighborhood. The quote provides contextual evidence of the transportation challenges that exist in the area.

*Railroad Island is one of those disorienting places. On a map, it looks like a pork chop: Payne Avenue curving around its east side and separating it from Swede Hollow Park, Phalen to the north, the railroad forming the western edge, and about a block of East 7 Street on the south. I try to walk the perimeter of the pork chop, and it doesn't quite work. Steep hills toss streets where they're unexpected or squish them together, and the railroad ravine limits foot traffic to the west. The railroads that give Railroad Island its name run parallel to Phalen and then curve south. About 30 baby trees have been planted on a bluff overlooking the western tracks. Because downtown St. Paul is invisible unless you're close to East 7th, and due to Swede Hollow's steep drop-off on the other side of the tracks, it's easy to feel enclosed and islanded. (On Railroad Island, MinnPost, 2013)*

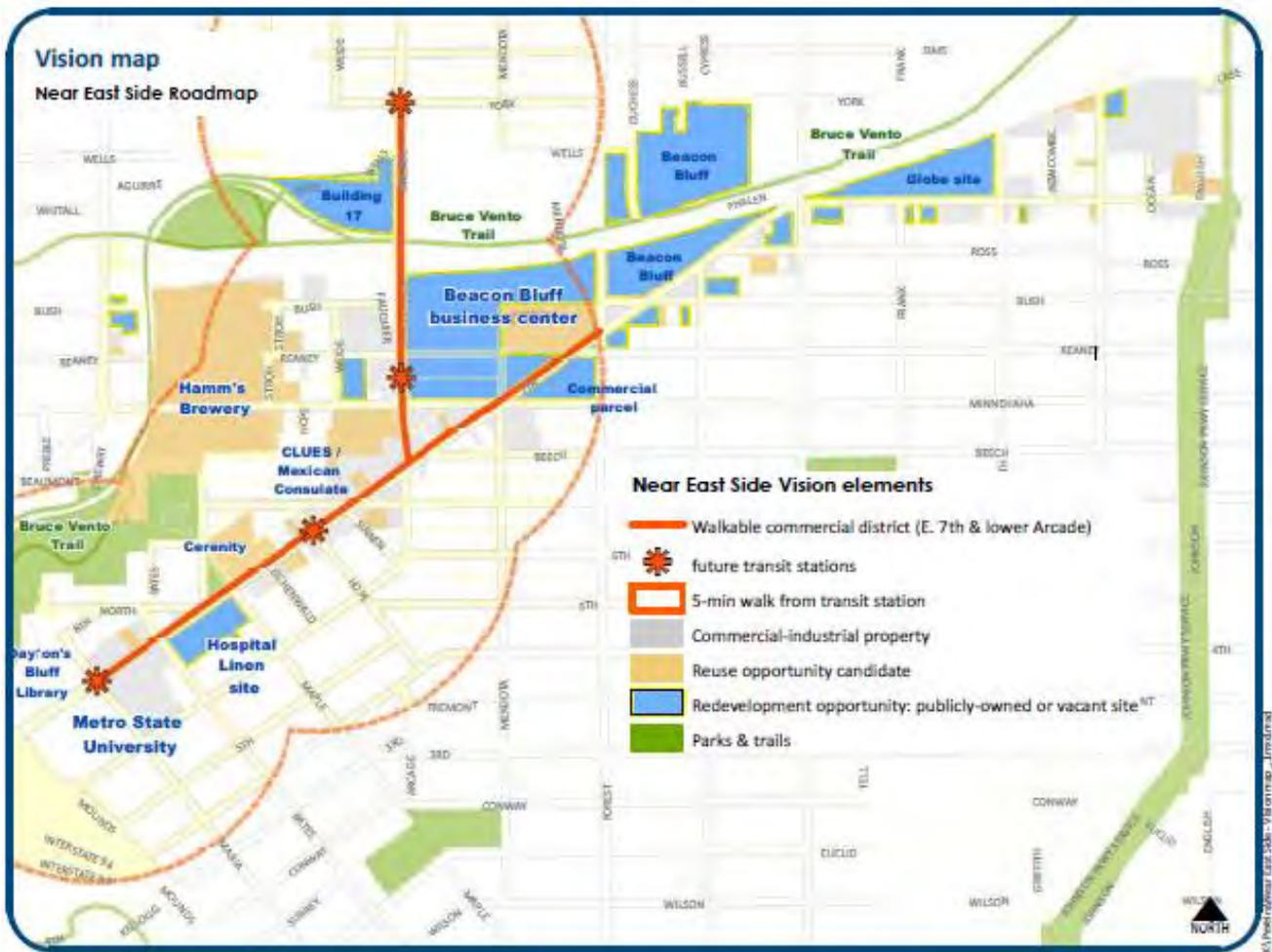


Transit & Streetscape Visions

The 2012 Near East Side Roadmap Plan outlined a vision for the Phalen Boulevard, 7<sup>th</sup> Street and Arcade Avenue commercial corridor including future transit stations shown on the **Vision Map** below. The plan states, “East 7th St and lower Arcade Street area is more than its individual businesses. It is a distinct area that has a unique identity of small, retail and convenience service businesses.” The plan goes on to recommend business collaboration and capacity development to improve marketing the district and improve the area economy.

Since the 2012 vision, the intersection of Payne and 7th was altered to improve sightlines and ease congestion. As of December 2023, the Arcade Street redesign is in the final stages of planning and is anticipated to be re-constructed by the end of 2025.

The following map identifies transit, streetscape, and property development opportunities and visions for the southeastern edge of Railroad Island neighborhood. One highly analyzed and planned redevelopment site is the former Hamm’s Brewery property north of Bruce Vento Trail and Metro State University. The Hamm’s Brewery property is further described below.



Several transportation recommendations for the Railroad Island community are stated in previous plans including detailed streetscape improvements for the surrounding streets. Goals within the 2012 roadmap include a safe, clean, attractive, and vibrant streetscape. Improvements to E. 7th Street include more pedestrian friendly design, and a greater consistency of design along the street with an intension to achieve a critical mass of active uses and foot traffic. The walkable commercial district would benefit from a defined beginning (Maria) and end (Forest), and should engage local customers and regional multi-modal traffic.



## Community Assets and Education

Opportunities abound in the community assets and education in Railroad Island and surrounding communities. Railroad Island is mostly residential however the surrounding East Side neighborhood and city of Saint Paul offer several nearby community facilities and resources.

### Libraries, Parks, Community Facilities

The Payne-Phalen neighborhood that surrounds Railroad Island is rich with cultural assets including libraries, parks, schools, religious institutions, and community facilities described below. Greater Saint Paul is also bursting with community assets and amenities accessible to Railroad Island community residents.



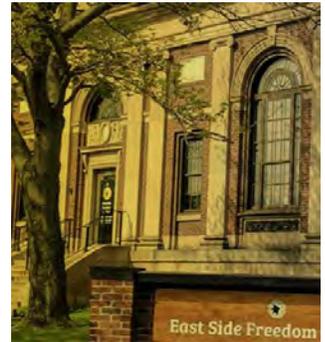
#### *Arlington Hills Community Center*

<https://sppl.org/locations/ar/> Features library, recreation center, park, after-hours book return, charging locker, computers, handicapped accessible, homework center, lucky day collection, parking lot, pop-up meeting kits, study room, Wi-Fi.

#### *Eastside Freedom Library*

<https://eastsidefreedomlibrary.org>

The East Side Freedom Library (ESFL) has its home in the former Arlington Hills library, one of St. Paul's historic Carnegie library buildings at 1105 Greenbrier Street, located in the Payne-Phalen neighborhood. The ESFL's mission is to inspire solidarity, advocate for justice and work toward equity for all.



#### *Dayton's Bluff Metropolitan University Library*

<https://sppl.org/locations/DB/>

Part of the Saint Paul public libraries system, the Metropolitan University Library offers access to library services and meeting rooms.

#### *Bruce Vento and Gateway Trails*

A 6 mile lightly trafficked loop trail located near downtown Saint Paul and Railroad Island that features a lake and is good for all skill levels. The trail is primarily used for hiking, walking, trail running, and bird watching and is best used from February until December.



#### *Weida Park*

Weida Park's primary feature is a rectangular, lit field perfect for games of soccer, Ultimate Frisbee, lacrosse, and more. The park also contains a basketball court, picnic tables, BBQ grills, and a playground area.

#### *Swede Hollow Park*

A unique green space with a rich history located in the Dayton's Bluff and Railroad Island neighborhoods. Swede Hollow Park is enjoyed by many residents and visitors looking for a green escape in an urban setting. The park is named after the historic residential neighborhood that formed in the late 1800s as part of today's Railroad Island and Dayton's Bluff community.

#### *Arlington-Arkwright Park*

Spread across over 20 acres of land, Arlington Arkwright Park is home to a dog park, skate park, baseball field, soccer field, outdoor basketball court, two tennis courts and a picnic area.





### *Wilder Recreation Center*

Wilder offers educational programs, after school activities, open gym, tot-times, family events, youth and adult athletics, field rentals, rental space for parties, meetings, and events, and so much more.

### *Lockwood Park*

Lockwood Park underwent a renovation in 2016. Improvements included new swings, picnic tables, play areas for ages 2-5 and 5-12, bike rack, shade trees, benches, and a resilient play surface.

## Schools and Foundations

Nearby Schools: Phalen Lake Elementary, Cleveland Quality Middle School, City Academy High School, Hope Academy.

Foundations: The Bush Foundation , Wilder Foundation , Saint Paul Festival & Heritage Foundation.

## Art and Events

One of the liveliest of St. Paul’s main street commercial districts is East Side’s Payne Avenue. Payne Avenue hosts multi-cultural restaurants and businesses and features lively events and community art. Murals line the avenue from 7<sup>th</sup> Street to Marigold. The [East Side Art Council](#) supports many art galleries and studios along Payne Avenue including East Side Art Gallery. Several events, art exhibitions, community gatherings, performances, and fairs take place on Payne Avenue. The [St. Paul Art Collective](#) runs and supports projects, initiatives, and events that increase the awareness of artists, their work, and their cultural contributions including the Saint Paul Art Crawl. A 2020 article unveiled the east side economic development strategy in its title, “The heart of St. Paul’s East Side, Payne Avenue is being reborn as an arts district.”



## Colleges and Universities

Saint Paul is home to the following sixteen colleges and universities. The closest, Metropolitan State University is located within walking distance of Railroad Island at 700 East Seventh Street.

- I. Century College
- II. Inver Hills Community College
- III. Mpls Community & Technical College
- IV. Saint Paul College
- V. Metropolitan State University (Pictured Right)**
- VI. University of Minnesota
- VII. Bethel University
- VIII. Concordia University
- IX. Hamline University
- X. Macalester College
- XI. St. Catherine University
- XII. The College of St. Scholastica
- XIII. University of Northwestern
- XIV. University of St. Thomas
- XV. William Mitchell College of Law
- XVI. McNally Smith College of Music







## Appendix A: Acknowledgments & Neighborhood Comments

Thank you to all attendees of the public meetings and consultations that contributed their time and knowledge to this neighborhood strategy area plan. The following neighborhood comments were recorded from the public meetings listed below and in the consultation section of this plan.

### Railroad Island Neighborhood Group review meeting November 2, 2023

Comments:

1. Consultation: Add project webpage, update the public hearing date of November 30, 2023 hybrid meeting during the comment period
2. RRI history: Discussion and offer to verify with local historian
3. Historic District and Sites map: Add purple and green to the legend
4. Housing and Population: Add 2010 data of 3 census tracts, add poverty level
5. Economy and Employment: Add Karibo at Minnehaha / Payne. Discussion of adding list of businesses
6. Hamm's Brewery Site Revitalization: Discussion regarding developer
7. Summary Opportunities Table: #1 – increase in homeownership rates – remove reference to DBHS lease to own program
8. Other Opportunities Table: Request for review and status.

### Dayton's Bluff Community Council District 4: Public meeting November 20, 2023

Comments:

1. Boundaries: Correct narrative from 5<sup>th</sup> Street to 6<sup>th</sup> Street
2. Add-in information regarding Saint Paul water quality and lead testing program
3. Discussed how this NRSA affects the Hamm's Redevelopment. This NRSA allows augmentation of the redevelopment initiatives and added flexibility in HUD investments. Specifically, CDBG targets affordable housing and job creation activities.
4. Economy & Employment: Discussed addition of list of businesses/employers
5. Transit: Add purple line and gold line construction
6. Appendix B: Railroad Island Other Opportunities Table: Discussed adding purpose of the table as a historic inventory of previous plans, or potentially removing the 2023-2024 Action Plan items, or adding historic or active to the status column.

### Payne-Phalen Community Council District 5: Public meeting November 28, 2023

Comments:

1. Throughout: Correct council and neighborhood name to Payne-Phalen Community Council
2. Page 10 Housing Age: Add map key
3. Staff written comments:
  - a. Incorporate the *Hamm's Joint Statement on Community Values*
  - b. Review and incorporate the following plans: City of St. Paul, *St. Paul for All* 2040 Plan, City of St. Paul Climate and Resilience Plan, City of St. Paul, The Anti-Displacement Plan and Community Wealth Building Study, City of St. Paul, Swede Hollow Master Plan, The City of St. Paul EV Spot Network
  - c. Incorporate community engagement, planning and updates that have taken place with reference to: MnDOT's Arcade Street and West 7th Street project, The Purple Line Bus Rapid Transit (BRT), Eastside expansion of EV Spot Network and Evie Carshare, Daylighting Phalen Creek, East Side Housing Justice
  - d. Work with the Hamm's Developer on further consultation scheduled in January-February
  - e. Follow-up on the NRSA process.

### Virtual public hearing November 30, 2023 during 30-day comment period (November 20- December 21, 2023)



## Appendix B: Railroad Island Other Opportunities Table

The following other opportunities table is organized by topic areas in the fourth column including: Housing (H), Economic Development Individual Income (EDII), Transportation (T), Parks, Trails, Open Space (PTOS), Community Facilities and Programs (CFP) and by source in the third column. The following opportunities, goals, and strategies are identified through previous Railroad Island neighborhood plans, City of Saint Paul plans, and current consultations with stakeholders. The following is a partial list of community-derived opportunities for neighborhood improvements taken from some of the 18 sources enumerated on page 12.

Railroad Island Other Opportunities Table				
Topics: Housing (H), Economic Development Individual Income (EDII), Transportation (T), Parks, Trails, Open Space (PTOS), Community Facilities & Programs (CFP)				
#	Goal, Strategy, Opportunity	Source	Topic	Status
1	H1 Encourage better maintenance of the existing housing stock through enforcement and incentive programs.	2007 Railroad Island Plan	H	
2	H2 Address the issues of vacant housing and absentee landlords through laws and enforcement.	2007 Railroad Island Plan	H	
3	H3 Encourage new housing in the community with city grants and revolving funds.	2007 Railroad Island Plan	H	
4	H4 Preserve the affordability of housing in the area by creating new ownership opportunities for a range of income levels.	2007 Railroad Island Plan	H	
5	H5 Encourage new single-family housing to be built on lots that are at least 40 feet in width and 5,000 square feet in lot area; discourage lot splits that create lots that do not meet the minimum standard for the zoning district.	2007 Railroad Island Plan	H	
6	H6 Rivoli Bluff would benefit from an influx of new owner occupied housing. New development and rehabilitation should consider the design guidelines contained in the full Railroad Island Plan – Appendix G. Below the bluff, redevelopment of housing or other uses should occur as soil condition permits.	2007 Railroad Island Plan	H	
7	H7 Provide financial assistance to residents to maintain and improve their homes (especially improvements in energy-efficiency) and to improve the aesthetics of the homes while maintaining their historic character.	2007 Railroad Island Plan	H	
8	H8 Strengthen city code enforcement to discourage nuisance properties.	2007 Railroad Island Plan	H	
9	H9 Explore the demolition and industrial redevelopment of housing located on Bush near Payne Ave.	2007 Railroad Island Plan	H	
10	H10 Study the potential need to change the duplex zoning to single-family in order to deter the conversion of single-family houses to duplex and curb the increase in rental units.	2007 Railroad Island Plan	H	
11	H11 Explore a program to move historic structures currently located on substandard lots (less than 40 feet wide or 5,000 square feet in area) to vacant buildable parcels in or near the neighborhood. Economic feasibility should be a part of the evaluation for suitable structures for relocation.	2007 Railroad Island Plan	H	
12	H12 Promote the renovation of historic buildings so that they meet new code standards, while encouraging new construction.	2007 Railroad Island Plan	H	
13	H13 Improvements in the appearance of housing and its character, including retaining singlefamily residential units and preserving their historic architecture. Rental housing should be designed for that purpose and existing single family buildings should not be subdivided to increase the density of housing.	2009 Dayton's Bluff District 4 Plan	H	
14	H14 District 4 requests that higher density residential developments be designed consistent with the City's residential design standards and with parking strategies that encourage residents to use transit, including, but not limited to, reduction in the numbers of on-site parking spaces and creation of a parking management plan that prevents spillover parking in the neighborhoods and assists residents in using transit where adequate service is	2009 Dayton's Bluff District 4 Plan	H	



<b>Railroad Island Other Opportunities Table</b> <b>Topics: Housing (H), Economic Development Individual Income (EDII), Transportation (T), Parks, Trails, Open Space (PTOS), Community Facilities &amp; Programs (CFP)</b>				
	available. Public Works will work with the district council and the developer on issues related to on-street parking for the project and street design.			
15	H15 Provide input from City code enforcement officials that District 4 can use to establish programs, such as the Good Neighbor Program, to address residential neighborhood problems.	2009 Dayton's Bluff District 4 Plan	H	
16	H16 Identify problem properties and, in collaboration with District 4 and applicable neighborhood block clubs, develop strategies for addressing issues associated with them.	2009 Dayton's Bluff District 4 Plan	H	
17	H17 Provide District 4 with information about Invest Saint Paul, the City's neighborhood improvement and maintenance strategy. This includes information about rehabilitation of vacant buildings and construction of new buildings on vacant sites, as well as the criteria used to determine whether vacant buildings should be rehabilitated or demolished. Seek input from District 4, as appropriate.	2009 Dayton's Bluff District 4 Plan	H	
18	H18 Continue to provide District 4 with information about pending actions against vacant properties under the City's nuisance ordinance so that the district council may comment regarding proposed actions for the property.	2009 Dayton's Bluff District 4 Plan	H	
19	H19 The District Council will work with developers to identify possible sites within the neighborhood to which a structure could be moved if the structure cannot be reused or cannot be incorporated into a proposed development. If demolition or rehabilitation of a structure is unavoidable, the District Council encourages "deconstruction" techniques to be used to salvage whatever materials possible for reuse.	2009 Dayton's Bluff District 4 Plan	H	
20	H20 Prepare a study of residential districts within District 4 to determine if, and where, duplex districts should be rezoned to single family districts. Based on the conclusions of the study, work to rezone areas that are currently zoned for duplexes so that these housing units may be returned to their original use.	2009 Dayton's Bluff District 4 Plan	H	
21	H21 Homeless prevention assisting approximately 125 households with tenant-based rental assistance (TBRA)/rapid re-housing (RRH); 3,000 persons in overnight shelters; and 400 persons with supportive services to help keep households housed.	Saint Paul Action Plan 2023-2024	H	
22	H22 Development of new affordable housing with an estimated 15 rental units and 5 homeowner units;	Saint Paul Action Plan 2023-2024	H	
23	H23 Preservation of existing affordable housing - rental housing rehabilitation an estimated 26 rental units;	Saint Paul Action Plan 2023-2024	H	
24	H24 Preservation of existing affordable housing – homeowner housing rehabilitation an estimated 51 owner units;	Saint Paul Action Plan 2023-2024	H	
25	H25 Acquisition, demolition, and clearance of property an estimated 17 structures;	Saint Paul Action Plan 2023-2024	H	
26	EDII 1 Increase in employment rates	2016 Example HUD Notice	EDII	Ongoing
27	EDII 2 Increase in median household income	2016 Example HUD Notice	EDII	Ongoing
28	EDII 3 LMI persons direct benefit activities – Support public services including fair housing activities, community engagement, domestic violence prevention, criminal restorative justice, health care, employment training, conflict resolution, and emergency shelter	2016 Example HUD Notice, SP Consolidated Plan	EDII	Ongoing
29	EDII 4 New Market Tax Credits	DBHS Consult	EDII	
30	EDII 5 Youth employment incubators	DBHS Consult	EDII	
31	EDII 6 Support the establishment of commercial uses that serve the neighborhood and/or would attract people to the neighborhood.	2007 Railroad Island Plan	EDII	



<b>Railroad Island Other Opportunities Table</b> <b>Topics: Housing (H), Economic Development Individual Income (EDII), Transportation (T), Parks, Trails, Open Space (PTOS), Community Facilities &amp; Programs (CFP)</b>				
32	EDII 7 Support local businesses; encourage them to stay in Railroad Island and maintain and improve their properties/businesses and to become involved in community activities.	2007 Railroad Island Plan	EDII	
33	EDII 8 Work with residences and industrial/commercial establishments to soften the edge between residential properties and industrial and commercial uses through landscaping, decorative fencing as a visual barrier, and other techniques to provide a buffer.	2007 Railroad Island Plan	EDII	
34	EDII 9 Attract new businesses to create employment opportunities in the area; work with existing businesses to retain jobs.	2007 Railroad Island Plan	EDII	
35	EDII 10 Provide support for recreational services, job training, and employment opportunities for area youth.	2007 Railroad Island Plan	EDII	
36	EDII 11 A revitalized business district, focused on East 7th Street, Lafayette Park, and the Hudson/Earl intersection, represented by an active business organization, that provides a full range of good and services.	2009 Dayton's Bluff District 4 Plan	EDII	
37	EDII 12 Prepare a zoning study of existing commercial districts within District 4 to determine if the Traditional Neighborhood District is appropriate, particularly to promote mixed use development in these areas.	2009 Dayton's Bluff District 4 Plan	EDII	
38	EDII 13 Implement the policies and recommendations for the Lafayette Park business area as described in the Northeast Corridor Development Plan	2009 Dayton's Bluff District 4 Plan	EDII	
39	EDII 14 Promote the reuse, instead of demolition, of existing commercial buildings.	2009 Dayton's Bluff District 4 Plan	EDII	
40	EDII 15 Promote the shared use of existing surface parking lots; oppose expansion of existing surface parking lots. District 4 supports the use of permeable or semi-permeable paving in parking lot construction and the use of rain gardens to reduce runoff.	2009 Dayton's Bluff District 4 Plan	EDII	
41	EDII 16 The Department of Safety and Inspections shall enforce regulations regarding the operations of retail stores; specifically, the issues of waste disposal, advertising, and parking.	2009 Dayton's Bluff District 4 Plan	EDII	
42	EDII 17 Collaborate with District 4 to expand and implement existing façade improvement programs.	2009 Dayton's Bluff District 4 Plan	EDII	
43	EDII 18 Utilize the East 7th Street Design Guidelines during the site plan review process for proposed projects involving new and remodeled businesses.	2009 Dayton's Bluff District 4 Plan	EDII	
44	EDII 19 Work with District 4 to strengthen the business district through the following: C8.1. Determine the feasibility of creating a small business incubator; search for potential sites.	2009 Dayton's Bluff District 4 Plan	EDII	
45	EDII 20 Ensure that new commercial development includes a mixture of uses and is integrated into the existing fabric of the commercial district in which it is located; new development would adhere to the building design standards in Section 63.110 of the Zoning Code. Include community input as part of the development process.	2009 Dayton's Bluff District 4 Plan	EDII	
46	EDII 21 Assist District 4 in partnering with an existing Community Development Corporation on programs that support business development.	2009 Dayton's Bluff District 4 Plan	EDII	
47	EDII 22 Work with District 4 to attract businesses that provide a full range of goods and services, including a bank.	2009 Dayton's Bluff District 4 Plan	EDII	
48	EDII 23 Youth Employment will benefit approximately 258 persons.	Saint Paul Action Plan 2023-2024	EDII	
49	EDII 24 Economic development and job growth will benefit 3 businesses with façade improvements, creation of approximately 5 jobs, and an estimated 2 businesses will be assisted.	Saint Paul Action Plan 2023-2024	EDII	
50	EDII 25 Achieve a mix of existing businesses and new light industrial uses in the development of industrial sites	2006 Phalen Corridor Development Strategy	EDII	
51	EDII 26 Retain and enhance the buffering of homes on the west side of Johnson Parkway	2006 Phalen Corridor Development Strategy	EDII	
52	EDII 27 Strengthen the mixed use area on the south side of East Seventh Street	2006 Phalen Corridor Development Strategy	EDII	



Railroad Island Other Opportunities Table				
Topics: Housing (H), Economic Development Individual Income (EDII), Transportation (T), Parks, Trails, Open Space (PTOS), Community Facilities & Programs (CFP)				
53	EDII 28 City and the Port Authority seek federal and state funds to clean up polluted industrial sites, known as “brownfields,” so that new businesses can be developed on the sites. The requirement for award of these funds is tax base revitalization and job creation. Cleanup of polluted lands is followed by development of businesses that meet the standards set by the Port Authority for numbers of jobs related to the size of the development and for wages.	2006 Phalen Corridor Development Strategy	EDII	
54	EDII 29 Cleanup of contaminated properties: Collaborate with the St. Paul Port Authority in its efforts to secure grant funding for the cleanup of contaminated sites, including but not limited to, grants awarded by the Minnesota Department of Employment and Economic Development and the Metropolitan Council.	2006 Phalen Corridor Development Strategy	EDII	
55	EDII 30 Land uses and zoning: Provide for the redevelopment of properties with commercial and industrial uses that provide significant employment, particularly newly-created employment opportunities. Change the zoning of property in the area in accordance with Map B – Proposed Zoning (Map A depicts current zoning). Zoning for commercial and industrial uses is intended to attract high-quality businesses and to focus redevelopment in a manner compatible with surrounding properties. Work with public and private entities to implement the land use plan shown on Map C – Proposed Land Use.	2006 Phalen Corridor Development Strategy	EDII	
56	EDII 31 Building and site design: Enforce building and site design guidelines, as outlined below, to guide development in the Phalen/Atlantic area and ensure high-quality design. Intensive land uses, more extensive site coverage, and taller buildings are tolerable if the sites are developed with attention to site and building design.	2006 Phalen Corridor Development Strategy	EDII	
57	T1 Improvements on Payne Avenue from Minnehaha Avenue to East 7th Street, recommendations for Payne Avenue improve walkability, connections to Swede Hollow Park and overall quality of life <b>(See Appendix D: Payne Avenue Improvements Maps and list of 15 strategic enhancements)</b>	Payne Avenue Street Improvements (2014)	T	
58	T2 Detailed improvements from Beaumont Street to East 7th Street.	Payne Avenue Street Improvements (2014)	T	
59	T3 Improving pedestrian and vehicular access through new alignment strategies for Payne Avenue and adjoining cross streets.	Payne Avenue Street Improvements (2014)	T	
60	T4 Improving parking for businesses and addressing future development.	Payne Avenue Street Improvements (2014)	T	
61	T5 Three focus areas: • The commercial area between Beaumont Street and Tedesco Street • The Housing and Redevelopment Authority (HRA) parcel between Kenny Street and Woodward Street • The Railroad Island Entertainment District on south Payne Avenue	Payne Avenue Street Improvements (2014)	T	
62	T6 Technical drawings for submittal to the City of Saint Paul – CIB fund?	Payne Avenue Street Improvements (2014)	T	
63	T7 2012 Roadmap detailed streetscape improvements Vision Map above in Streetscape visions section. Goals: A safe, clean, attractive, and vibrant streetscape.	2012 Near Eastside Roadmap	T	
64	T8 Improvements to E. 7th Street include more pedestrian friendly design, a greater consistency of design along the street with an intention to achieve a critical mass of active uses and foot traffic. The walkable commercial district would benefit from a defined beginning (Maria) and end (Forest), and should engage local customers and regional multi-modal traffic.	2012 Near Eastside Roadmap	T	
65	T9 Encourage railroad companies to create landscaped buffer areas and remove debris from railroad properties.	2007 Railroad Island Plan	T	



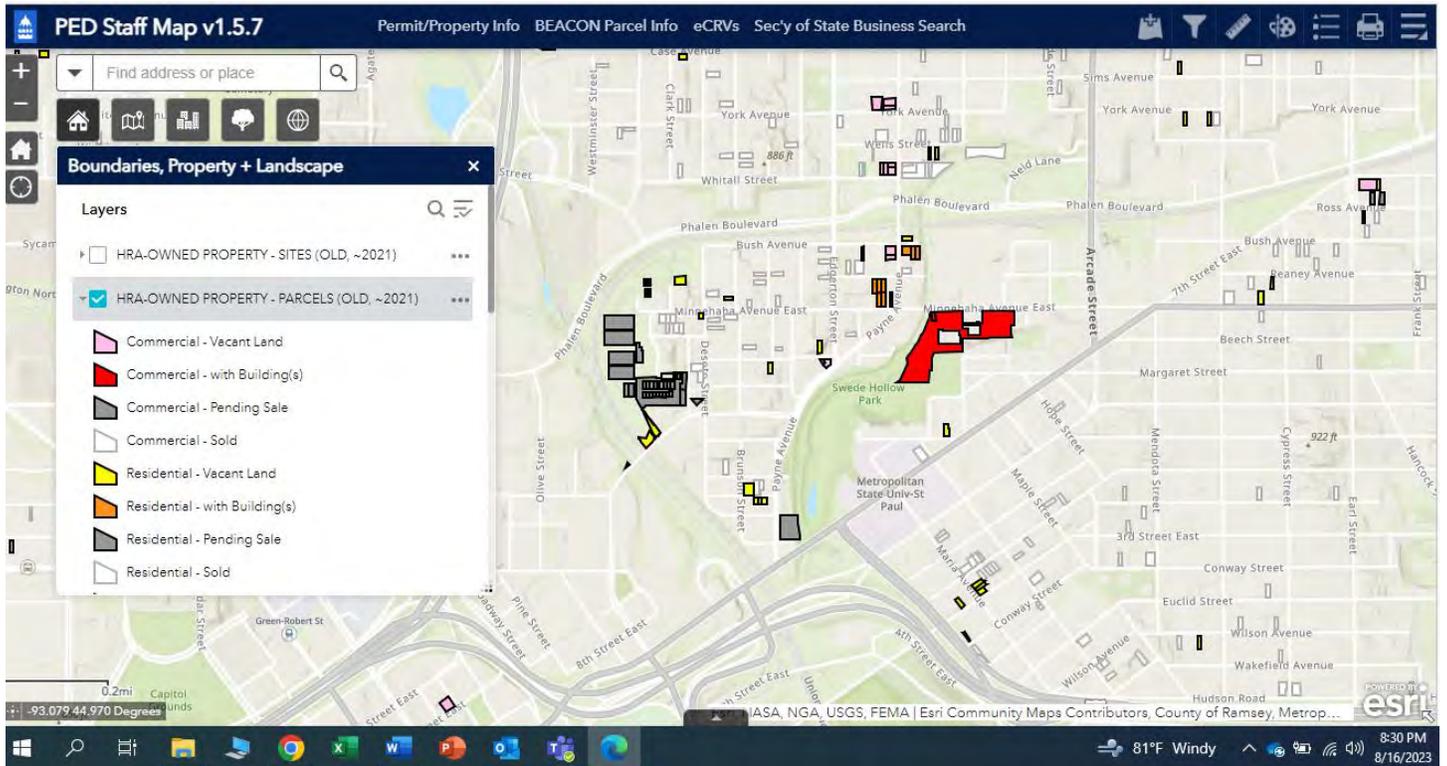
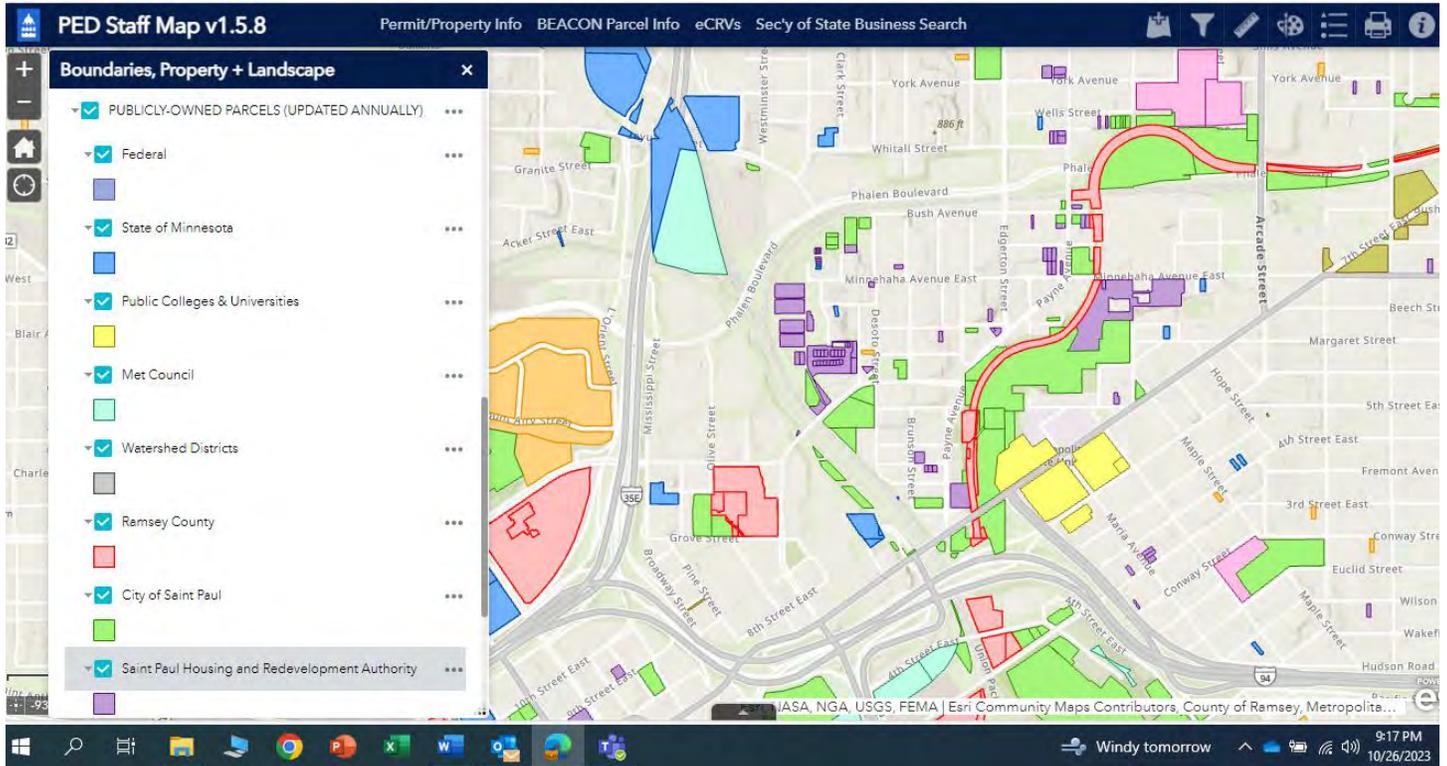
<b>Railroad Island Other Opportunities Table</b> <b>Topics: Housing (H), Economic Development Individual Income (EDII), Transportation (T), Parks, Trails, Open Space (PTOS), Community Facilities &amp; Programs (CFP)</b>				
66	T10 Reconstruct Payne Avenue from East Seventh Street to Phalen Boulevard, incorporating recommendations of a neighborhood task force on streetscaping improvements such as a historic lighting system, traffic calming features, greenery, and pedestrian and bicycle safety features such as revised traffic signals, new sidewalks, bump-outs and a planted center median. Payne Avenue Bridge over the railroad tracks (Bridge #62544) should also be improved to incorporate historic style lighting, decorative rails, and visually interesting piers and beams. The community will work with Public Works to develop a reconstruction plan, develop a maintenance plan, and adopt the above-standard improvements or establish an above standard maintenance district.	2007 Railroad Island Plan	T	
67	T11 Reconstruct the East 7th Street bridge that connects Railroad Island to Downtown St. Paul to be more attractive and pedestrian-friendly and to correspond with the bridge across the Bruce Vento trail immediately to the north.	2007 Railroad Island Plan	T	
68	T12 A comprehensive multi-modal transportation system that incorporates transit, well-paved streets and opportunities for pedestrians.	2009 Dayton's Bluff District 4 Plan	T	
69	T13 Enhance, stabilize and sustain the economic, social and physical prosperity of Saint Paul's East Side. Its focus is industrial development and jobs. Construction of a new road, Phalen Boulevard, in the rail corridor that stretches from I-35E, near downtown, to the Lake Phalen area will open up approximately 100 acres of under-utilized land for industrial development. Area includes land within approximately 1/4 mile either side of Phalen Boulevard, which runs along a rail corridor between I-35E and Phalen Village	2006 Phalen Corridor Development Strategy	T	Phalen Blvd constructed
70	PTOS1 Pursuing neighborhood bike path	DBHS Consult	PTOS	
71	PTOS2 Create visual connections in the neighborhood by establishing a network of linked open spaces and gardens and establish a plan to maintain them.	2007 Railroad Island Plan	PTOS	
72	PTOS3 Encourage guided walking tours in Swede Hollow Park to introduce the reclaimed park to residents. Emphasize not only the historic significance of the park, but also its current status as a uniquely rich and beautiful urban park.	2007 Railroad Island Plan	PTOS	
73	PTOS4 Create a "lookout" over Swede Hollow Park with an historic marker, which will be located across from the intersection of Tedesco Street and Payne Avenue. An organization in the community will adopt and maintain the marker.	2007 Railroad Island Plan	PTOS	
74	PTOS5 Protect all parks and publicly owned green spaces from non-park related development and/or neglect.	2007 Railroad Island Plan	PTOS	
75	PTOS6 Create better signage to mark trail entrances and distance.	2007 Railroad Island Plan	PTOS	
76	PTOS7 Transform vacant land into "pocket parks" which can be used for a variety of recreational activities or community gardens or opportunities for new owner occupied housing or needed commercial parking. The pocket parks should be designed with CPTED (Crime Prevention Through Environmental Design) standards and maintained by the community.	2007 Railroad Island Plan	PTOS	
77	PTOS8 Public places, such as parks, that are available for planned or spontaneous activities that engage residents. Spaces in the community which are attractive and welcoming.	2009 Dayton's Bluff District 4 Plan	PTOS	
78	PTOS9 Be compatible with the park-like character of the area, which includes Lake Phalen, Johnson Parkway and Ames Lake, with an arrangement of storm ponding	2006 Phalen Corridor Development Strategy	PTOS	
79	CFP1 Increase in educational attainment	2016 Example HUD Notice	CFP	Ongoing
80	CFP2 Provide improved or new access to public facilities	2016 Example HUD Notice	CFP	Ongoing
81	CFP3 Solar garden	DBHS Consult	CFP	
82	CFP4 Star Funding	DBHS Consult	CFP	



Railroad Island Other Opportunities Table Topics: Housing (H), Economic Development Individual Income (EDII), Transportation (T), Parks, Trails, Open Space (PTOS), Community Facilities & Programs (CFP)				
83	CFP5 Promote anti-littering campaigns involving residents, homeowners, and business owners and employees.	2007 Railroad Island Plan	CFP	
84	CFP6 Work with the community to explore potential uses for the vacant properties on Payne Avenue from Kenny to East Seventh Street, including the possibility of purchasing State Supply to allow for creation of a more attractive gateway to the area.	2007 Railroad Island Plan	CFP	
85	CFP7 Railroad Island community supports development of a cultural center in the Hamm’s Brewery space, as well as other potential facilities such as a museum dedicated to the Swede Hollow area, a café and exhibit space for local artists, an area that could serve the need for community meeting spaces, a performance space, etc.	2007 Railroad Island Plan	CFP	
86	CFP8 Provide wireless connections for internet users.	2007 Railroad Island Plan	CFP	
87	CFP9 Work with the City on strategies to keep area streets clean and attractive.	2007 Railroad Island Plan	CFP	
88	CFP10 Promote social integration across cultures and ages through community events that showcases the various cultures represented on Railroad Island.	2007 Railroad Island Plan	CFP	
89	CFP11 Bring together residents, businesses, community activists and law enforcement to create and implement strategies for making Swede Hollow Park welcoming to families and individuals of all ages. The goal would be to eradicate public drunkenness, drugs, littering, as well as shanties and tents used by the homeless in and around Swede Hollow Park.	2007 Railroad Island Plan	CFP	
90	CFP12 Involve neighbors of all age groups in the community through volunteerism. Facilitate intergenerational volunteer opportunities to enhance the community.	2007 Railroad Island Plan	CFP	
91	CFP13 Establish partnerships with local businesses, schools, institutions, churches, and civic groups to promote community involvement.	2007 Railroad Island Plan	CFP	
92	CFP14 Provide adequate police staffing to provide safety in the neighborhood as well as enforcement of laws for nuisance crimes such as those mentioned above.	2007 Railroad Island Plan	CFP	
93	CFP15 Provide support for establishment and maintenance of Block Clubs and Neighborhood Watch programs.	2007 Railroad Island Plan	CFP	
94	CFP16 Establish an attractive and unique “gateway” to Railroad Island that reflects its multicultural history. The theme of the gateway design should be carried through Payne Avenue when the street is reconstructed. The community will work with the City during the design process; an active community-based organization will maintain the above standard improvements by establishing an above-standard maintenance district.	2007 Railroad Island Plan	CFP	
95	CFP17 Promotion of the livability of the neighborhood by enhancing its appearance through cleanliness, crime prevention and rectifying code violations.	2009 Dayton’s Bluff District 4 Plan	CFP	
96	CFP18 Public service needs will benefit approximately 3,000 persons;	Saint Paul Action Plan 2023-2024	CFP	
97	CFP19 Community engagement and outreach to underserved populations will benefit an estimated 181,300 persons;	Saint Paul Action Plan 2023-2024	CFP	
98	CFP20 Public facilities and infrastructure improvements benefiting approximately 23,015 persons;	Saint Paul Action Plan 2023-2024	CFP	

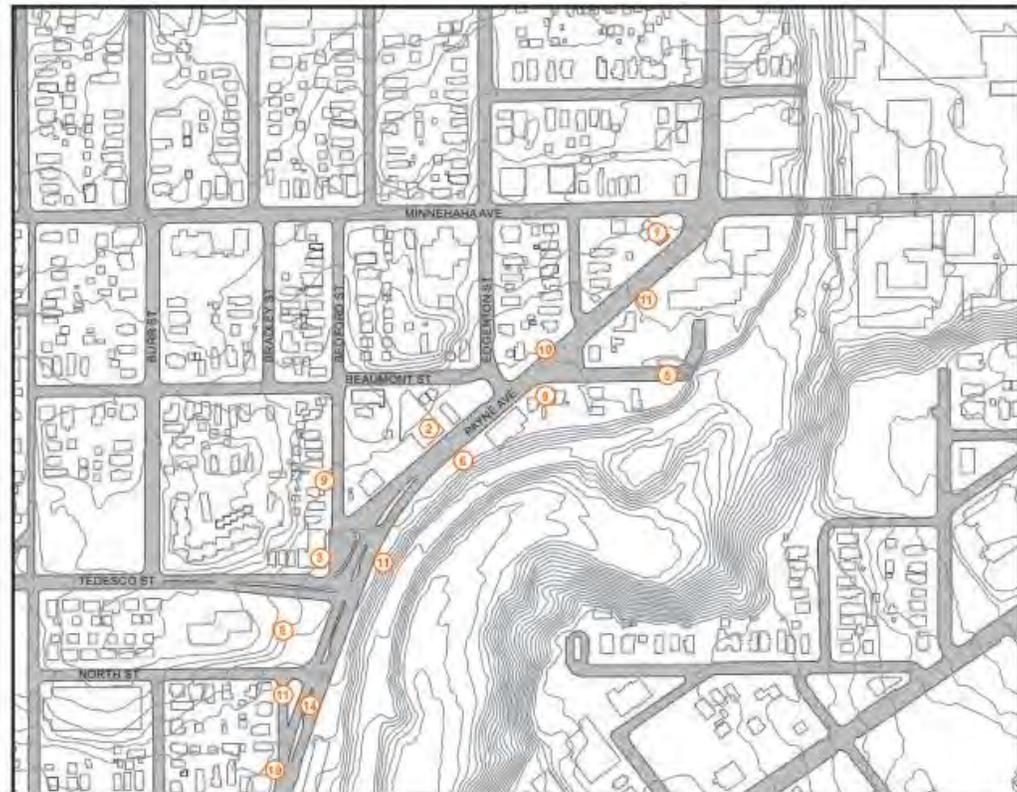


# Appendix C: Public-HRA Property



# Appendix D: 2014 Payne Avenue Improvements Maps

## Payne Avenue & Railroad Island: Key Community Strategies



Based on the workshop, the community developed a set of key strategic enhancements they would like to implement on Payne Avenue. This map shows the placement of those enhancements along Payne Avenue.

- 1. Develop gas station site
- 2. Increase parking for La Palma
- 3. Increase parking for Morelli's
- 4. Increase parking for Minnesota Music Cafe
- 5. Improve access/visibility of Swede Hollow entrance - City of Saint Paul Parks Interpretive Signage Standard
- 6. Enhance green space across from La Palma
- 7. Improve visual & physical access to Swede Hollow
- 8. Better utilization of Labor Plaza open space
- 9. Improve appearance of properties
- 10. Add more trash & recycling bins
- 11. Add lighting improvements: more pedestrian lighting in a consistent style
- 12. Create gateway at East 7th Street
- 13. Develop HIRA parcel
- 14. Remove medians - they are hard on delivery trucks and snow plows
- 15. Develop neighborhood identity/branding

Saint Paul Design Center	<b>Payne Avenue Street Improvements</b>	
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**Attachment H - HOME-ARP Allocation Plan Subs Amendment**

**DEPARTMENT OF PLANNING & ECONOMIC  
DEVELOPMENT MELANIE MCMAHON, INTERIM DIRECTOR**



**SAINT PAUL**  
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City of Saint Paul  
HOME-ARP Allocation Plan

Substantial Amendment #IV

Draft March 2, 2026

# Attachment H - HOME-ARP Allocation Plan Subs Amendment

## Contents

Introduction .....	3
Consultation .....	4
Consultations.....	5
Results of Consultations.....	6
Public Participation .....	8
Public Participation Process .....	8
Efforts to Broaden Public Participation.....	8
Comments and Recommendations Received .....	8
Comments or Recommendations Not Accepted.....	8
Needs Assessment and Gaps Analysis.....	9
1. Homeless Population.....	9
2. At-Risk of Homelessness .....	13
3. Survivors of Domestic Violence, Sexual Assault, Trafficking.....	16
4. Other Populations .....	16
Determination of Level of Need Gaps in the Inventory and Service Delivery System.....	18
Priority Needs for Qualifying Populations .....	18
HOME-ARP Activities .....	19
Selection of Developers, Service Providers, Subrecipients and/or Contractors: .....	19
Administration of Eligible Activities.....	19
Distribution of HOME-ARP Funds with Priority Needs Identified – Rationale for Proposed Plan .....	19
HOME-ARP Production Housing Goals.....	<del>21</del> <sup>20</sup>
Preferences & Referral Methods .....	<del>22</del> <sup>21</sup>
HOME-ARP Refinancing Guidelines .....	<del>23</del> <sup>22</sup>

### 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.

## Attachment H - HOME-ARP Allocation Plan Subs Amendment

### Consultations

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
<b>Heading Home Ramsey</b>	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.
<b>Saint Paul Homeless Action Response Team</b>	Public Agency/ Homeless Service Provider Coalition	Group meeting 11/2022	Consider sustainable long term resources. Non congregate shelter option if ongoing operating support leveraged
<b>Ramsey County – Community and Economic Development</b>	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
<b>Ramsey County – Veterans Services</b>	Public Agency/Veterans	Group discussion 9/2021	Affordable housing needed across all AMI levels for veterans. Some with mental health supports.
<b>Minnesota Housing Finance Agency</b>	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.
<b>Women’s Advocates</b>	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.
<b>Saint Paul Public Housing Agency</b>	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.
<b>Metro HRA</b>	PHA	Group discussion 9/2021	Invest in housing units that accept vouchers. Provide supportive services that help reduce housing instability and prevent eviction.
<b>Fair Housing Implementation Council</b>	Civil Rights/Fair Housing	Staff interviews 9/2021	Provided feedback on fair housing within the HOME-ARP program and how preferences could be set.

## Attachment H - HOME-ARP Allocation Plan Subs Amendment

<b>The Arc of MN</b>	Service Provider for Persons with Disabilities	Group meeting 9/2021 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.
<b>Catholic Charities</b>	Homeless Service Provider	Interview 9/2021 Interview 12/2022	Increase in low barrier affordable housing, greater shelter investments, and a priority around mental health services.
<b>Ain Dah Yung Center</b>	Homeless Service Provider	Interview 9/2021	Discussed need for flexible funding for permanent supportive housing and culturally specific services.
<b>Avivo</b>	Homeless Service Provider	Interview 9/2021	Low barrier options for unhoused residents and greater funding for supportive services to transition people to independence.
<b>Face to Face</b>	Youth Services Provider	Interview 9/2021	Make sure homeless youth are not forgotten as investments are made. Flexible funding for youth programming.
<b>Model Cities</b>	Housing Services Provider	Interview 9/2021	Ongoing funding for supportive services and deeply affordable housing units.
<b>Metro Transit Homeless Action Team</b>	Homeless/Law Enforcement Agency	Interview 9/2021	Mental Health services and housing specifically for those experiencing mental health crises.
<b>Ramsey County Veterans Services</b>	Veterans Services	Group Meeting 9/2021	Affordable housing needed for all AMI levels for veterans. Some with strong mental health supports.
<b>Ujaama Place</b>	Homeless Service Provider	Interview 9/2021	Low barrier options for those leaving correctional system.
<b>Unsheltered Provider Workgroup</b>	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

## Attachment H - HOME-ARP Allocation Plan Subs Amendment

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);

## Attachment H - HOME-ARP Allocation Plan Subs Amendment

- (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

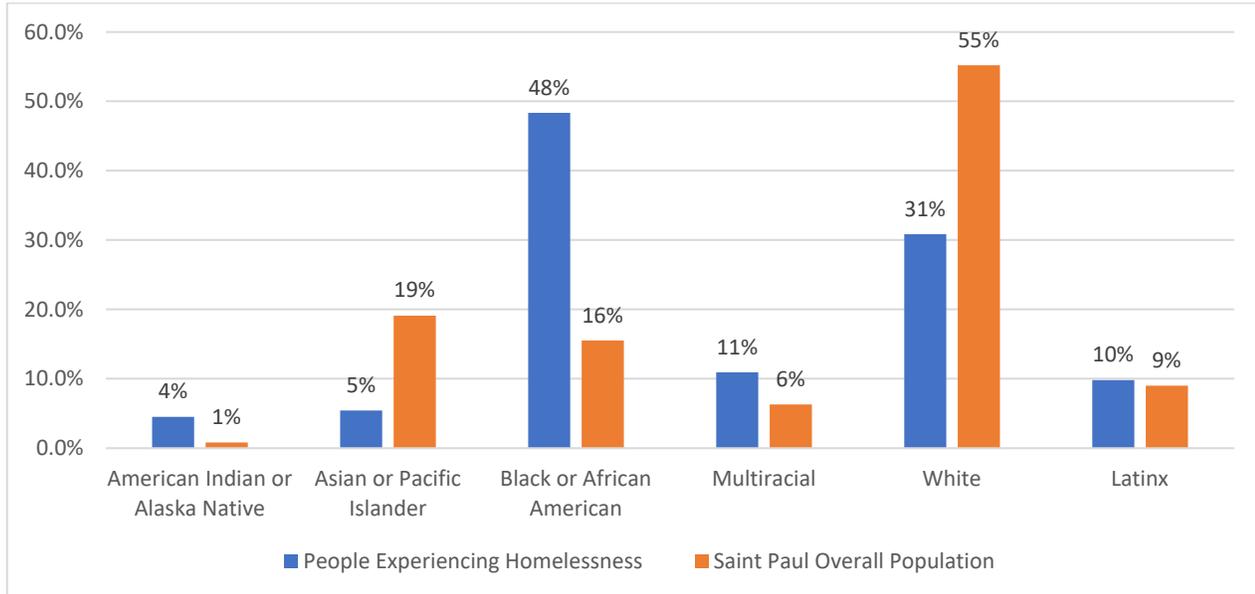
	Homeless Population		Subpopulations		
	In Family Household	In Household (w/out child)	Veterans	Unaccompanied Youth	DV Survivors
<b>Sheltered</b>	497	916	64	17	210
<b>Unsheltered</b>	35	265		1	
<b>Total Combined</b>	1713				

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 Alaska native have a similar disparity, with 4% of population experiencing homelessness and less than 1% of the overall city population.

## Attachment H - HOME-ARP Allocation Plan Subs Amendment

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 addition 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<sup>1</sup>. 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<sup>2</sup>, 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.

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<sup>1</sup> Saint Paul Homeless Assistance Response Team, December 2022.

<sup>2</sup> Minnesota Homeless Study, 2018, Wilder Research. <https://www.wilder.org/mnhomeless>

## Attachment H - HOME-ARP Allocation Plan Subs Amendment

### 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

Housing Type	Total Inventory		Subpopulation Inventory		
	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.

## Attachment H - HOME-ARP Allocation Plan Subs Amendment

### 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

	<b>Current Inventory</b>	<b>Level of Need</b>	<b>Gap Analysis</b>
	# 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)			5,295 (gap in 30%)
Current Gaps (50% AMI)			8,360 (“surplus” in 50)

Source: HUD CHAS using ACS 2015-2019

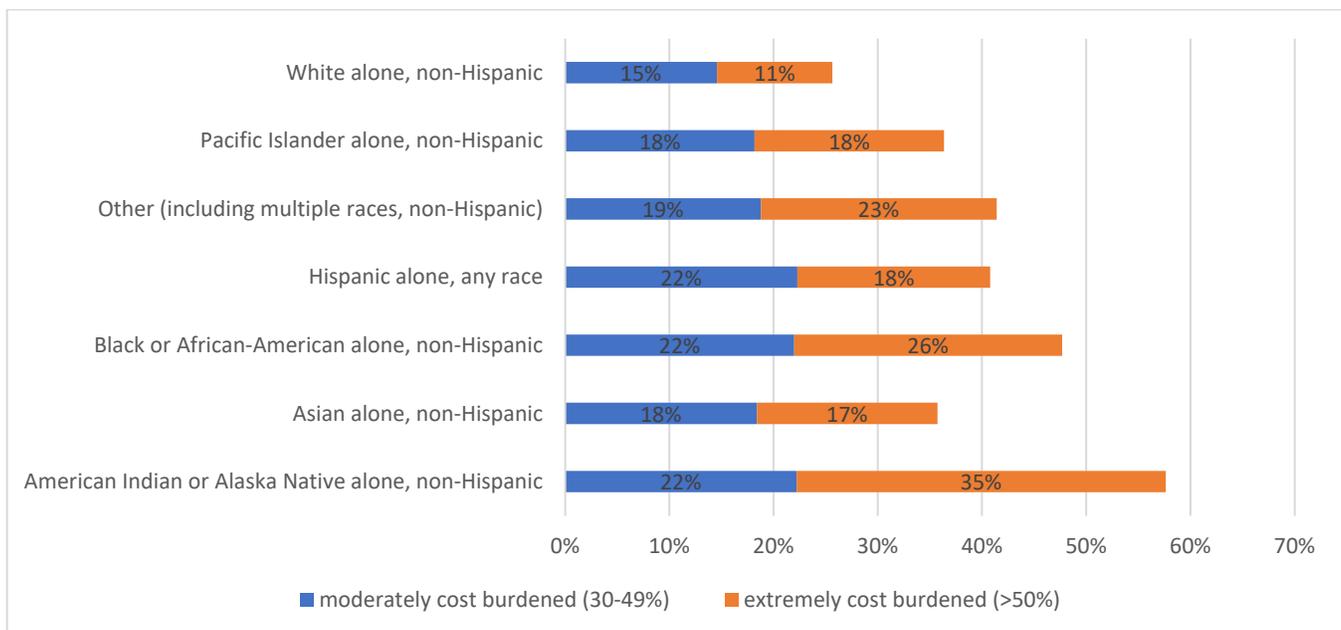
## Attachment H - HOME-ARP Allocation Plan Subs Amendment

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
<b>Total Subsidized Affordable</b>	<b>18,119</b>

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<sup>3</sup>, 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<sup>4</sup>, 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

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<sup>3</sup> HUD Picture of Subsidized Households, 2021, <https://www.huduser.gov/portal/datasets/assthsg.html>

<sup>4</sup> Minnesota Housing Partnership, Saint Paul Market Watch: <https://mhponline.org/issue-2-saint-paul/>

## Attachment H - HOME-ARP Allocation Plan Subs Amendment

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<sup>5</sup>, 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<sup>6</sup> 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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<sup>5</sup> Bridges to Safety: <https://www.bridgestosafety.org/aboutdv.html>

<sup>6</sup> Women's Advocates: <https://www.wadvocates.org/>

## Attachment H - HOME-ARP Allocation Plan Subs Amendment

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<sup>7</sup>, 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.

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

## Attachment H - HOME-ARP Allocation Plan Subs Amendment

### 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 sunseting of the existing NCS stood up during the pandemic and the wish to provide a more permanent solution of this opportunity in the community.~~

## Attachment H - HOME-ARP Allocation Plan Subs Amendment

### 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

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

### 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.

## Attachment H - HOME-ARP Allocation Plan Subs Amendment

### **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**

## Attachment H - HOME-ARP Allocation Plan Subs Amendment

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 these 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.~~

## HOME-ARP Refinancing Guidelines

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

## Attachment I - Affidavit of Publication

Page intentionally blank, attachment not part of draft and will be submitted with final version after public comment period.

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## GLOSSARY OF TERMS, ACRONYMS, AND ABBREVIATIONS

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

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

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

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

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

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

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

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

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

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

## Attachment K - Glossary of Terms, Acronyms, and Abbreviations

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

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

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

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

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

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

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

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

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

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

**CWRC - Citywide Resident Council** - its purpose is to advocate for residents before STPHA and other agencies; evaluate physical and social conditions at respective developments or buildings; encourage programs and activities designed to promote leadership, self-sufficiency, safety, and education; and encourage good working relationships between residents and STPHA staff.

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

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

## Attachment K - Glossary of Terms, Acronyms, and Abbreviations

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

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

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

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

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

**FHIC – Fair Housing Implementation Council** - a collaboration of local and county governments that recognize a regional approach is necessary to effectively eliminate impediments to fair housing and promote fair housing opportunities. The collaboration consists of: Saint Paul, the counties of Anoka, Dakota, Hennepin, and Washington; the Metro HRA (Metropolitan Council); the Community Development Agencies of Scott and Carver Counties; and the cities of Bloomington, Eden Prairie, Minneapolis, Minnetonka, Plymouth, Coon Rapids, and Woodbury.

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

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

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

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

## Attachment K - Glossary of Terms, Acronyms, and Abbreviations

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

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

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

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

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

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

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

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

**HTF – Housing Trust Fund** - an affordable housing production program that complements existing Federal, state, and local efforts to increase and preserve the supply of decent, safe, and sanitary affordable housing for extremely low- and very low- income households and may include homeless families. HTF funds are typically used for the production or preservation of affordable housing through the acquisition, new construction, reconstruction, and/or rehabilitation of non-luxury housing with suitable amenities.

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

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

**JPA – Joint Powers Agreement** – a formal, legal agreement between the City of Saint Paul and Ramsey County for the administration of the City's annual formula allocation of

## Attachment K - Glossary of Terms, Acronyms, and Abbreviations

Emergency Solutions Grant funding from the U.S. Department of Housing and Urban Development.

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

**LBP** – Lead-Based Paint.

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

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

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

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

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

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

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

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

**Multifamily Housing** – A building with 4 or more residential units, including apartments and condominiums. Multifamily units are generally attached and share a common lot.

## Attachment K - Glossary of Terms, Acronyms, and Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

## Attachment K - Glossary of Terms, Acronyms, and Abbreviations

able to private sources of capital financing for owners to address deferred maintenance issues.

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

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

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

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

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

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

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

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

**SPPD** – Saint Paul Police Department.

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

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

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

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

## Attachment K - Glossary of Terms, Acronyms, and Abbreviations

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

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

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

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

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

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

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

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

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

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

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