

Development Compliance Matrix

Compliance	Thresholds	Requirements	Exemptions
Affirmative Action / Equal Employment Opportunity (AA/EEO) Sec 183.04 Legislative Code and 86.06 Administrative Code	Contractors with \$50,000 or more in total city contracts or subsidy within previous 12 months. Sales made under HRA Land Disposition Policy	Contractor must register Affirmative Action Plan. Contractor must submit \$75 AAP registration fee. Construction projects to follow state workforce inclusion requirements.	None
HUD Section 3 12 USC Chap 13 and 24 CFR Part 75	Rehabilitation, housing construction, and other public construction projects receiving \$200,000 or more of HUD funds.	Subrecipients, grantees, developers, contractors, and subcontractors direct employment and economic opportunities to low- and very low-income Section 3 Workers and Section 3 Businesses. Compliance and reporting requirement must be submitted to the city.	None
Federal Prevailing Wage (Davis-Bacon) 40 USC 3141-3148	Federally-funded (ex., HUD) construction projects over \$2,000 (total project cost) requiring the use of skilled labor or construction trades.	All individuals performing work onsite must be paid the correct prevailing wage rate(s). Contractor certified payroll and compliance documentation submitted to the city is required.	Federal Davis Bacon regulatory exemptions: <ul style="list-style-type: none"> • CDBG funded housing projects with 7 or fewer units • 11 or fewer HOME -assisted units • Demolition without future reuse Does not apply to ARPA funds
State Prevailing Wage Minn. Stat. 177.41-177.44 and Rules 5200.1000-5200.1120	State-funded (ex., DEED, MHFA, economic development financial assistance) construction projects requiring the use of skilled labor or construction trades.	All individuals performing work onsite must be paid the correct prevailing wage rate(s). Contractor certified payroll and compliance documentation submitted to the city is required.	None (including single family homes)
City Prevailing Wage Sec 82.07 Administrative Code	City-funded construction projects over \$25,000 (total project cost) requiring the use of skilled labor or construction trades.	All individuals performing work onsite must be paid the correct prevailing wage rate(s). Contractor certified payroll and compliance documentation submitted to the city is required.	Incorporates Federal Davis Bacon regulatory exemptions: <ul style="list-style-type: none"> • CDBG funded housing projects with 7 or fewer units • 11 or fewer HOME -assisted units • Demolition without future reuse

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Vendor Outreach Program (VOP) Chapter 84 Administrative Code	Total project cost greater than \$50,000 with any amount of city funds. Sales made under HRA Land Disposition Policy	<ol style="list-style-type: none"> 1) Small business inclusion goals set per-project. 2) Generally, 25% of project contract opportunities awarded to CERT-certified, Small, Women-, and Minority-owned businesses. 3) Subgoals include: <ol style="list-style-type: none"> a. 10% Small businesses b. 10% Women-owned businesses c. 5% Minority-owned businesses 4) Good faith efforts may be requested if goals are not met. 5) Payment reporting required. 	<ul style="list-style-type: none"> • Contracts without business opportunities including professional services. • Contracts where the only business opportunities are for highly specialized scopes with fewer than 5 business in the country providing the service. • Contracts with small business inclusion goals set by the federal disadvantaged business enterprise (DBE) program.
Bonds – revenue and conduit (includes 4% tax credits)	All Bonds – No threshold	City prevailing wage, Affirmative Action, Vendor Outreach, Sustainable Building Ordinance.	Conduit bonds issued to a qualified 501(c)(3) entity are not subject to the Sustainable Building Ordinance.
Business Subsidy Minn. Stat. §§ 116J.993-116J.995	<ol style="list-style-type: none"> a) \$150,000 for grant or other subsidy including loans b) more limited reporting requirements for loan or loan guarantee of \$75,000 or more and for grant of \$25,000 or more 	Wage and job goals, reporting. Must meet a public purpose	Redevelopment when purchase of the site and site preparation is greater than 70% of assessed value, redevelopment of contaminated property, pollution control or abatement, renovation of old buildings or historic district assistance when assistance is less than 50% of costs, energy conservation, housing, certain, nonprofit corporations, and other exemptions – see 116J.993, Subd. 3.
Early notification system (ENS) Appendix – Chapter A-11 Administrative Code HRA Res 09-09/23-01	\$250,000 or awarded developer rights	Provides notice to interested persons of applications for HRA financial assistance and developer rights.	None
Limited English Proficiency (LEP) Executive Order 13166 and HUD/Treasury Guidance	All federal financial assistance	Requirement to provide meaningful access to PED programs, services, and activities to persons with limited English proficiency.	None

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Living Wage Chapter 98 Administrative Code	\$100,000	In 2024, living wage is 130% of the poverty level for a family of four is \$19.50 per hour or 110% (\$16.50 per hour) if health benefits are provided. Wage rates change annually. Duration is longer of three years or length of subsidy.	Small business with: <ul style="list-style-type: none"> • 20 or fewer full-time employees • Gross revenues of less than \$1,000,000, or if • Professional/Technical Business than gross revenues less than \$2,500,000 • No exemptions for housing
Low Income Housing Tax Credits (9% tax credits)	All Low Income Housing Tax Credits (LIHTC)	City prevailing wage, Affirmative Action, Vendor Outreach, Sustainable Building Ordinance.	None
Project Labor Agreements (PLA) City Council Resolution No. 09-584	\$250,000	Building and construction projects, parks, public works Decision for use or non-use must be made by Council before approval of the project. Interested parties given 10 days' notice and opportunity to respond. Public Hearing on request	Conduit bonds
Sustainable Building Ordinance Chapter 81 Administrative Code	More than \$200,000. All new construction and certain rehab projects Facilities owned and operated by the city of Saint Paul or HRA	Must be certified under one of the eligible green building standards, and comply with the Saint Paul Overlay. See Ordinance.	Conduit bonds except for multi-family housing revenue bonds. Does not apply to DEED Cleanup, TBRA Cleanup and TBRA site investigation pass thrus.
PED/HRA Sustainability Initiative documentation	Projects that do not meet the Sustainable Building Ordinance threshold. All newly constructed commercial buildings over 15,000 square feet or all newly constructed residential buildings with common space over 15,000 square feet, or all newly construction residential buildings over 150,000 square feet	Participate in Xcel Energy Design Assistance	Does not apply if complying with the Sustainable Building Ordinance

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Two Bid Policy HRA Policy dated 2/9/2009	\$20,000	Requirement to obtain two bids from general contractors and subcontractors; award contract to lowest responsible bidder.	Exemption of process followed for negotiated contract with general contractor. Excludes conduit bonds and soft cost contracts
Affirmative Fair Housing Marketing Plan 24 CFR 92.351 and 24 CFR Part 200.600-200.640	5 or more HOME or CDBG assisted units; or Lots funded or insured through FHA or HUD	Adopt and Maintain an Affirmative Fair Housing Marketing Plan	None